

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Laclede Gas Company’s) **File No. GR-2017-0215**
Request to Its Revenues for Gas Service) Tariff No. YG-2017-0195

In the Matter of Laclede Gas Company d/b/a) **File No. GR-2017-0216**
Missouri Gas Energy’s Request to Increase) Tariff No. YG-2017-0196
Its Revenues for Gas Service)

**NONUNANIMOUS STIPULATION REGARDING
REVENUE ALLOCATION AND NON-RESIDENTIAL RATE DESIGN**

COMES NOW, Laclede Gas Company (“Laclede”), (now known as Spire Missouri Inc. d/b/a Spire (referred to herein as “LAC”), Laclede Gas Company d/b/a Missouri Gas Energy (now known as Spire Missouri West but referred to herein as “MGE”), the Staff of the Missouri Public Service Commission (“Staff”), the Office of the Public Counsel (“OPC”), ; the Midwest Energy Consumers Group; and the Missouri Industrial Energy Consumers (collectively referred to as “Signatories”) and present this Non-Unanimous Stipulation regarding Revenue Allocation and Non-Residential Rate Design.

LAC Revenue Allocation

1. The Signatories agree that any revenue increase for LAC shall be allocated in a manner reflected in Attachment 1. In general, the Signatories agree:

(A) if the final revenue increase is any amount up to \$11,958,306 (the revenue requirement recommended in Staff’s direct testimony at the mid-point return on equity), then the revenue increase shall be allocated in a manner consistent with Staff’s direct testimony;

(B) if the final revenue increase is any amount between \$11,958,306 and \$32,600,000 (the current amount of LAC's ISRS revenues), then:

(i) the amount up to \$11,958,306 shall be allocated consistent with section 1(A) *supra*; and

(ii) any amount above \$11,958,306 shall be allocated on an equal percent basis except that there shall be a maximum shift of \$450,000, at an overall revenue increase of \$32.6 million, of revenue responsibility away from the Large Volume Transport class to be assigned 25% to the Residential class and 75% to the Small General Service class. This \$450,000 shift shall be proportionally adjusted downward if the final revenue increase falls between \$11,958,306 and \$32,600,000.

(C) if the final revenue increase is any amount above \$32,600,000 then:

(i) the amount up to \$11,958,306 shall be allocated consistent with section 1(a) *supra*;

(ii) the amount between \$11,958,306 and \$32,600,000 shall be allocated consistent with section 1(B)(ii) *supra*; and

(iii) the amount above \$32,600,000 shall be allocated on an equal percent basis to each class.

LAC Rate Design

2. The Signatories agree that any rate increase allocated to the Large Volume Transport class will be applied to the customer charge up to the level of the Company's requested customer charge and the remaining increase will be applied by equal percent to each rate element.

3. The Signatories agree that any rate increase allocated to the Large Volume class will be applied to the customer charge up to the level of the Company's requested customer charge and the remaining increase will be applied by equal percent to each rate element.

4. The rate design for all other classes, except the residential class, shall be applied in a manner consistent with Staff's direct testimony.¹

MGE Revenue Allocation

5. The Signatories agree that any revenue increase for MGE shall be allocated in a manner reflected in Attachment 2. In general, the Signatories agree:

(A) there shall be a revenue neutral shift of \$640,000 to the Small General Service class. Such revenue shall come equally from the Large General Service and Large Volume classes.

(B) any revenue increase shall be applied on an equal percent basis to all classes after making the revenue neutral shifts provided in section 5(A) *supra*.

MGE Rate Design

6. The Signatories agree that the Large Volume rate design shall be developed as follows:

(A) Determine the volumetric rate as though the final MGE revenue requirement is equal to current ISRS revenue level (\$16.4 million), the customer charge applied to a customer's first two meters is \$1120, and the additional meter charge is \$300. The volumetric rates shall be adjusted by the percent of usage in each seasonal

¹ This stipulation does not address the issue concerning the LAC residential customer charge or LAC's proposal relating to the implementation of a transition period for implementing its proposed revenue stabilization mechanism.

block so that the revenue produced equals the Large Volume class' revenue responsibility.

Based on the MGE's Large Volume billing determinants and MGE's rate increase allocation addressed in this stipulation and agreement, below are the agreed upon rates for the MGE Large Volume class.

- Fixed Monthly Charge (applied to the first two meters) shall be \$1120
- Additional Meter Charge (applied to each meter in excess of two meters) shall be \$300
 - the volumetric rate for the first summer block shall be \$0.03441 / CCF.
- the volumetric rate for the second summer block shall be \$0.02228 / CCF.
- the volumetric rate for the first winter block shall be \$0.05512/ CCF.
- the volumetric rate for the second winter block shall be \$0.04300 / CCF.

(B) If the final MGE revenue requirement is less than the current ISRS revenue level (\$16.4 Million), then the \$1120 fixed monthly charge and \$300 additional meter charge agreed to in 6(A) will be reduced so that the revenue produced equals the Large Volume class' revenue responsibility. However, in no event will the additional meter charge be reduced below the current additional meter charge of \$259.34.

(C) If the final revenue requirement for MGE is above the current ISRS revenue level of \$16.4 million, then each rate element as agreed to pursuant to 6(A) will be adjusted upward by an equal percent so that the revenue produced equals the Large Volume class' revenue responsibility.

7. The Signatories agree that the rate design for all other classes, except the residential class, shall be applied in a manner consistent with Staff's direct testimony.²

Billing Determinants

8. The Signatories agree to the billing determinants for MGE provided in Attachment 3 and for LAC provided in Attachment 4.

9. The billing determinants for MGE's SGS and LGS classes include MGE's requested rate classification adjustment that quantifies the revenue and billing determinant differences for customers who should be moved between the two classes due to the size of the customer and the size requirement to be in the class. The Company agrees to switch the customers identified in the classification adjustment within 30 days of the effective date of rates and provide a report to Staff within 60 days of the effective date of rates documenting the customers moved between classes. The Company further agrees to add tariff language to MGE's SGS and LGS rate tariffs requiring the Company to review the customers in the SGS and LGS classes annually for changes in customer usage and switch customers to their appropriate rate class if necessary.

² This stipulation does not address the issue concerning the MGE residential customer charge or MGE's proposal relating to the implementation of a transition period for implementing its proposed revenue stabilization mechanism.

Other Provisions

10. Except as otherwise expressly specified herein, none of the signatories to this Stipulation and Agreement shall be deemed to have approved or acquiesced in any ratemaking or procedural principle, including, without limitation, any method of cost determination or cost allocation, depreciation or revenue-related method, or any service or payment standard; and none of the signatories shall be prejudiced or bound in any manner by the terms of this Stipulation and Agreement in this or any other Commission or judicial review or other proceeding, except as otherwise expressly specified herein. Nothing in this Stipulation and Agreement shall preclude the Staff in future proceedings from providing recommendations as requested by the Commission nor limit Staff's access to information in any other proceedings. Nothing in this Stipulation and Agreement shall be deemed a waiver of any statute or Commission regulation.

11. This Stipulation and Agreement has resulted from extensive negotiations among the signatories and the terms hereof are interdependent. In the event that the Commission does not approve this Stipulation and Agreement, or approves this Stipulation and Agreement with modifications or conditions to which a Party to this proceeding objects, this Stipulation and Agreement shall be void and no signatory shall be bound by any of the agreements or provisions hereof.

12. In the event the Commission accepts the specific terms of this Stipulation and Agreement, the Signatories waive, with respect to the issues resolved herein: their respective rights pursuant to Section 536.080.1 (RSMo. 2000) to present testimony, to cross-examine witnesses, and to present oral argument and written briefs; their respective rights to the reading of the transcript by the Commission pursuant to Section 536.070.

(RSMo. 2000); and their respective rights to judicial review of the Commission's Report and Order in this case pursuant to Section 386.510 (RSMo. 2000).

13. The Signatories agree that all of the prefiled testimony submitted in this case, as well as affidavits prepared and filed by any of the Signatories in lieu of a Memoranda in Support, that relates to any issue resolved by this Stipulation and Agreement shall be received into evidence without the necessity of the respective witnesses taking the stand.

14. The Staff shall have the right to provide, at any agenda meeting at which this Stipulation and Agreement is noticed to be considered by the Commission, whatever oral explanation the Commission requests. Staff shall, to the extent reasonably practicable, provide the other Signatories with advanced notice of the agenda in which Staff will respond to the Commission's request for information. Staff's oral explanation shall be subject to public disclosure, except to the extent it refers to matters that are privileged, highly confidential, or proprietary.

15. If the Commission so requests, the Staff shall file suggestions or a memorandum in support of this Stipulation. Each of the other Signatories shall be served with a copy of any such suggestions or memorandum and shall be entitled to submit to the Commission, within five (5) days of receipt of Staff's suggestions or memorandum, responsive suggestions or a responsive memorandum which shall also be served on all parties to the case. The contents of any memorandum provided by any party are its own and are not acquiesced in or otherwise adopted by the other Parties in this case, whether or not the Commission issues an Order approving this Stipulation.

16. To assist the Commission in its review of this Stipulation, the Signatories also request that the Commission advise them of any additional information the Commission may desire from the Signatories relating to the matters addressed in this Stipulation, including any procedures for furnishing such information to the Commission.

WHEREFORE, the Signatories respectfully request that the Commission issue its Order approving all of the specific terms and conditions of this Stipulation and Agreement.

Respectfully submitted,

**MISSOURI PUBLIC SERVICE
COMMISSION STAFF**

/s/Mark Johnson

/s/Whitney Payne

Mark Johnson (#64940)

Whitney Payne (#64078)

P. O. Box 360

Jefferson City, MO 65102

(573) 751-7431 (Telephone)

(573) 751-9285 (Fax)

mark.johnson@psc.mo.gov

whitney.payne@psc.mo.gov

MIDWEST ENERGY CONSUMERS GROUP

/s/ David Woodsmall

David Woodsmall (#40747)

308 E. High Street, Suite 204

Jefferson City, MO

(573) 797-0005

(573) 636-6007 FAX

david.woodsmall@woodsmalllaw.com

**LACLEDE GAS COMPANY
MISSOURI GAS ENERGY**

/s/ Rick E. Zucker

Rick E. Zucker (#49211)
Associate General Counsel
Laclede Gas Company
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0533 (telephone)
(314) 421-1979 (fax)
rick.zucker@spireenergy.com

/s/ Michael C. Pendergast

Michael C. Pendergast (#31763)
Fischer & Dority, P.C.
423 Main Street
St. Charles, MO 63301
(314) 288-8723 (telephone)
mcp2015law@icloud.com

OFFICE OF THE PUBLIC COUNSEL

/s/ Hampton Williams

Hampton Williams (#65633)
Acting Public Counsel

/s/ Lera Shemwell

Lera Shemwell (#43792)
Senior Counsel
P. O. Box 2230
Jefferson City MO 65102
(573) 751-4857
(573) 751-5562 FAX
hampton.williams@ded.mo.gov

**MISSOURI INDUSTRIAL ENERGY
CONSUMERS**

/s/ Lewis R. Mills

Lewis R. Mills (#35275)
Edward F. Downey (#28866)
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
(573) 556-6620
(573) 556-6630 FAX
lewis.mills@bryancave.com
efdowney@bryancave.com

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served through electronic mail this 20th day of December, 2017, to all parties on the Commission's service list in this case.

/s/ Whitney Payne

| Missouri Public Service Commission | | | | | | | | | | |
|--|------------------------|-----------------------|----------------------|---------------------------|----------------------------------|---------------------------|----------------------|------------------|---------------------------|------------------|
| Case No. GR-2017-0215 & GR-2017-0216 | | | | | | | | | | |
| LACLEDE RATE INCREASE ALLOCATION - Example of calculation for Revenue Requirement increase of \$32.6 million | | | | | | | | | | |
| | Total Current Revenue* | Adjusted Retail | Retail Increase | Total Revenue Requirement | Retail Increase Per Staff Direct | Total Revenue Requirement | Net ISRS Increase | Settlement Shift | Total Revenue Requirement | Percent Increase |
| Residential | \$ 258,325,769 | \$ 258,325,769 | \$ 9,472,723 | \$ 267,798,492 | \$ 9,472,723 | \$ 267,798,492 | \$ 16,351,234 | \$ 112,500 | \$ 284,262,226 | 10.04% |
| SGS | \$ 30,022,762 | \$ 30,022,762 | \$ 1,100,925 | \$ 31,123,687 | \$ 1,688,285 | \$ 31,711,046 | \$ 1,936,212 | \$ 337,500 | \$ 33,984,759 | 13.20% |
| LGS | \$ 21,515,031 | \$ 21,515,031 | \$ 788,949 | \$ 22,303,980 | \$ 788,949 | \$ 22,303,980 | \$ 1,361,836 | | \$ 23,665,816 | 10.00% |
| Large Volume | \$ 1,766,667 | \$ 1,766,667 | \$ 64,783 | \$ 1,831,450 | | \$ 1,766,667 | \$ 107,869 | | \$ 1,874,536 | 6.11% |
| LV Transport | \$ 13,435,392 | \$ 13,435,392 | \$ 492,672 | \$ 13,928,063 | | \$ 13,435,392 | \$ 820,338 | \$ (450,000) | \$ 13,805,729 | 2.76% |
| Interruptible Sales | \$ 815,523 | \$ 815,523 | \$ 29,905 | \$ 845,428 | | \$ 815,523 | \$ 49,794 | | \$ 865,318 | 6.11% |
| General L.P. Gas | \$ 11,111 | \$ 11,111 | \$ 407 | \$ 11,518 | \$ 407 | \$ 11,518 | \$ 703 | | \$ 12,222 | 10.00% |
| Unmetered Gas Light | \$ 43,662 | \$ 43,662 | \$ 1,601 | \$ 45,263 | \$ 1,601 | \$ 45,263 | \$ 2,764 | | \$ 48,027 | 10.00% |
| Vehicular Fuel | \$ 172,904 | \$ 172,904 | \$ 6,340 | \$ 179,244 | \$ 6,340 | \$ 179,244 | \$ 10,944 | | \$ 190,189 | 10.00% |
| Total | \$ 326,108,820 | \$ 326,108,820 | \$ 11,958,306 | \$ 338,067,126 | \$ 11,958,306 | \$ 338,067,126 | \$ 20,641,694 | \$ - | \$ 358,708,820 | |
| | | | \$ 11,958,306 | | | \$ - | \$ 20,641,694 | | | |

*Total Current Revenues as determined at this time.

1. If the revenue requirement increase is at or below \$11,958,306 - Retail Increase is applied per Staff direct
2. If the revenue requirement is between \$11.9 and \$32.6 then the difference between \$11.9 and \$32.6 is applied to the classes on an equal percent with the exception of a shift of responsibility from LV Transport to SGS and Residential.
 - 2a. The size of the shift from LV Transport is $(450,000 / 820,338) * \text{"Settlement Increase"}$ for LV Transport
 - 2b. The shift from LV Transport is allocated 75% to SGS and 25% to the Residential class.
3. If the revenue requirement increase is above \$32.6 then the amount of the increase above \$32.6 is applied as an equal percent increase to each class.

| Missouri Public Service Commission | | | | | | | | | |
|---|-----------------|--------------|----------------|-----------------|----------------|--------------|---------------|----------------|----------|
| Case No. GR-2017-0215 & GR-2017-0216 | | | | | | | | | |
| MGE RATE INCREASE ALLOCATION - Example of calculation for Revenue Requirement increase of \$16.4 million | | | | | | | | | |
| | | 1 | | 2 | | 3 | | | |
| | Total Current | Revenue | Adjusted | | Total Revenue | Net ISRS | Total Retail | Total Revenue | Percent |
| | Revenue* | Shift | Retail | Retail Increase | Requirement | Increase | Increase | Requirement | Increase |
| Residential | \$ 155,999,118 | | \$ 155,999,118 | \$ 6,824,201 | \$ 162,823,319 | \$ 5,974,903 | \$ 12,799,104 | \$ 168,798,221 | 8.20% |
| SGS | \$ 16,015,152 | \$ 640,000 | \$ 16,655,152 | \$ 728,582 | \$ 17,383,734 | \$ 637,907 | \$ 2,006,489 | \$ 18,021,641 | 12.53% |
| LGS | \$ 12,980,754 | \$ (320,000) | \$ 12,660,754 | \$ 553,846 | \$ 13,214,600 | \$ 484,918 | \$ 718,764 | \$ 13,699,518 | 5.54% |
| Large Volume | \$ 14,891,651 | \$ (320,000) | \$ 14,571,651 | \$ 637,439 | \$ 15,209,090 | \$ 558,107 | \$ 875,546 | \$ 15,767,197 | 5.88% |
| Unmetered Gas Light | \$ 1,190 | \$ - | \$ 1,190 | \$ 52 | \$ 1,242 | \$ 46 | \$ 98 | \$ 1,288 | 8.20% |
| | | \$ - | \$ 0 | \$ - | \$ - | \$ - | \$ - | \$ - | |
| | | | \$ 0 | \$ - | \$ - | \$ - | \$ - | \$ - | |
| | | | \$ 0 | \$ - | \$ - | \$ - | \$ - | \$ - | |
| Total | \$ 199,887,865 | \$ - | \$ 199,887,865 | \$ 8,744,120 | \$ 208,631,985 | \$ 7,655,880 | \$ 16,400,000 | \$ 216,287,865 | |
| | | | | | | | | | |
| | True-up Revenue | | | \$ 8,744,120 | | \$ 7,655,880 | | | |
| | | | | | | | | | |
| *Total Current Revenue as determined at this time. | | | | | | | | | |
| 1. Prior to allocating the retail increase, a revenue neutral shift will be made. | | | | | | | | | |
| 2. The retail increase at Staff's direct filed revenue requirement will allocated to each class on an equal percent basis | | | | | | | | | |
| 3. The retail increase above Staff's direct filed revenue requirement will be allocated to each class on an equal percent basis | | | | | | | | | |
| For purposes of Large Volume rate design the total revenue requirement was calculated using MGE's ISRS level of \$16.4 million | | | | | | | | | |

MGE Billing Determinants

MGE Residential

| | Determinants | Rate | Total Revenue |
|------------------|--------------|------------|----------------|
| Customer Charge | 5,639,363 | \$ 23.00 | \$ 129,705,355 |
| Commodity Charge | | | \$ - |
| All CCF's | 356,284,043 | \$ 0.07380 | \$ 26,293,762 |
| | 356,284,043 | | \$ 155,999,118 |

MGE SGS*

| | Determinants | Rate | Total Revenue |
|------------------|--------------|------------|---------------|
| Customer Charge | 380,728 | \$ 34.00 | \$ 12,944,737 |
| Commodity Charge | | | \$ - |
| All CCF's | 56,545,398 | \$ 0.05430 | \$ 3,070,415 |
| | 56,545,398 | | \$ 16,015,152 |

MGE LGS*

| | Determinants | Rate | Total Revenue |
|------------------|--------------|------------|---------------|
| Customer Charge | 43,530 | \$ 115.40 | \$ 5,023,362 |
| Commodity Charge | | | \$ - |
| Winter CCF's | 47,304,244 | \$ 0.13268 | \$ 6,276,327 |
| Summer CCF's | 21,983,325 | \$ 0.07647 | \$ 1,681,065 |
| | 69,287,569 | | \$ 12,980,754 |

MGE Large Volume

| | Determinant | Rate | Revenue |
|------------------|-------------|------------|---------------|
| Meter Charge | 5520 | \$ 904.56 | \$ 4,993,171 |
| Additional Meter | 516 | \$ 259.34 | \$ 133,819 |
| Winter Therms | | | \$ - |
| Block 1 | 35,917,817 | \$ 0.05636 | \$ 2,024,328 |
| Block 2 | 94,835,338 | \$ 0.04424 | \$ 4,195,515 |
| Summer Therms | | | \$ - |
| Block 1 | 38,512,740 | \$ 0.03565 | \$ 1,372,979 |
| Block 2 | 100,433,173 | \$ 0.02352 | \$ 2,362,188 |
| Special contract | | | \$ (335,251) |
| EGM | | | \$ 144,900 |
| Total | 269,699,069 | | \$ 14,891,651 |

*MGE SGS and MGE LGS include the Company's Rate Classification adjustment that accounts for the Company switching customer between the SGS and LGS rate classes so that customers are within their appropriate class based on the customer's size.

LAC Billing Determinants

LAC Residential

| | Determinants | Rate | | Revenue |
|---------------------|--------------|------|---------|----------------|
| Number of Customers | 7,259,679 | \$ | 19.50 | \$ 141,563,746 |
| Winter Therms | | | | |
| Block 1 | 104,729,572 | \$ | 0.91686 | \$ 96,022,355 |
| Block 2 | 313,800,331 | \$ | - | |
| Summer Therms | | | | |
| Block 1 | 61,214,370 | \$ | 0.31290 | \$ 19,153,976 |
| Block 2 | 10,366,028 | \$ | 0.15297 | \$ 1,585,691 |
| | 492,926,126 | | | \$ 258,325,769 |

*LAC CI

| | Determinant | Rate | | Revenue |
|---------------------|-------------|------|---------|---------------|
| Number of Customers | 371,812 | \$ | 25.50 | \$ 9,481,206 |
| Winter Therms | | | | |
| Block 1 | 7,625,086 | \$ | 0.87711 | \$ 6,688,039 |
| Block 2 | 34,432,969 | \$ | - | |
| Summer Therms | | | | |
| Block 1 | 2,617,480 | \$ | 0.33832 | \$ 885,546 |
| Block 2 | 4,714,577 | \$ | 0.11492 | \$ 541,799 |
| | 49,761,924 | | | \$ 17,596,590 |

*LAC CII

| | Determinant | Rate | | Revenue |
|---------------------|-------------|------|---------|---------------|
| Number of Customers | 108,157 | \$ | 44.29 | \$ 4,790,274 |
| Winter Therms | | | | |
| Block 1 | 23,594,394 | \$ | 0.61244 | \$ 14,450,150 |
| Block 2 | 61,355,221 | \$ | - | \$ - |
| Summer Therms | | | | |
| Block 1 | 12,392,466 | \$ | 0.15306 | \$ 1,896,791 |
| Block 2 | 11,256,605 | \$ | 0.12421 | \$ 1,398,183 |
| | 108,598,685 | | | \$ 22,535,398 |

*LAC CIII

| | Determinant | Rate | | Revenue |
|---------------------|-------------|------|---------|---------------|
| Number of Customers | 7,526 | \$ | 88.57 | \$ 666,596 |
| Winter Therms | | | | |
| Block 1 | 10,381,698 | \$ | 0.85663 | \$ 8,893,274 |
| Block 2 | 29,822,192 | \$ | - | \$ - |
| Summer Therms | | | | |
| Block 1 | 6,603,269 | \$ | 0.15444 | \$ 1,019,809 |
| Block 2 | 6,631,824 | \$ | 0.12457 | \$ 826,126 |
| | 53,438,983 | | | \$ 11,405,805 |

LAC Large Volume Transportation

| | Determinants | Rate | Revenue |
|---------------------|--------------|------------|--------------|
| Customer Charge | 1,764 | \$2,069.64 | \$3,650,845 |
| Commodity Charge | | | |
| First 36,000 therms | 53,824,094 | \$ 0.02509 | \$1,350,447 |
| Over 36,000 therms | 132,083,577 | \$ 0.01050 | \$1,386,878 |
| Reservation Therm | 11,745,371 | \$ 0.60 | \$7,047,223 |
| Total | 185,907,671 | | \$13,435,392 |

LAC Large Volume

| | Determinants | Rate | Revenue |
|---------------------|--------------|------------|--------------|
| Customer Charge | 804 | \$ 874.78 | \$ 703,323 |
| Commodity Charge | | | \$ - |
| First 36,000 therms | 10,809,370 | \$ 0.02502 | \$ 270,450 |
| Over 36,000 therms | 113,358 | \$ 0.00701 | \$ 795 |
| Demand | 833,788 | \$ 0.95 | \$ 792,098 |
| | 10,707,110 | | \$ 1,766,667 |

LAC Interruptible

| | Determinants | Rate | Total Revenue |
|----------------------|--------------|------------|---------------|
| Customer Charge | 240 | \$ 776.36 | \$ 186,326 |
| Commodity Charge | | | |
| First 100,000 therms | 5,097,855 | \$ 0.10440 | \$ 532,216 |
| Over 100,000 therms | 1,199,813 | \$ 0.08083 | \$ 96,981 |
| | 6,297,668 | | \$ 815,523 |

*CI, CII, CIII are consolidated into an SGS class and LGS class

NEW SGS

CI and part of CII

| | |
|---------------------|---------------|
| Number of Customers | 440,916 |
| Usage | 84,101,007 |
| Revenue | \$ 30,022,762 |

NEW LGS

CII and part of CII

| | |
|---------------------|---------------|
| Number of Customers | 46,579.60 |
| Usage | 127,698,585 |
| Revenue | \$ 21,515,031 |