THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Dwight D. Keen

In the Matter of a General Investigation Regarding the Effect of Federal Income Tax Reform on the Revenue Requirements of Kansas Public Utilities and Request to Issue an Accounting Authority Order Requiring Certain Regulated Public Utilities to Defer Effects of Tax Reform to a Deferred Revenue Account.) Docket No. 18-GIMX-248-GIV

ORDER GRANTING JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT REGARDING KANSAS GAS SERVICE

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the file and records, and being properly advised, the Commission finds:

1. On December 14, 2017, Commission Staff (Staff) filed a Motion to Open a General Investigation and Issue Accounting Authority Order Regarding Federal Tax Reform.[1]

2. On December 22, 2017, the Citizens' Utility Ratepayer Board (CURB) filed a Petition to Intervene and a Response in Support of Staff's Motion.[2]

3. On January 18, 2018, the Commission issued an Order Opening General Investigation and Issuing Accounting Authority Order Regarding Federal Tax Reform (TCJA).[3]

4. On March 30, 2018, Kansas Gas Service, a division of ONE Gas, Inc. (Kansas Gas Service), Staff, and CURB filed a Joint Motion for Approval of the Settlement Agreement

[1]Staff's Motion to Open a General Investigation and Issue Accounting Authority Order Regarding Federal Tax Reform, Dec. 14, 2017.
[2]CURB's Petition to Intervene was granted on March 13, 2018.
[3]Order Opening General Investigation and Issuing Accounting Authority Order Regarding Federal Tax Reform, Jan. 18, 2018.

Regarding Kansas Gas Service (Joint Motion). The key provisions of the Settlement Agreement are:

a. Establishment of a regulatory liability by Kansas Gas Service to account for the TCJA's lowering of the federal income tax rate from 35% to 21%;

b. Establishment of a regulatory liability by Kansas Gas Service to account for the impact of the TCJA on the utility's Excess Accumulated Deferred Income Taxes;

c. Disposition of the amounts accrued as a regulatory liability to be determined by the Commission in its final order issued at the completion of Kansas Gas Service's next general rate case filing.

5. On April 5, 2018, Kansas Gas Service, Staff, and CURB each filed testimony in support of the Settlement Agreement.[4] The settlement is unopposed. The Settlement Agreement is a unanimous settlement agreement as defined by K.A.R. 82-1-230a. Therefore, there is no need to apply the five-factor test.[5]

6. The law generally favors compromise and settlement of disputes between parties when they enter into an agreement knowingly and in good faith to settle the dispute.[6] When approving a settlement, the Commission must make an independent finding that the settlement is supported by substantial competent evidence in the record as a whole, establishes just and reasonable rates, and is in the public interest.[7]

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[4]Testimony of Janet L. Buchanan in Support of the Settlement Agreement on Behalf of Kansas Gas Service (Buchanan Direct), Apr. 5, 2018; Staff Testimony in Support of Kansas Gas Service's Settlement Agreement (Jackson Direct), Apr. 5, 2018; Stacy Harden's Testimony in Support of Kansas Gas Service's Settlement Agreement on behalf of CURB (Harden Direct), Apr. 5, 2018.

[5] *See* Order Approving Contested Settlement Agreement, ¶¶ 9-10 (280 Order), Docket No. 08-ATMG-280-RTS (May 12, 2008).

[6]*Krantz v. Univ. of Kansas*, 271 Kan. 234, 241-42 (2001).

[7]*Citizens' Util. Ratepayer Bd. v. Kansas Corp. Comm'n*, 28 Kan. App. 2d 313, 316 (2000), *rev denied* March 20, 2001.

7. Substantial competent evidence possesses something of substance and relevant consequence, which furnishes a substantial basis of fact to reasonably resolve the issues.[8] Whether another trier of fact could have reached a different conclusion given the same facts is irrelevant; a court can only find that a Commission decision is not supported by substantial competent evidence when the evidence shows "the [Commission's] determination is so wide of the mark as to be outside the realm of fair debate."[9]

8. The Commission reviewed a record including pre-filed testimony from all three signatories in support of the Joint Motion and the Joint Motion itself. The Settlement Agreement is supported by substantial, competent evidence in the form of the Direct Testimony of Janet L. Buchanan, the Direct Testimony of Andria Jackson and the Direct Testimony of Stacy Harden. The supporting testimony focuses on two substantive issues: (1) establishing a Regulatory Liability by Kansas Gas Service to account for the lower Federal Income Tax Rate; and (2) establishing a Regulatory Liability by Kansas Gas Service to account for the Impact of the TCJA on Kansas Gas Service's excess ADIT.

9. Having reviewed the record as a whole, the Commission finds and concludes that substantial competent evidence supports approval of the Settlement Agreement in its entirety. Based on its review of the Settlement Agreement and the testimony filed in support of the Settlement Agreement, the Commission finds the provisions in the Settlement Agreement comply with the directives contained in the Commission's January 18, 2018, Order regarding federal tax reform. The Settlement Agreement is a unanimous agreement, resolving all of the issues between

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[8] *Farmland Indus., Inc. v. Kansas Corp. Comm'n*, 25 Kan.App.2d 849, 852 (1999).
[9] *Id.* at 851.

the moving parties.[10] Under Kansas Supreme Court precedent, rates must fall within a "zone of reasonableness" which balances the interests of investors versus ratepayers, present versus future ratepayers, and the public interest.[11] The Signatories agree the Settlement Agreement established a process that will result in reasonable rates.[12] Accordingly, the Commission finds the Settlement Agreement fairly represents a balance of their interests and reaches a reasonable result that is supported by the evidence.

10. Every electric public utility in Kansas is required to provide reasonably efficient and sufficient service and establish just and reasonable rates.[13] The requirement of just and reasonable rates incorporates the "zone of reasonableness" test, and is used to determine whether the rate is within an elusive range of reasonableness in calculating a fair rate of return.[14] The Commission acts within its discretion in finding an "in-between point, where the rate is most fair to the utility and its customers."[15] The Commission considered the competing interests it must take into account in setting rates, and finds the agreed upon revenue requirement falls within the "zone of reasonableness." There is substantial evidence in the record that the agreed-upon process will provide Kansas Gas Service sufficient revenues and cash flows to meet its financial obligations, yet will keep rates as low as possible while maintaining reliable service for its customers. The Commission finds and concludes approval of the Settlement Agreement will result in just and reasonable rates for Kansas Gas Service and its customers.

[10] Buchanan Direct, p. 10; Jackson Direct, p. 7; Harden Direct, p. 11.
[11] *Kansas Gas & Elec. Co. v. Kansas Corp. Comm'n*, 239 Kan. 483, 488 (1986).
[12] Joint Motion for Approval for Approval of Settlement Agreement Regarding Kansas Gas Service, Mar. 30, 2018, ¶ 19.
[13] K.S.A. 66-101b.
[14] *Kansas Gas*, 239 Kan. at 490.
[15] *Id.*

11. The Commission finds that approval of the Settlement Agreement is in the public interest. The Signatories agree the terms of the Settlement Agreement are in the public interest and should be approved by the Commission.[16] The Signatories explain the terms of the Settlement Agreement represent an equitable balancing of the interests of all parties.[17]

12. The Commission finds the agreed-upon process to determine the TCJA's impact on rates will provide Kansas Gas Service sufficient revenue to meet its financial obligations and provide safe and reliable service at just and reasonable rates to its customers. After considering all of the terms of the Settlement Agreement, the Commission finds it is in the public interest. The Settlement Agreement is a balanced agreement that is fair to all of the parties. Therefore, the Commission finds the proposed process to determine the TCJA's impact on rates is fair and reasonable, and is in the public interest.

13. After a careful review and consideration of the evidence in the record, the Commission finds that the attached Settlement Agreement is supported by substantial competent evidence in the record as a whole, will result in just and reasonable rates, and is in the public interest. The Commission approves the Settlement Agreement in its entirety.

THEREFORE, THE COMMISSION ORDERS:

A. The Joint Motion for Approval of the Settlement Agreement Regarding Kansas Gas Service is granted. The Commission approves the Settlement Agreement in its entirety. The terms of the attached Settlement Agreement are incorporated into this Order.

[16]Joint Motion for Approval for Approval of Settlement Agreement Regarding Kansas Gas Service, ¶ 21.
[17]*Id.*

B. The parties have 15 days from the date this Order was electronically served to petition for reconsideration.[18]

C. The Commission retains jurisdiction over the subject matter and parties for the purpose of entering such further orders as it deems necessary.

BY THE COMMISSION IT IS SO ORDERED.

Albrecht, Chair; Emler, Commissioner; Keen, Commissioner.

Dated: 05/15/2018.

Lynn M. Retz

Lynn M. Retz
Secretary to the Commission

BGF

[18] K.S.A. 66-118b; K.S.A. 529(a)(1).

EXHIBIT A

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation Regarding the Effect of Federal Income Tax Reform on the Revenue Requirements of Kansas Public Utilities and Request to Issue an Accounting Authority Order Requiring Certain Regulated Public Utilities to Defer Effects of Tax Reform to a Deferred Revenue Account.	)))))))	Docket No. 18-GIMX-248-GIV

SETTLEMENT AGREEMENT

Kansas Gas Service, A Division of ONE Gas, Inc. ("Kansas Gas Service"), the Staff of the Kansas Corporation Commission ("Commission") ("Staff") and the Citizens' Utility Ratepayer Board ("CURB") (collectively "Joint Movants"), pursuant to K.A.R. 82-1-230a, enter into the following Settlement Agreement ("Agreement"), which if approved by the Commission would address all issues in the above-captioned docket as it relates to Kansas Gas Service.

I. BACKGROUND

1. On December 14, 2017, Staff filed a Motion to Open a General Investigation and Issue Accounting Authority Order Regarding Federal Tax Reform ("Staff Motion"). Staff attached a Report and Recommendation ("Staff's R&R") to the Staff Motion, which recommended the Commission issue an Order addressing the following:

a. Opening a general investigation for the purpose of examining the financial impact of anticipated federal income tax reform on regulated public utilities operating in Kansas;

b. Requiring, through the use of an Accounting Authority Order ("AAO"), certain regulated public utilities that are taxed at the corporate level, (which included Kansas Gas Service), to track and accumulate in a deferred revenue account, with interest compounded monthly at the most current Commission-approved customer deposit interest rate, the reduction in their regulated cost of service that would occur in the event that a new lower federal income tax rate is signed into law. These deferrals should take effect at the same time as the new federal corporate tax rate change and the calculations should be performed using the cost of service data that was used to set the utilities' last Commission-approved revenue requirement (including any line-item surcharges that contain a provision for regulated income tax expense); and

c. Confirming that the Commission's intention regarding the AAO is to preserve any potential tax benefits so that they may be evaluated in the context of a comprehensive evaluation of the reasonableness of the utilities' rates as well as notifying utilities that this portion of their rates should be considered interim subject to refund until the Commission has the opportunity to review the reasonableness of the utilities' rates on a comprehensive and case-by-case basis and confirming that the Commission intends to capture the reduction in Accumulated Deferred Income Tax ("ADIT") balances that will occur in the event that a lower corporate federal income tax rate takes effect, over time, in a manner that comports with Internal Revenue Services ("IRS") Tax Normalization Rules.

2. The Staff Report referred to and provided a copy of the order issued by the Commission in Docket No. 155,094-U dated March 18, 1987, relating to the effects of the Federal Tax Reform Act of 1986 ("1987 Order") and suggested that its recommendation in the current docket was consistent with the 1987 Order.

3. On December 22, 2017, the Tax Cuts and Jobs Act ("TCJA") was signed into law. Among other things, the TCJA reduced the federal corporate income tax rate from 35% to 21% beginning on January 1, 2018.

4. On December 22, 2017, CURB filed a Petition to Intervene and a Response in Support of Staff's Motion.

5. On January 18, 2018, the Commission issued its *Order Opening General Investigation and Issuing Accounting Authority Order Regarding Federal Tax Reform* ("Order"). In said Order the Commission made the following findings and conclusions:

a. The TCJA has the potential to significantly reduce the cost of service for many utilities operating in Kansas since tax expenses are recovered in rates.

b. A significant reduction to the corporate tax rate may also impact the ADIT Liabilities and Assets on the regulated books of utilities.

c. An investigation into the impact of the TCJA on utility rates is warranted.

d. The 1987 Order issued by the Commission relating to the effects of the Federal Tax Reform Act of 1986, is informative but not precedential.

e. The purpose of the investigation is to quantify the economic impacts of the new lower tax rates on Kansas utilities, and where appropriate, direct that any cost savings be passed on to Kansas utility customers.

f. All regulated public utilities that are taxable at the corporate level are directed to accrue monthly, in a deferred revenue account, the portion of its revenues representing the difference between (1) the cost of service approved by the Commission in its most recent rate case; and (2) the cost of service that would have resulted had the provision for federal income taxes been based upon the corporate income tax rate approved in the TCJA.

g. Taxable utilities operating in Kansas are notified that the portion of their regulated revenue stream that reflects higher corporate tax rates should be considered interim and subject to refund, with interest calculated at the rate being used for interest paid on customer deposits, until the Commission can more fully evaluate on a case-by-case basis the impact of the TCJA.

h. Upon the Commission completing its case-by-case evaluation, if it is determined that a rate decrease is proper and would have been proper as of the January 1, 2018, effective date of the TCJA, any excessive collections in the deferred revenue subaccount, or other appropriate tracking mechanism approved by the Commission, with appropriate adjustments, shall be refundable to customers with interest. Any balance remaining in the account shall be credited to the utility's operating revenue.

i. The Commission intends to capture excess ADIT for the benefit of customers using a methodology that is consistent with the tax normalization requirements specified in the tax legislation or IRS Tax Normalization Rules, as applicable.

j. Any affected utility that believes other components of their cost of service have more than offset the decrease in its income tax expenses will have the ability to file such information and supporting data with the Commission, to be considered on a case-by-case basis. The Commission's intention here is not to materially impact regulated utilities' profitability, but rather, ensure that the affected utilities are neither positively nor negatively impacted by the passage of federal income tax reform.

k. The Commission adopts the Staff's R&R and incorporates it into the Order.

6. On January 31, 2018, Kansas Gas Service filed its entry of appearance in this docket.

7. On February 12, 2018, the Joint Movants met in Topeka to discuss and attempt to reach agreement to establish a procedure to be used in Kansas Gas Service's upcoming general rate case filing to quantify the economic impacts of the new lower tax rates on Kansas Gas Service's operations based upon the instructions provided by the Commission in its Order and how cost savings related to the lower tax rates should be passed on to Kansas Gas Service's customers with interest. The Joint Movants also discussed how Kansas Gas Service should capture excess ADIT for the benefit of its customers using a method that is consistent with the tax normalization requirements specified in the tax legislation or IRS Normalization Rules, as applicable. As a result of said meeting and follow-up discussions among the Joint Movants, the Joint Movants were able to reach the following Agreement.

II. TERMS OF AGREEMENT

A. KANSAS GAS SERVICE TO ESTABLISH A REGULATORY LIABILITY TO ACCOUNT FOR THE TCJA'S LOWERING OF THE FEDERAL INCOME TAX RATE FROM 35% TO 21%

8. As indicated above, the Commission stated that in order to quantify the economic impacts of the new lower tax rates on Kansas utilities the calculation should be based upon the difference between (1) the cost of service approved by the Commission in the utility's most recent rate case; and (2) the cost of service that would have resulted had the provision for federal income taxes been based upon the corporate income tax rate approved in the TCJA and said amount should be accrued monthly.[1] For the period of time between January 1, 2018, and through the date on which the Commission issues a final order in Kansas Gas Service's next general rate case, the timing of which is discussed in the terms of this Agreement, Kansas Gas Service agrees to accrue monthly, as a regulatory liability on its general ledger and stand ready to credit its customers for the amount

[1] Order, page 5, ¶7.

determined to be due to customers at the conclusion of the general rate case that portion of its revenue representing the difference between: (1) the cost of service as approved by the Commission in its most recent rate case, Docket No. 16-KGSG-491-RTS ("491 Docket"); and (2) the cost of service that would have resulted had the provision for federal income taxes been based upon the corporate income tax rate approved in the TCJA, including the impact the TCJA would have on Kansas Gas Service's GSRS surcharge and interest. The Joint Movants agree that based solely upon items one and two above, the monthly amount to be accrued as a regulatory liability exclusive of any calculated interest shall be as set forth in Appendix 1 to the Agreement. The Joint Movants further agree that the interest rate applied to the amount shall be calculated at the rate being used for interest paid on customer deposits, which is currently 1.62%. The disposition of the amount accrued as a regulatory liability shall be determined by the Commission in its final order issued at the completion of Kansas Gas Service's next general rate case filing. Kansas Gas Service's agreement to accrue as a regulatory liability the amount calculated herein shall not be considered as any type of concession on the part of Kansas Gas Service and its position that other components of its cost of service, including the return on and of its capital investments, should be considered in reducing or offsetting the decrease in its income tax expenses and Kansas Gas Service intends to utilize the provision in the Order that allows the utility the ability to file such information and supporting data with the Commission in the upcoming rate case to prove the tax savings amount accrued as a regulatory liability should be reduced or offset by other components of its cost of service before determining whether any amount should be credited to customers. Under this Agreement, Kansas Gas Service reserves its right to provide information and supporting data to the Commission in its upcoming general rate case to show other components of its cost of service offset the decrease in its income tax expense, and therefore, the amount being accrued as a regulatory liability should be reduced or offset by the other components of its cost of service that have increased. In entering into this Agreement, Staff and CURB reserve their rights to challenge Kansas Gas Service's position that other components of its cost of service should be used to offset the decrease in Kansas Gas Service's income tax expenses. A copy of Kansas Gas Services' calculation of the amount being accrued as a regulatory liability, with interest, is attached to this Agreement as Appendix 1. Said calculation has been reviewed and verified by Staff.

B. KANSAS GAS SERVICE SHALL ESTABLISH A REGULATORY LIABILITY TO ACCOUNT FOR THE IMPACT OF THE TCJA ON THE UTILITY'S EXCESS ADIT

9. As indicated above, the Commission in its Order stated its intent was also to capture the impact of the TCJA on the utility's excess ADIT for the benefit of customers using a methodology that is consistent with the tax normalization requirements specified in the tax legislation or IRS Normalization Rules.[2] Under this Agreement, Kansas Gas Service agrees it will also establish a regulatory liability to account for and capture the impact of the TCJA on the utility's excess ADIT and will provide evidence of such to Staff and CURB. Joint Movants have agreed to defer any issues regarding the impact of the TCJA on the utility's excess ADIT to Kansas Gas Service's next general rate case filing with the understanding and concurrence by the Joint Movants that Kansas Gas Service's customers are entitled to the benefits of the tax savings relating to the utility's excess ADIT.

10. Joint Movants also agree Kansas Gas Service will not start amortizing the excess ADIT as of December 31, 2017, until the excess ADIT is reflected in base rates as approved by the Commission in Kansas Gas Service's next general rate case filing.

11. Under this Agreement, Kansas Gas Service agrees to file a general rate case no later than 150 days from the date of a Commission order approving this Agreement. Kansas Gas Service

[2] Order, page 6, ¶8.

further agrees to include in its general rate case filing the impact of the TCJA on the utility's excess ADIT, if any, that should be included in base rates; its calculation of tax savings relating to the reduced tax expense resulting from the lower corporate tax rate in the TCJA that should be included in new base rates following the general rate case decision; and its proposed plan to account for any portion of the amount being accrued as a regulatory liability, subject to the provisions and reservation of rights by the Joint Movants discussed in paragraph 8 in this Agreement.

C. GENERAL PROVISIONS

12. The Joint Movants agree the terms in this Agreement, if approved by the Commission, shall apply only to Kansas Gas Service and shall not be binding on Staff, CURB or the Commission in reviewing or approving any other proposal or agreement submitted by any other public utility in this docket or ordered by the Commission in this or any other docket.

13. Staff and CURB specifically reserve their respective rights to make all arguments and to take positions that are different than what they have agreed to in this Agreement for Kansas Gas Service with respect to proposals relating to the TCJA submitted by other public utilities for approval by the Commission.

14. Nothing in this Agreement is intended to impinge or restrict, in any manner, the exercise by the Commission of any statutory right, including the right of access to information, and any statutory obligation, including the obligation to ensure that Kansas Gas Service is providing efficient and sufficient service at just and reasonable rates.

15. This Agreement represents a negotiated settlement that resolves the issues in this docket as it relates to Kansas Gas Service only. The Joint Movants represent that the terms of the Agreement constitute a fair and reasonable procedure to be used by the Joint Movants in Kansas Gas Service's upcoming rate case to address the issues raised in the Commission's Order as they relate to Kansas Gas Service only. Except as specified herein, the Joint Movants shall not be prejudiced, bound by, or in any way affected by the terms of this Agreement (a) in any future proceeding; (b) in

any proceeding currently pending under a separate docket; and/or (c) in this proceeding should the Commission decide not to approve this Agreement in the instant proceeding. If the Commission accepts this Agreement in its entirety and incorporates the same into a final order without material modification, the Joint Movants shall be bound by its terms and the Commission's order incorporating its terms as to all issues addressed herein and in accordance with the terms hereof, and will not appeal the Commission's order on these issues.

16. The provisions contained in this Agreement have resulted from negotiations among the Joint Movants and are interdependent. In the event the Commission does not approve and adopt the terms of this Agreement in total, it shall be voidable and none of the Joint Movants shall be bound, prejudiced, or in any way affected by any of the agreements or provisions hereof. Further, in such event, this Agreement shall be considered privileged and not admissible in evidence and shall be withdrawn from the record in this proceeding and not made a part of the record in any other proceeding.

D. TESTIMONY IN SUPPORT OF THE AGREEMENT

17. The Joint Movants agree to file testimony in support of this Agreement within seven (7) days after the Motion is filed with the Commission. The testimony will address the five factors the Commission considers when evaluating a settlement agreement.

This Agreement is entered into this 29th day of March, 2018.

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Appendix 1

Summary

Monthly Amounts to be Accrued as a Regulatory Liability

January	2,068,579
February	1,633,329
March	1,500,615
April	866,237
May	804,053
June	792,995
July	791,338
August	783,029
September	773,309
October	854,265
November	1,433,920
December	1,824,833
Total Annual Deferral	14,126,503

Annual Amount to be Accrued as a Regulatory Liability

Regulatory Liability - Base Rates	$13,821,775
Regulatory Liability - GSRS	$304,728
Total Regulatory Liability	$14,126,503

Regulatory Liability - Base Rates

	35% Tax Rate 16-KGSG-491-RTS As Settled	21% Tax Rate 16-KGSG-491-RTS Restated
Rate Base		
Total Rate Base	$925,034,591	$925,034,591
Capital Cost		
Cost of Debt	3.955%	3.955%
Capitalization		
Debt	45.00%	45.00%
Equity	55.00%	55.00%
Weighted Cost of Debt	1.78%	1.78%
Cost of Service		
Interest on Debt		
All Other Expenses including O&M	$213,715,211	$213,715,211
Total Cost of Service Excl. Return and Taxes	$213,715,211	$213,715,211
Operating Revenue		
Revenue	$254,016,966	$240,195,191
Other Revenue	51,434,300	51,434,300
Total Adjusted Revenue	$305,451,266	$291,629,491
Income		
Income Before Income Taxes	$91,736,055	$77,914,280
Composite Income Tax	30,755,462	16,933,687
Net Income	$60,980,593	$60,980,593
Total Estimated ROE	8.75%	
	At 35% Federal Level	At 21% Federal Level
Composite Tax Rate	39.55%	26.53%
Regulatory Liability - Base Rates		$13,821,775

Regulatory Liability – GSRS

Gas System Replacement Surcharge

Exhibit 1

	(A)	(B)	(C)	(D)	(E)
Line No.	Summary	New GSRS Safety & Govt. Relocation Projects	New GSRS Blanket Work Orders	Grand Total	Source
1	Original Cost	$5,343,695	$22,704,255	$28,047,950	Exhibit 3
2	*Less: Accumulated Depreciation*	($80,674)	($330,947)	($411,621)	Exhibit 4
3	Net Plant in Service	$5,263,021	$22,373,308	$27,636,329	
4	*Less: Accumulated Deferred Income Taxes*	($1,096,277)	($4,928,154)	($6,024,431)	Exhibit 4
5	Net GSRS Rate Base	$4,166,744	$17,445,154	$21,611,898	
6	Carrying Charge [(1)]	9.74%	9.74%	9.74%	
7	Pre-Tax Required Return	$405,841	$1,699,158	$2,104,999	Line 5 * Line 6
8	Depreciation Expense	$100,748	$630,594	$731,342	Exhibit 5
9	GSRS Revenue Requirement (Annual)			$2,836,341	Line 7 + 8
10	Plus (Minus): Under-Recovered Balance from Docket No. 16-KGSG-104-TAR			$36,945	Exhibit 2
11	Revised GSRS Annualized Revenue Requirement			$2,873,286	Line 9 + 10
	Pre-Tax Required Return based on 21% Fed Tax Rate			8.33%	
	Recalculated Pre-Tax Required Return			$1,800,271	
	Return Decrease Related to change in Income Tax Collection			$304,728	

Monthly Amount to Accrue to Regulatory Liability

	2015.TOTAL	2015.JAN	2015 FEB	2015.MAR	2015 APR	2015.MAY	2015.JUN	2015.JUL	2015 AUG	2015.SEP	2015.OCT	2015.NOV	2015 DEC
Test Year Net Margin (Docket No. 16-KGSG-491-RTS)	286,558,276.92	41,961,435.46	33,132,338.75	30,440,203.29	17,571,756.73	16,310,330.59	16,086,028.32	16,052,418 22	15,883,862.91	15,686,693.91	17,328,901.53	29,087,280.73	37,017,026 48
Monthly % of Total Annual Net Margin		15%	12%	11%	6%	6%	6%	6%	6%	5%	6%	10%	13%
Tax Reform Regulatory Liability to Accrue by Month	14,126,503	2,068,579	1,633,329	1,500,615	866,237	804,053	792,995	791,338	783,029	773,309	854,265	1,433,920	1,824,833

CERTIFICATE OF SERVICE

18-GIMX-248-GIV

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of electronic service on 05/15/2018.

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