

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**APPLICATION OF DELTA NATURAL  
GAS COMPANY, INC. FOR AN  
ADJUSTMENT OF RATES**

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)

**CASE NO. 2010-00116**


**DIRECT TESTIMONY OF  
WILLIAM STEVEN SEELYE**

**PRINCIPAL & SENIOR CONSULTANT  
THE PRIME GROUP, LLC**

AFFIDAVIT

The affiant, William Steven Seelye, being duly sworn, deposes and states that the prepared testimony attached hereto and made a part hereof, constitutes the prepared direct testimony of this affiant in Case No. 2010-00116 in the Matter of: Application of Delta Natural Gas Company, Inc. for an Adjustment of Rates and that if asked the questions propounded therein, this affiant would make the answers set forth in the attached prepared direct testimony.

Affiant further states that he will be present and available for cross-examination and for such additional examination as may be appropriate at the hearing in Case No. 2010-00116 scheduled by the Commission, at which time affiant will further reaffirm the attached prepared testimony as his direct testimony in such case.

  
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WILLIAM STEVEN SEELYE

STATE OF KENTUCKY            )  
  )  
COUNTY OF ~~CLARK~~ Oldham )

Subscribed and sworn to before me by William Steven Seelye, this the 21<sup>st</sup> day of April, 2010.

My Commission Expires: 4-25-2013

  
\_\_\_\_\_  
Notary Public, State at Large, Kentucky

1 **Q. Please state your name and business address.**

2 A. My name is William Steven Seelye and my business address is The Prime Group, LLC, 6001  
3 Claymont Village Drive, Suite 8, Crestwood, Kentucky, 40014.

4 **Q. By whom are you employed?**

5 A. I am a senior consultant and principal for The Prime Group, LLC, a firm located in  
6 Crestwood, Kentucky, providing consulting and educational services in the areas of utility  
7 regulatory analysis, revenue requirement support, cost of service, rate design and economic  
8 analysis.

9 **Q. What is the purpose of your testimony in this proceeding?**

10 A. The purpose of my testimony is to sponsor Delta Natural Gas Company Inc.'s ("Delta's")  
11 proposed rates for natural gas service; to describe the proposed allocation of the revenue  
12 increase; to sponsor the fully allocated class cost of service study based on Delta's embedded  
13 costs for the 12 months ended December 31, 2009; to sponsor the temperature normalization  
14 adjustment; and to sponsor Delta's depreciation study supporting the proposed depreciation  
15 rates and the pro-forma adjustment to depreciation expenses.

16 **Q. Please summarize your testimony.**

17 A. Delta is proposing to increase base rate revenues by \$5,315,428. The Company has a large  
18 residential customer base, and, as a result, Delta is proposing to allocate \$3,541,111 or 67%  
19 of the increase to the residential class. The Company is proposing to collect these revenues  
20 in large part by increasing the residential customer charge. By recovering the residential  
21 increase largely through the customer charge, Delta is proposing to continue the movement  
22 undertaken in previous rate cases in the direction of a "Straight Fixed Variable" rate design,  
23 which is a methodology that has been adopted in other regulatory jurisdictions. More

1 specifically, Delta is proposing to recover through the monthly customer charge most of the  
2 customer-related costs identified in the cost of service study. The Prime Group prepared a  
3 fully allocated, embedded cost of service study for Delta's test-year operations using a cost of  
4 service methodology that has been accepted by the Commission in previous rate cases. The  
5 purpose of the cost of service study is to determine the contribution that each customer class  
6 is making towards Delta's overall rate of return. Rates of return are computed for each rate  
7 class. Delta was guided by the embedded cost of service study in allocating the proposed  
8 revenue increase to the classes of service. Delta is also proposing to make a temperature  
9 normalization adjustment to sales and transportation volumes not covered by the Company's  
10 Weather Normalization Adjustment ("WNA") clause. In addition, Delta is proposing to  
11 change a number of its depreciation rates based on the depreciation study included as an  
12 exhibit to my testimony.

13 **Q. How is your testimony organized?**

14 A. My testimony is divided into the following sections: (I) Qualifications, (II) Rate Design and  
15 the Allocation of the Increase, (III) Gas Cost of Service Study, (IV) Temperature  
16 Normalization Adjustment, (V) Revenue Adjustment to Reflect Year-End Customers, and  
17 (VI) Depreciation Study and Depreciation Expense Adjustment.

18 **Q. Are you sponsoring any Exhibits to your testimony?**

19 A. Yes. The exhibits that accompany my testimony in this proceeding are listed below.

- 20 Seelye Exhibit 1 Summary of Qualifications
- 21 Seelye Exhibit 2 Reconstruction of Billing Determinants
- 22 Seelye Exhibit 3 Summary of Proposed Increase
- 23 Seelye Exhibit 4 Calculated Billings at Proposed Rates



1	Seelye Exhibit 5	Cost of Service Study: Functional Assignment & Classification
2	Seelye Exhibit 6	Class Cost of Service Study: Allocation of Costs by Rate Class
3	Seelye Exhibit 7	Class Cost of Service Study: Storage Allocation Factor
4	Seelye Exhibit 8	Class Cost of Service Study: Zero Intercept Analysis
5	Seelye Exhibit 9	Temperature Normalization Adjustment
6	Seelye Exhibit 10	Year-End Customer Adjustment - Not Proposed
7	Seelye Exhibit 11	Depreciation Study

8

9 **I. QUALIFICATIONS**

10 **Q. Please describe your educational background and prior work experience.**

11 A. I received a Bachelor of Science degree in Mathematics from the University of Louisville in  
12 1979. I have also completed 54 hours of graduate level course work in Industrial  
13 Engineering and Physics. From May 1979 until July 1996, I was employed by Louisville Gas  
14 and Electric Company (“LG&E”). From May 1979 until December, 1990, I held various  
15 positions within the Rate Department of LG&E. In December 1990, I became Manager of  
16 Rates and Regulatory Analysis. In May 1994, I was given additional responsibilities in the  
17 marketing area and was promoted to Manager of Market Management and Rates. I left  
18 LG&E in July 1996 to form The Prime Group, LLC, with two other former employees of  
19 LG&E.

20 Since leaving LG&E, I have performed cost of service and rate studies for over 150  
21 investor-owned utilities, rural electric cooperatives, and municipal utilities. I have also  
22 developed or modified fuel and purchased power adjustment mechanisms for numerous  
23 electric and gas utilities, including integrated investor-owned utilities, integrated municipal

1 utilities and distribution cooperatives. A more detailed description of my qualifications is  
2 included in Seelye Exhibit 1.

3 **Q. Have you ever testified before any state or federal regulatory commissions?**

4 A. Yes, on many occasions. I have testified in over 50 regulatory proceedings in 11 different  
5 jurisdictions. A listing of my testimony is included in Seelye Exhibit 1.

6  
7 **II. RATE DESIGN AND THE ALLOCATION OF THE INCREASE**

8 **Q. Is Delta proposing to change the relationship between the customer charge and**  
9 **volumetric charge for the residential rate class?**

10 A. Yes. The Company is proposing a significant increase in its customer charge. Delta has a  
11 traditional residential base rate design consisting of a customer charge and a volumetric  
12 charge. This type of rate design is referred to as a “two-part” rate. Under this design, a  
13 portion of Delta’s non-gas costs are collected through a monthly fixed customer charge,  
14 which does not vary with usage, and a portion of the costs are collected via a volumetric  
15 charge applied to each unit of natural gas used. Delta’s residential customer charge is  
16 currently \$15.30 per month (not including the \$0.20 per month collected under Delta's  
17 Energy Assistance Program Tariff Rider) and the non-gas volumetric charge is \$0.41580 per  
18 Ccf (or \$4.1580 per Mcf). Gas costs are recovered through the Gas Cost Recovery Rate  
19 (GCR), which is a volumetric charge.

20 Some regulatory jurisdictions have shifted from a traditional two-part rate design to a  
21 design in which *all* non-gas costs are recovered through a fixed monthly customer charge.  
22 This type of rate structure is referred to as a “Straight Fixed Variable” rate design. This rate  
23 design evolved from pipeline rate designs that recovered all fixed costs through a fixed

1 charge and all variable costs through a volumetric charge. Because non-gas costs are *fixed*  
2 for a gas distributor, and do not vary with the amount of gas purchased by its customers, all  
3 non-gas costs are recovered through a *fixed* monthly customer charge under a Straight Fixed  
4 Variable rate structure.

5 **Q. Please describe the Straight Fixed Variable rate design further.**

6 A. Under a Straight Fixed Variable rate design, a gas utility eliminates in its entirety the  
7 distribution cost component of the volumetric rate, and increases the fixed monthly customer  
8 charge accordingly. By recovering its fixed distribution costs fully through a fixed monthly  
9 charge, a utility severs the relationship between its natural gas delivery revenue (revenue less  
10 the cost of gas) and its sales of natural gas. This insulates a utility's income from changes in  
11 sales per customer.

12 Utilities implement a Straight Fixed Variable rate design for several reasons. Some of  
13 the more prevalent reasons to adopt Straight Fixed Variable rates are:

- 14 • A Straight Fixed Variable rate design is a simple form of decoupling, which many  
15 environmental and conservation advocates consider to be a cornerstone to the  
16 implementation of comprehensive energy conservation programs.
- 17 • A Straight Fixed Variable rate design removes all incentives for the Company to  
18 encourage customers to use more natural gas.
- 19 • A Straight Fixed Variable rate design reflects the cost of providing natural gas delivery  
20 service and sends the appropriate price signal to customers.
- 21 • Because low-income customers typically use more gas than the average customer, a  
22 Straight Fixed Variable rate design will remove the subsidy that low-income customers  
23 are providing to other residential customers.



- 1 • Through the implementation of a Straight Fixed Variable rate design, the volatility of
- 2 customers' bills will be reduced.
- 3 • A Straight Fixed Variable rate design is easy for customers to understand.
- 4 • Adopting a Straight Fixed Variable rate design typically enhance the viability of gas
- 5 distribution operations as a business.
- 6 • Straight Fixed Variable rate designs have been implemented in a number of progressive
- 7 regulatory jurisdictions and are being considered in many others.
- 8 • A Straight Fixed Variable rate design is consistent with emerging national energy
- 9 policy.

10 **Q. Has a Straight Fixed Variable rate design been adopted in other jurisdictions?**

11 A. Yes. The Missouri Public Service Commission ("Missouri Commission") adopted a Straight  
12 Fixed Variable rate design for Atmos Energy Corporation (*Case No. GR-2006-0387*, Order  
13 dated February 22, 2007) and Missouri Gas Energy, a division of Southern Union Company  
14 (*Case No. GR-2006-0422*, Order dated March 22, 2007). The Straight Fixed Variable rate  
15 design was proposed by the Missouri Commission Staff in the Atmos proceeding. A Straight  
16 Fixed Variable rate design is also used by the Atlanta Gas Light Company in Georgia.

17 In the Atmos Proceeding, the Missouri Commission accepted the Staff's  
18 recommendation to eliminate the traditional two-part rate structure and to adopt instead a  
19 Straight Fixed Variable design because collecting fixed costs through a volumetric charge:

- 20 a) Creates unnecessary volatility in customer bills by
- 21 collecting too much cost in the winter months;
- 22 b) Sends incorrect price signals to residential customers;



- 1 c) Forces residential customers whose usage is greater than  
2 the average to pay more than the cost of service, while  
3 allowing smaller customers to pay less than the cost of  
4 service;
- 5 d) Provides no incentive for the utilities to promote  
6 conservation.

7 (*Atmos Energy Corporation, Case No. GR-2006-0387, Order dated February 22, 2007, pp.*  
8 *19-20.*)

9 More recently, the Public Utilities Commission of Ohio ("Ohio Commission")  
10 authorized Vectren Energy Delivery of Ohio to transition to a Straight Fixed Variable rate  
11 design over a 12-month period. (*Vectren Energy Delivery of Ohio, Case No. 07-1080-GA-AIR;*  
12 *Case No. 07-1081-GA-ALT; Case No. 08-632-GA-AAM, Order dated January 7, 2009.*) In that  
13 proceeding the Ohio Commission Staff argued that Straight Fixed Variable rates are  
14 "reasonable, understandable, and send the proper price signals to customers." (*Id.*, at 22.) The  
15 Ohio Commission found that a Straight Fixed Variable rate design "promotes the regulatory  
16 principles of providing a more equitable allocation among customers, regardless of usage. It  
17 fairly apportions the fixed costs of service among all customers so that everyone pays their fair  
18 share." (*Id.*, at 30.) The Ohio Commission also concluded that a Straight Fixed Variable rate  
19 design sends a better price signal, stating as follows:

20 [T]he Commission believes that a levelized rate design sends better price  
21 signals to consumers. The possible response of consumers to an increase in  
22 the customer charge, i.e., dropping gas service entirely and switching to a  
23 different fuel, is much less likely to occur than consumers changing their  
24 level of gas usage in response to a change in the volumetric rates. When a  
25 utility is entitled to recover costs in excess of its costs for providing the  
26 next increment of gas service, a more economically efficient rate design is

1 one that recovers these additional costs largely through a change that has  
2 little impact on consumer behavior.

3  
4 Customers will not be misled into believing that reductions in consumption  
5 will allow them to avoid the fixed costs of the distribution system, as feared  
6 by Staff. However, the commodity costs comprise 75 to 80 percent of the  
7 total bill. (TR. III at 68). Therefore, we believe that the gas usage will still  
8 have the biggest influence on the price signals received by customers when  
9 making gas consumption decisions and that customers will still receive the  
10 appropriate benefits of any conservation efforts. (*Id.*, at 25-26.)  
11

12 In Kentucky, Straight Fixed Variable rates have also been proposed by Duke Energy  
13 Kentucky, Inc. (Case No. 2009-00202) and by Columbia Gas of Kentucky, Inc. (Case No.  
14 2009-00141). While both of those cases settled without Straight Fixed Variable rate designs,  
15 the parties agreed to, and the Commission approved, significant increases in their residential  
16 customer charges. Additionally, LG&E recently proposed Straight Fixed Variable rates in  
17 Case No. 2009-00549, a proceeding that is open before the Commission at this time.

18 **Q. Are there any reasons for gas utilities not to adopt Straight Fixed Variable rate**  
19 **design?**

20 A. Yes. While the reasons listed above for adopting Straight Fixed Variable rates are sound,  
21 utilities may elect not to adopt Straight Fixed Variable rates in order to avoid rate shock.  
22 Instead, they may adopt an incremental approach over several rate cases with movement  
23 in the direction of increasing fixed charges to appropriately reflect fixed costs. This is  
24 consistent with accepted ratemaking practices and with the principle of gradualism.

25 **Q. Is Delta proposing a Straight Fixed Variable rate design?**

26 A. No. Although Delta is not recommending a Straight Fixed Variable rate design, the  
27 Company is proposing to continue the significant movement in that direction undertaken in  
28 its last rate case. Specifically, Delta is proposing to set the volumetric charge close to the



1 current level and recover nearly all of the residential revenue increase in the customer charge.

2 Under a Straight Fixed Variable design the non-gas volumetric charge would be eliminated  
3 and all of Delta's non-gas costs would be recovered through the monthly customer charge.

4 Although Delta's proposed residential rate will fall far short of recovering all fixed  
5 costs in the customer charge, it will come reasonably close to recovering the customer-related  
6 costs identified in the fully allocated class cost of service study submitted in this proceeding.

7 In the cost of service study, Delta's non-gas fixed costs are classified as either customer-  
8 related or demand-related. With a Straight Fixed Variable rate design adopted in Missouri,  
9 Georgia, and Ohio, all of these costs – both customer-related and demand-related fixed costs  
10 – would be recovered through the monthly customer charge. In this proceeding Delta is  
11 proposing to recover most – but not all – of its customer-related costs through the monthly  
12 customer charge. Delta's customer-related cost for residential customers is currently \$27.72  
13 per month. However, the Company is only charging \$15.30 per month, or 55% of the  
14 customer-related costs that were identified in the cost of service study. In this proceeding,  
15 Delta is proposing to increase the monthly customer charge to \$24.00, which represents 87%  
16 of the customer-related costs identified in the cost of service study. Although this increase in  
17 the customer charge is less than it would be with Straight Fixed Variable rate design, Delta's  
18 proposal is a significant shift in that direction.

19 **Q. What would the proposed customer charge be if a Straight Fixed Variable rate design**  
20 **were adopted?**

21 A. Under a Straight Fixed Variable rate design, the fixed monthly customer charge for the  
22 residential class would be \$43.77.

23

1 **Q. What are the benefits of recovering most of the customer-related costs through the**  
2 **customer charge?**

3 A. Recovering more of Delta's customer-related costs through the fixed monthly customer  
4 charge will better reflect the actual cost of service through rates and will thus send a more  
5 accurate price signal to customers. In addition, Delta's proposed customer charge will reduce  
6 the volatility in customer bills by lowering the amount charged during the winter.

7 The Company's proposal will also eliminate rate subsidies within the residential  
8 customer class. Currently, customers with lower than average usage are being subsidized by  
9 customers with higher than average usage. Based on data that I have seen from other gas  
10 utilities, including a gas utility in the region, low income customers – contrary to a common  
11 misconception – tend to purchase more gas than the average customer. One likely reason for  
12 this is that low income customers often have poorly insulated homes, which causes their gas  
13 usage to be higher than the average even though their homes may have less square footage  
14 than the average. When customer-related costs are recovered through the volumetric charge,  
15 low income customers who use more than the average will subsidize customers who use less  
16 natural gas than the average.

17 Yet another advantage of Delta's proposal – and one which should be an important  
18 consideration for the Company – is that a higher customer charge should help mitigate the  
19 erosion in margins that Delta has been experiencing for a number of years. Delta's average  
20 Mcf per customer has been trending down for many years now. Since 2000, the average  
21 residential usage has gone from 75 Mcf per customer in 2002 to 55 Mcf in 2009. This  
22 decline in average consumption will continue to exacerbate the earnings erosion as long as  
23 customer-related costs are included in the volumetric charge.



1           Because a large percentage of Delta's fixed costs have been recovered through a  
2 volumetric charge, the decline in customer usage has the effect of reducing the recovery of  
3 fixed costs and eroding the Company's earnings. Delta has not had an opportunity to earn  
4 the rate of return on equity authorized by the Commission in Delta's last three rate cases, and  
5 decreasing sales volumes have contributed heavily to this trend. This is discussed in detail in  
6 the testimony of Dr. Blake. Recovering more fixed costs through the customer charge should  
7 help mitigate this erosion in earnings.

8   **Q. Will the proposed rate design better position the Company to encourage conservation**  
9   **on the part of customers?**

10 A. Yes. Recovering a significant portion of fixed costs through a volumetric charge works to  
11 penalize the Company when customers conserve. Essentially all of Delta's non-gas costs are  
12 fixed and do not vary as customer volumes go up or down. With a significant portion of  
13 fixed costs recovered through volumetric charges, the Company's financial results are  
14 adversely affected from consumer conservation. Because Delta is not proposing to eliminate  
15 the volumetric charge for non-gas costs through the adoption a Straight Fixed Variable rate  
16 design, the Company's non-gas related revenues will continue to decline as a result of  
17 conservation, but not nearly as much as they would if Delta had proposed an increase in the  
18 volumetric charge. Thus increasing the customer charge will help maintain Delta's financial  
19 integrity while encouraging customers to use less natural gas.

20 **Q. Have you prepared an exhibit reconstructing Delta's test-year billing units?**

21 A. Yes. In order to develop Delta's proposed rates it was necessary to reconstruct test-year billing  
22 units. The reconstruction of Delta's billing determinants is shown on Seelye Exhibit 2.

1 **Q. After considering all of the required adjustments, what is the proposed increase in**  
2 **revenues and how is the increase apportioned to the individual customer classes?**

3 A. Delta is proposing to increase its annual revenues by \$5,315,428. As shown on Seelye Exhibit  
4 3, this amount would result in an increase of 11.54% in total operating revenue.

5 Delta is not proposing to increase the collection charge, reconnection charge, or bad  
6 check charge, so there is no proposed increase in miscellaneous revenue.

7 The proposed rates apportion the revenue increase among the customer classes as  
8 follows:

<b>TABLE 1</b>		
<b>Proposed Gas Increase</b>		
<b>Customer Class</b>	<b>Proposed Increase</b>	<b>Percentage Increase</b>
<b>Residential</b>	\$ 3,538,987	15.85%
<b>Small Non-Residential</b>	593,145	9.17%
<b>Large Non-Residential</b>	668,559	7.27%
<b>Unmetered Gas Lights</b>	448	4.31%
<b>On-System Transportation</b>	261,259	6.31%
<b>Off-System Transportation</b>	253,030	7.41%
<b>Total Sales and Transportation</b>	\$ 5,315,428	11.54%

9  
10 As shown on Seelye Exhibit 4, the effects on individual class revenues were determined by  
11 applying both the current and proposed charges to the adjusted billing determinants for each  
12 customer class.

13 **Q. What was the basic underlying information that supported the proposed allocation**  
14 **among rate classes?**

15 A. The cost of service study provided information measuring the extent to which the revenues  
16 generated by each customer class contribute to the overall return earned by the Company. The  
17 cost of service study indicates that the individual class rates of return ranged between 3.44%



1 and 15.08% as compared to an overall adjusted actual return on rate base of 4.79%, with  
2 residential being the lowest (excluding special contracts). This indicates a need to increase the  
3 revenues collected from the residential class more than the other classes. The rates of return for  
4 all of the rate classes except the special contracts were measurably higher than for residential.  
5 The cost of service study also showed that the earned return for the interruptible rates were  
6 extremely high when compared to the other classes of service. This is also true, albeit to a  
7 lesser degree, for the off-system transportation rate.

8 Because the rate of return for the residential class is significantly below Delta's  
9 proposed overall rate of return of 8.66%, Delta is proposing to increase the residential rate by a  
10 larger percentage than the other classes in order to bring the residential rate of return more in  
11 line with the overall rate of return. The proposed rate of return for the residential rate is 8.19%.

12 The special contracts are served under fixed-price arrangements; therefore, none of the  
13 revenue increase will be allocated to these customers.

14 Delta does not propose to increase the rates for the interruptible rate class because of the  
15 high rates of return for this rate class. With a rate of return of 15.08% for interruptible service,  
16 a rate increase for this rate class cannot be justified.

17 Delta is proposing increases for the small and large non-residential rate classes that will  
18 result in rates of return of 9.21% and 10.64 %, respectively, based on the results of the cost of  
19 service study. The Company is also proposing an increase in the off-system transportation rate  
20 that will produce a rate of return of approximately 7.26%.

21 **Q. Is it important to consider competitive issues when designing rates?**

22 A. Yes. It is extremely important to take into consideration the competitive pressures facing the  
23 utility when designing rates. Utility customers have many more options than they did in the

1 past, and they are also becoming more sophisticated in how to utilize the various competitive  
2 products that are now available to them. However, the natural gas industry has always  
3 experienced keen competition from alternative fuels. When customers have alternatives (and  
4 the ability to substitute fuel oil for natural gas is only one example), gas distribution companies  
5 must be able to ensure that the revenues contributed by these customers are retained as long as  
6 they make some contribution to the utility's fixed costs. Industrial and commercial customers  
7 generally have more options than residential customers. Therefore, it is important not to charge  
8 rates to commercial and industrial customers that are not competitive and/or exceed the cost of  
9 providing service. Otherwise, large commercial and industrial customers will leave the system,  
10 forcing residential and small commercial customers, who have fewer options, to pay for fixed  
11 costs that are left stranded by the departing customers. Unlike volumetric costs, such as the  
12 cost of the gas commodity that a distribution company buys for its customers, a utility's fixed  
13 costs generally do not disappear if it sells less gas, but instead are spread over a lower volume  
14 of gas, thus causing the utility's rates to increase. Therefore, if a utility loses several large high-  
15 load factor industrial customers, then the utility's fixed costs do not suddenly disappear but are  
16 shifted to the remaining customers in future rate proceedings. On the other hand, if the utility  
17 can attract high-load factor customers or, even better, customers with off-peak usage, then the  
18 utility's fixed costs can be spread over a larger volume of gas, thus causing gas rates to go  
19 down, benefiting all customers.

20 **Q. Are the competitive issues outlined above especially relevant to Delta?**

21 A. Yes, for two reasons. First, Delta serves a customer base that is both rural and residential. This  
22 means that overall consumption and customer count are both lower than they would otherwise  
23 be if the utility served a more urban or industrial service territory -- which means costs are



1 spread across comparatively fewer users with less consumption. Second, the electric provider  
2 in Delta's service territory is Kentucky Utilities Company, which has electric rates that are  
3 among the lowest in the region. This affords customers a viable, attractive, economic option  
4 for meeting their energy needs with electricity rather than natural gas. These specific  
5 circumstances for Delta only serve to augment the reasons why it is important for Delta to keep  
6 the rates as competitive as possible while considering the cost of serving these customers.

7 **Q. What were the ratemaking objectives in developing the proposed gas rates?**

8 A. As explained earlier, the broad aim in rate design is to develop rates that more closely reflect  
9 the cost of providing service. Therefore, one of the key objectives was to bring the unit charges  
10 more in line with the unit costs derived from the cost of service study. Thus, the proposed rates  
11 move the charges toward the unit costs indicated by the cost of service study.

12 **Q. Have you analyzed the customer-related costs for Delta's rate classes?**

13 A. Yes. Page 20 of Seelye Exhibit 6 shows the unit customer-related costs for each rate class  
14 based on the results of the cost of service study. The customer-related cost for each rate class  
15 was derived by calculating the customer-related cost of service, or "revenue requirement,"  
16 and dividing this amount by the number of customers. Delta's cost of service includes (1)  
17 return on investment, (2) income taxes, (3) operation and maintenance expenses, (4)  
18 depreciation expenses, and (5) other taxes. The proposed overall rate of return of 8.66%  
19 was used to calculate the unit cost.

20 **Q. What are the proposed unit charges for the residential rate class?**

21 A. Delta is proposing a customer charge of \$24.00 per customer per month and a flat commodity  
22 charge of \$0.43344 for all Ccf. The current rate consists of a customer charge of \$15.30 and  
23 commodity charge of \$0.41580 per Ccf.

1 **Q. What are the proposed unit charges for the small non-residential rate class?**

2 A. Delta is proposing a customer charge of \$35.00 per customer per month and a flat commodity  
3 charge of \$0.43344 for all Ccf. The current rate consists of a customer charge of \$25.00 and  
4 commodity charge of \$0.41580 per Ccf.

5 **Q. What are the proposed unit charges for the large non-residential rate class?**

6 A. Delta is proposing a customer charge of \$150.00 per customer per month and a commodity  
7 charge of \$0.43344 for the first 2,000 Ccf, \$0.26855 for the next 8,000 Ccf, \$0.18894 for the  
8 next 40,000 Ccf, \$0.14894 for the next 50,000 Ccf, and \$0.12984 for all usage over 100,000  
9 Ccf. The first block was set at the same level as the first block in the small non-residential rate,  
10 and the current charge differentials between the blocks were maintained.

11 **Q. Is Delta proposing to modify the interruptible schedules?**

12 A. No. As indicated earlier, rate increases for these services cannot be justified in light of the high  
13 class rates of return.

14 **Q. Is Delta proposing to modify the unmetered gas lights schedules?**

15 A. Yes. Relatively small increases are proposed for the residential, commercial, and small  
16 commercial unmetered lights schedules, which collectively amount to a 4.3% increase over  
17 current rates.

18 **Q. Is Delta proposing to modify the on-system transportation rates?**

19 A. Yes. Delta's on-system transportation rates are net margin rates, wherein the on-system  
20 transportation rates have the same distribution delivery charges as the corresponding sales rates;  
21 therefore, the Company is proposing the same increase in net margins for its on-system  
22 transportation rates as for the underlying sales rates. Collectively, this amounts to a 6.3%  
23 increase over current rates.

1 **Q. Is Delta proposing to increase the off-system transportation rate?**

2 A. Yes. Delta is proposing to increase the off-system transportation rate from \$0.27 to \$0.29 per  
3 Mcf of gas transported, or in the case of measurement based on heating value, \$0.29 per  
4 dekatherm.

5

6 **III. GAS COST OF SERVICE STUDY**

7 **Q. Did you prepare a cost of service study for Delta's natural gas operations based on**  
8 **financial and operating results for the 12 months ended December 31, 2009?**

9 A. Yes. I supervised and participated in the preparation of a fully allocated, embedded cost of  
10 service study for natural gas service based on Delta's accounting costs per books, adjusted  
11 for known and measurable changes to test year operating results, for the 12 months ended  
12 December 31, 2009. The Commission has accepted in other rate case proceedings the  
13 methodology used in Delta's cost of service study. The objective in performing the cost of  
14 service study is to determine the rate of return on rate base that Delta is earning from each  
15 customer class, which provides an indication as to whether Delta's service rates reflect the  
16 cost of providing service to each customer class.

17 **Q. Have you ever prepared an embedded cost of service study?**

18 A. Yes, on many occasions. While employed at LG&E, I prepared numerous gas and electric  
19 cost of service studies, many of which were filed in rate cases before the Commission.  
20 Since leaving LG&E, I have prepared or supervised the preparation of well over 150  
21 embedded cost of service studies for electric, gas and water utilities. In Kentucky, I  
22 supervised and participated in the preparation of gas cost of service studies for Delta (Case



1 Nos. 99-176, 2004-00067, and 2007-00089) and LG&E (Case Nos. 2000-080, 2003-00433,  
2 2008-00252 and 2009-00549).

3 **Q. Was the same methodology used in the cost of service study submitted in this**  
4 **proceeding that was used in the cost of service study filed by Delta in Case No. 2007-**  
5 **00089?**

6 A. Yes. This is also the same methodology utilized by Delta in Case No. 2004-00067 and  
7 accepted by the Commission in that same proceeding in its Order dated November 10,  
8 2004.

9 **Q. Did you develop the model used to perform Delta's cost of service study?**

10 A. Yes. I developed the spreadsheet model used to perform the cost of service study being  
11 submitted in this proceeding.

12 **Q. What procedure was used in performing the cost of service study?**

13 A. The cost of service study was prepared using the following basic procedure: (1) costs were  
14 functionally assigned (*functionalized*) to the major functional groups, (2) costs were then  
15 *classified* as commodity-related, demand-related, or customer-related; and then (3) costs  
16 were allocated to Delta's rate classes. This is a standard approach utilized in the preparation  
17 of embedded cost of service studies for gas utilities.

18 **Q. What is the purpose of functionally assigning costs?**

19 A. Functional assignment serves the following purposes: (1) it groups associated costs together  
20 to facilitate allocation on the basis of cost responsibility; (2) it provides a rational mechanism  
21 for grouping costs that do not appear to be related to major service functions; and (3) it  
22 provides a mechanism for separating assignable costs from joint costs, which must be  
23 allocated.



1 **Q. What functional groups were used in the natural gas cost of service study?**

2 A. The following standard functional groups were identified in the cost of service study: (1)  
3 Storage, (2) Transmission, (3) Distribution Commodity, (4) Distribution Structures and  
4 Equipment, (5) Distribution Mains, (6) Services, (7) Meters, (8) Customer Accounts, and (9)  
5 Customer Service Expense.

6 **Q. How were costs classified as commodity related, demand related or customer related?**

7 A. Classification provides a method of arranging costs so that the service characteristics which  
8 give rise to the costs can serve as a basis for allocation. Costs classified as *commodity related*  
9 tend to vary with the quantity of gas delivered, such as gas supply and the operation of  
10 compressors. Since gas supply costs were removed from the cost of service study, it was not  
11 necessary to classify gas supply costs. Costs classified as *demand related* are costs related to  
12 facilities installed to meet design-day usage requirements. Costs classified as *customer*  
13 *related* include costs incurred to serve customers regardless of the quantity of gas purchased  
14 or the peak requirements of the customers. All transmission plant costs were classified as  
15 demand related. Distribution Structures and Equipment costs were classified as demand-  
16 related. Costs related to Distribution Mains were classified as demand-related and customer-  
17 related using the zero-intercept methodology. Services, Meters, Customer Accounts, and  
18 Customer Service Expenses were all classified as customer-related.

19 **Q. Have you prepared an exhibit showing the results of the functional assignment and**  
20 **classification steps of the cost of service study?**

21 A. Yes. Seelye Exhibit 5 shows the results of the first two steps of the cost of service study:  
22 functional assignment and classification.

1 **Q. In your cost of service model, once costs are functionally assigned and classified, how**  
2 **are these costs allocated to the customer classes?**

3 A. In the cost of service model used in this study, Delta's accounting costs are functionally  
4 assigned and classified using what are referred to in the model as "functional vectors." These  
5 vectors are multiplied (using *scalar multiplication*) by the various accounts in order to  
6 simultaneously assign costs to the functional groups and classify costs. Therefore, in the  
7 portion of the model included in Seelye Exhibit 5, Delta's accounting costs are functionally  
8 assigned and classified using the explicitly determined functional vectors of the analysis and  
9 using internally generated functional vectors. The explicitly determined functional vectors,  
10 which are primarily used to direct where costs are functionally assigned and classified, are  
11 shown on pages 27 and 28 of Seelye Exhibit 5. Internally generated functional vectors are  
12 utilized throughout the study to functionally assign costs on the basis of similar costs or on  
13 the basis of internal cost drivers. The internally generated functional vectors are shown on  
14 pages 29 and 30 of Seelye Exhibit 5. The functional vector used to allocate a specific cost is  
15 identified by the column in the model labeled "Vector" and refers to a vector identified  
16 elsewhere in the analysis by the column labeled "Name."

17 Once costs for all of the major accounts are functionally assigned and classified, the  
18 resultant cost matrix for the major cost groupings (e.g., Plant in Service, Rate Base,  
19 Operation and Maintenance Expenses) is then transposed and allocated to the customer  
20 classes using "allocation vectors" or "allocation factors." The results of the class allocation  
21 step of the cost of service study are included in Seelye Exhibit 6. The costs shown in the  
22 column labeled "Total System" in Seelye Exhibit 6 were carried forward *from* the

1 functionally assigned and classified costs shown in Seelye Exhibit 5. The column labeled  
2 “Ref” in Seelye Exhibit 6 provides a reference to the results included in Seelye Exhibit 5.

3 **Q. Please describe the allocation factors used in the gas cost of service study.**

4 A. The following allocation factors were used in the gas cost of service study herein:

- 5 • **DEM02** is used to allocate Storage demand-related costs and  
6 represents a composite allocation based on expected winter season  
7 requirements and design day demands. The class allocation factor is  
8 the sum of (a) the volumes (commodity) withdrawn from storage  
9 during the expected winter season, and (b) the volumes needed in  
10 storage to meet the design-day demands. The calculation of this  
11 allocation factor is shown on Seelye Exhibit 7.
- 12 • **DEM03** is used to allocate Transmission demand-related costs and is  
13 allocated on the basis of design-day demands determined at Delta’s -3  
14 degree F design-day mean temperature.
- 15 • **DEM04** is used to allocate Distribution Structures and Equipment  
16 demand-related costs and represents maximum class demands  
17 determined at Delta’s -3 degree F design day mean temperature.  
18 These demands were calculated using base loads and temperature  
19 sensitive loads developed for the temperature normalization  
20 adjustment. The temperature normalization adjustment will be  
21 discussed later in my testimony.
- 22 • **DEM05** is used to allocate the demand-related portion of the cost of  
23 distribution mains and represents maximum class demands



1 determined at the design day mean temperature.

- 2 • **COM02** is used to allocate Storage commodity-related costs and  
3 represents actual customer class deliveries during the winter  
4 withdrawal season (defined as the months of December through  
5 March.)
- 6 • **COM03** is used to allocate Transmission commodity-related costs  
7 and represents annual throughput volumes (including both sales and  
8 transportation).
- 9 • **COM04** is used to allocate Distribution commodity-related costs and  
10 represents annual throughput volumes (including both sales and  
11 transportation) of customers served on the distribution system.
- 12 • **CUST01** is used to allocate the customer-related portion of Delta's  
13 distribution mains and represents the year-end number of customers.
- 14 • **CUST02** is used to allocate Services and is based on the total  
15 estimated cost of installing a service line per customer in each  
16 customer class weighted by the year-end number of customers in each  
17 class.
- 18 • **CUST03** is used to allocate Meters and is based on the estimated cost  
19 of meters and meter installation costs per customer in each customer  
20 class weighted by the year-end number of customers in each class.
- 21 • **CUST04** is used to allocate customer accounts expenses (Accounts  
22 901 through 905) and is determined on the basis of the average  
23 number of customers.

- 1           •       **CUST05** is used to allocate customer service expenses using the  
2                    same allocation factor used to allocate Accounts 901, 902, 903, and  
3                    905 in CUST04.

4   **Q.    How are mains typically classified between demand and customer costs?**

5   A.    Two commonly used methodologies for determining demand/customer splits of distribution  
6           plant are the “minimum system” methodology and the “zero-intercept” methodology. In the  
7           minimum system approach, a “minimum” standard pipe size is selected and the minimum  
8           system is obtained by pricing all of the distribution mains at the unit cost of this minimum  
9           size pipe. The minimum system determined in this manner is then classified as customer-  
10          related and allocated on the basis of the number of customers in each rate class. All costs in  
11          excess of the minimum system are classified as demand-related. The theory supporting this  
12          approach maintains that in order for a utility to serve even the smallest customer, it would  
13          have to install a minimum size system. Therefore, the costs associated with the minimum  
14          system are related to the number of customers that are served, instead of the demand imposed  
15          by the customers on the system.

16                In preparing this study, the zero-intercept methodology, rather than the minimum  
17                system methodology, was used to determine the customer component of mains. Because the  
18                zero-intercept methodology is less subjective than the minimum system approach, the zero-  
19                intercept methodology is strongly preferred over the minimum system methodology when the  
20                necessary data is available. With the zero-intercept methodology, we are not forced to  
21                choose a minimum size main to determine the customer component. In the zero-intercept  
22                methodology, a zero-diameter pipe is the absolute minimum system.

1 **Q. What is the theory behind the zero-intercept methodology?**

2 A. The theory behind the zero-intercept methodology is that there is a linear relationship  
3 between the unit cost (\$/ft) of mains and the gas flow capability of the pipe, which is  
4 proportionate to its diameter. After establishing a linear relation, which is given by the  
5 equation:

6 
$$y = a + bx$$

7 where:

8  $y$  is the unit cost of the pipe,

9  $x$  is the size of the pipe, and

10  $a, b$  are the coefficients representing the intercept and slope, respectively

11 it can be determined that, theoretically, the unit cost of a pipe with zero diameter (or pipe  
12 with zero load carrying capability) is  $a$ , the zero intercept. The zero intercept is essentially  
13 the cost component of mains that is invariant to the size (and load carrying capability) of the  
14 pipe.

15 Like most gas distribution systems, the number of feet of mains on Delta's system is  
16 not uniformly distributed over all sizes of pipe. For example, Delta has over 4.6 million feet  
17 of 2-inch plastic mains, but only 89 thousand feet of 3-inch plastic mains. For this reason, it  
18 was necessary to use a weighted regression analysis, instead of a standard least-squares  
19 analysis, in the determination of the zero intercept. Using a weighted regression analysis, the  
20 cost and diameter of each size pipe is, in effect, weighted by the number of feet of installed  
21 pipe. In a weighted regression analysis, the following weighted sum of squared differences



$$\sum_i w_i (y_i - \hat{y}_i)^2$$

1  
2 is minimized, where  $w$  is the weighting factor (in this case the feet of pipe) for each size of  
3 pipe, and  $y$  is the observed value and  $\hat{y}$  is the predicted value of the dependent variable (in  
4 this case the unit cost of the pipe).

5 Attached as Seelye Exhibit 8 is the zero-intercept analysis used in this study. The  
6 zero-intercept unit cost of \$5.65 per foot pipe is applied to the total feet of mains in the  
7 analysis to determine the customer cost component. The listing on page 1 of the analysis  
8 indicates that the coefficient of determination R-squared for mains is 0.9475. The coefficient  
9 of determination is a relative measure of the closeness of fit, where a coefficient of 0.0  
10 indicates no linear correlation between the independent variable and dependent variable and a  
11 coefficient of 1.0 indicates perfect linear correlation.

12 **Q. Has the Commission accepted the use of the zero-intercept methodology in previous**  
13 **cases?**

14 A. Yes, on many occasions. The Commission accepted the methodology utilized by Delta in  
15 Case No. 2004-00067. LG&E utilized the zero-intercept methodology in the cost of service  
16 studies submitted in several rate cases (Case Nos. 2000-080 and 90-158) in which the  
17 Commission has issued orders and the Commission found them to be reasonable. LG&E  
18 utilized the same methodology in Case Nos. 2003-00433, 2008-00252 and 2009-00549.  
19 The Commission also found the embedded cost of service study submitted by The Union  
20 Light Heat and Power in its gas base rate case (Case No. 2001-00092), which utilized a zero-

1 intercept methodology, to be reasonable. In my experience, the zero-intercept methodology  
2 is the predominant method used in Kentucky and is used widely in other jurisdictions.

3 **Q. Please summarize the results of the gas cost of service study.**

4 A. The following table (Table 2) summarizes the rates of return on net cost rate base for each  
5 customer class before and after reflecting the rate adjustments proposed by Delta. The  
6 Actual Adjusted Rate of Return was calculated by dividing the adjusted net operating income  
7 by the adjusted net cost rate base for each customer class. The Proposed Rate of Return was  
8 calculated by dividing the net operating income adjusted for the proposed rate increase by the  
9 adjusted net cost rate base.

10

<b>Customer Class</b>	<b>Actual Adjusted Rate of Return</b>	<b>Proposed Rate of Return</b>
Residential	3.44%	8.19%
Small Non-Residential	5.51%	9.21%
Large Non-Residential	7.00%	10.64%
Interruptible	15.08%	15.08%
Special Contracts	0.79%	0.79%
Off-System Transportation	5.59%	7.26%
Total System	4.79%	8.66%

11

12 **Q. Is the current actual rate of return for the residential class adequate?**

13 A. No. As shown in Table 1, the actual adjusted rate of return for the residential class is below  
14 the rates of return for the other customer classes. Delta's overall adjusted rate of return is  
15 4.79%, while the rate of return for the residential class is only 3.44%. In my opinion, Delta  
16 should be allowed to charge rates that bring the residential rate of return more in line with the  
17 overall rate of return.

1 **Q. Would Delta’s proposed rates move the company toward bringing the class rates of**  
2 **return closer together?**

3 A. Yes. As Table 1 shows, the residential rates proposed by Delta result in a pro-forma rate of  
4 return of 8.19%, which brings the residential class within 47 basis points of the proposed  
5 overall rate of return of 8.66%. This is an improvement over the 1.35 percentage point  
6 difference between the current overall and residential rates of return of 4.79% and 3.44%,  
7 respectively.

8  
9 **IV. TEMPERATURE NORMALIZATION ADJUSTMENT**

10 **Q. Please explain the calculations and methodology used to determine the temperature**  
11 **normalization adjustment to test period revenue.**

12 A. Delta has a Weather Normalization Adjustment (“WNA”) clause that automatically adjusts  
13 the commodity charge to reflect normal temperatures. The WNA clause is applicable to  
14 residential and small non-residential customers and is currently applied during the months of  
15 December through April. Because the WNA automatically normalizes customer billings for  
16 these two rate classes during the months of December through April it is not necessary to  
17 perform a temperature normalization adjustment for these two classes during these months.  
18 However, it is necessary to perform a temperature normalization adjustment for the  
19 residential and small non-residential customer classes to reflect the heating months not  
20 covered by the WNA. Additionally, it is necessary to perform a temperature normalization  
21 adjustment for rate classes not billed under the WNA, namely, large non-residential and  
22 interruptible rate classes.



1 **Q. How was the gas temperature normalization adjustment performed for the rate classes**  
2 **not billed under the WNA?**

3 A. A standard temperature normalization adjustment covering the entire heating season was  
4 performed for the large non-residential and interruptible rate classes. Heating degree days  
5 related to cycle billed customer deliveries were 11 below the 30-year average Weather  
6 Bureau heating-degree days of 4,603 where the 30-year average was determined using the  
7 period ended December 31,2009. Thus, Delta's actual revenues for these rate classes were  
8 mildly understated due to slightly warmer than normal temperatures experienced during the  
9 test period. The degree-day data used for purposes of calculating the temperature  
10 normalization adjustment was obtained from the Lexington, Kentucky weather station.

11 The first step in computing the temperature-related variance in deliveries was to  
12 determine the annual non-temperature sensitive and temperature sensitive volumes for each  
13 rate class. The determination of the non-temperature sensitive volumes was based on the gas  
14 deliveries that occurred in July and August since those months had no heating degree days.  
15 The volumes in those two months were then multiplied by six to calculate an annual non-  
16 temperature sensitive load that was deducted from total deliveries to arrive at the annual  
17 temperature sensitive volumes.

18 The next step was to determine the volumetric adjustment required to normalize  
19 deliveries to reflect normal temperatures. The annual temperature sensitive volumes were  
20 divided by the actual heating degree days (4,592 for billing cycle customers) in the test  
21 period and the resulting Mcf per degree day was then multiplied by the degree-day departure  
22 from normal (11 HDDs) to arrive at the volumetric adjustment for each rate class. In the

1 final step, the volumetric adjustment for each rate class was applied to the applicable  
2 distribution component (rate per Mcf) for each rate schedule not billed under the WNA.

3 **Q. How was the gas temperature normalization adjustment performed for the residential  
4 and small non-residential rate classes, which are billed under the WNA?**

5 A. The same methodology was used for the residential and small non-residential rate classes  
6 except that the difference in degree days was determined only for the months outside of the  
7 period when the WNA is applied. In other words the temperature normalization was only  
8 applied to the 7 non-WNA months of May through November. Since the WNA adjusts  
9 customer volumes during the months of December through April, it was not necessary to make  
10 a temperature normalization adjustment during these months. During the months of May  
11 through November, actual heating degree days related to cycle billed customer deliveries were  
12 68 above the 30-year average Weather Bureau heating-degree days of 795 for those months.  
13 This difference was then used in the calculation of the temperature normalization adjustment  
14 for the residential and small non-residential rate classes.

15 **Q. Please summarize the total impact of the gas temperature normalization adjustment.**

16 A. The temperature normalization adjustment results in a net decrease of \$63,111 to Delta's gas  
17 operating revenue. The calculation of this amount is summarized on Seelye Exhibit 9. The  
18 amount is also reflected by rate class and in total in Column 5 of Seelye Exhibit 3.

19

1 **V. REVENUE ADJUSTMENT TO REFLECT YEAR-END CUSTOMERS**

2 **Q. Is Delta proposing to make a pro-forma adjustment to reflect the number of customers**  
3 **served at the end of the year?**

4 A. No. Delta respectfully requests that a year-end customer adjustment not be made in this  
5 proceeding. The purpose of such an adjustment is to normalize annual revenues to reflect a  
6 going forward level of customers. The rationale for a year-end adjustment is to compare the  
7 number of customers at the end of the test year to the average number of customers during the  
8 test year. If the year-end level is higher than the average then it is assumed that the Company is  
9 adding customers and that the year-end level of customers and associated revenues is more  
10 appropriate than the average test-year level on a going-forward basis for purposes of setting  
11 rates. Delta does not believe that the year-end level of customers reflects an appropriate going  
12 forward level of customers. In fact, it is likely that the revenues associated with the year-end  
13 level will overstate Delta's going forward revenue because the year-end level of customers will  
14 almost certainly be higher than the average number of customers during the first full year that  
15 the rates go into effect.

16 In this proceeding, the year-end level of customers is higher than the average, but not  
17 because of customer growth; instead, it is because of the selection of the 12 months ended  
18 December as the test year. A significant number of customers disconnect service during the  
19 summer months and return to the system during the winter months. Because the test year in  
20 this proceeding ends in December – which is a winter month – using the year-end level of  
21 customers overstates the customer level that should be used for purposes of normalization. On  
22 the whole, Delta is not adding customers. In fact, Delta has been consistently losing customers  
23 over the past several years. In 2002, Delta's total average customer count was 40,185. By



1 2006, that number had declined to 38,117 and in the 2009 test year that number is 35,895.  
2 Based on this trend, one could expect that the number of customers served by Delta will  
3 continue to decrease, thus suggesting that a downward adjustment could be made to normalize  
4 revenues to reflect the number of customers served on a going forward basis. Delta is not  
5 proposing to make a downward revenue adjustment to reflect this trend, and requests that the  
6 Commission not make a year-end adjustment in this proceeding. The standard year-end  
7 adjustment is included in Seelye Exhibit 10 in the event that the Commission rejects the  
8 recommendation not to make a year-end adjustment.  
9

10 **VI. DEPRECIATION STUDY AND DEPRECIATION EXPENSE ADJUSTMENT**

11 **Q. Did you supervise the preparation of a depreciation study for Delta?**

12 A. Yes.

13 **Q. Was a standard methodology used to determine the depreciation accrual rates?**

14 A. Yes. Where suitable information was available, the Simulated Plant Record (SPR)  
15 methodology was used to determine the survivor curve that best fit the plant retirement data for  
16 Delta's plant accounts. The SPR methodology is described in *Public Utility Depreciation*  
17 *Practices* published by the National Association of Regulatory Utility Commissioners and in  
18 other publications. Where sufficient data were not available, or the resulting statistics were not  
19 satisfactory, we relied heavily on comparisons to the survivor curves and depreciation rates  
20 utilized by neighboring gas utilities. The methodology used to develop the depreciation accrual  
21 rates is described in more detail in the report included in Seelye Exhibit 11.

1 Q. Was the same methodology used in this depreciation study as in study filed by Delta in  
2 its last two rate cases (Case Nos. 2004-00067 and 2007-00089)?

3 A. Yes.

4 Q. Does this conclude your testimony?

5 A. Yes, it does.





# **Seelye Exhibit 1**

Summary of Qualifications

William Steven Seelye

## QUALIFICATIONS OF WILLIAM STEVEN SEELYE

### Summary of Qualifications

Provides consulting services to numerous investor-owned utilities, rural electric cooperatives, and municipal utilities regarding utility rate and regulatory filings, cost of service and wholesale and retail rate designs; and develops revenue requirements for utilities in general rate cases, including the preparation of analyses supporting pro-forma adjustments and the development of rate base.

### Employment

*Senior Consultant and Principal*  
The Prime Group, LLC  
(July 1996 to Present)

Provides consulting services in the areas of tariff development, regulatory analysis revenue requirements, cost of service, rate design, fuel and power procurement, depreciation studies, lead-lag studies, and mathematical modeling.

Assists utilities with developing strategic marketing plans and implementation of those plans. Provides utility clients assistance regarding regulatory policy and strategy; project management support for utilities involved in complex regulatory proceedings; process audits; state and federal regulatory filing development; cost of service development and support; the development of innovative rates to achieve strategic objectives; unbundling of rates and the development of menus of rate alternatives for use with customers; performance-based rate development.

Prepared retail and wholesale rate schedules and filings submitted to the Federal Energy Regulatory Commission (FERC) and state regulatory commissions for numerous of electric and gas utilities. Performed cost of service or rate studies for over 150 utilities throughout North America. Prepared market power analyses in support of market-based rate filings submitted to the FERC for utilities and their marketing affiliates. Performed business practice audits for electric utilities, gas utilities, and independent transmission organizations (ISOs), including audits of production cost modeling, retail utility tariffs, retail utility

billing practices, and ISO billing processes and procedures.

*Manager of Rates and Other Positions*  
Louisville Gas & Electric Co.  
(May 1979 to July 1996)

Held various positions in the Rate Department of LG&E. In December 1990, promoted to Manager of Rates and Regulatory Analysis. In May 1994, given additional responsibilities in the marketing area and promoted to Manager of Market Management and Rates.

### **Education**

Bachelor of Science Degree in Mathematics, University of Louisville, 1979  
54 Hours of Graduate Level Course Work in Industrial Engineering and Physics.

### **Associations**

Member of the Society for Industrial and Applied Mathematics

### **Expert Witness Testimony**

Alabama: Testified in Docket 28101 on behalf of Mobile Gas Service Corporation concerning rate design and pro-forma revenue adjustments.

Colorado: Testified in Consolidated Docket Nos. 01F-530E and 01A-531E on behalf of Intermountain Rural Electric Association in a territory dispute case.

FERC: Submitted direct and rebuttal testimony in Docket No. EL02-25-000 et al. concerning Public Service of Colorado's fuel cost adjustment.

Submitted direct and responsive testimony in Docket No. ER05-522-001 concerning a rate filing by Bluegrass Generation Company, LLC to charge reactive power service to LG&E Energy, LLC.

Submitted testimony in Docket Nos. ER07-1383-000 and ER08-05-000 concerning Duke Energy Shared Services, Inc.'s charges for reactive power service.

Submitted testimony in Docket No. ER08-1468-000 concerning changes to Vectren Energy's transmission formula rate.

Submitted testimony in Docket No. ER08-1588-000 concerning a generation formula rate for Kentucky Utilities Company.



Submitted testimony in Docket No. ER09-180-000 concerning changes to Vectren Energy's transmission formula rate.

- Florida: Testified in Docket No. 981827 on behalf of Lee County Electric Cooperative, Inc. concerning Seminole Electric Cooperative Inc.'s wholesale rates and cost of service.
- Illinois: Submitted direct, rebuttal, and surrebuttal testimony in Docket No. 01-0637 on behalf of Central Illinois Light Company ("CILCO") concerning the modification of interim supply service and the implementation of black start service in connection with providing unbundled electric service.
- Indiana: Submitted direct testimony and testimony in support of a settlement agreement in Cause No. 42713 on behalf of Richmond Power & Light regarding revenue requirements, class cost of service studies, fuel adjustment clause and rate design.
- Submitted direct and rebuttal testimony in Cause No. 43111 on behalf of Vectren Energy in support of a transmission cost recovery adjustment.
- Submitted direct testimony in Cause No. 43773 on behalf of Crawfordsville Electric Light & Power regarding revenue requirements, class cost of service studies, fuel adjustment clause and rate design.
- Kansas: Submitted direct and rebuttal testimony in Docket No. 05-WSEE-981-RTS on behalf of Westar Energy, Inc. and Kansas Gas and Electric Company regarding transmission delivery revenue requirements, energy cost adjustment clauses, fuel normalization, and class cost of service studies.
- Kentucky: Testified in Administrative Case No. 244 regarding rates for cogenerators and small power producers, Case No. 8924 regarding marginal cost of service, and in numerous 6-month and 2-year fuel adjustment clause proceedings.
- Submitted direct and rebuttal testimony in Case No. 96-161 and Case No. 96-362 regarding Prestonsburg Utilities' rates.
- Submitted direct and rebuttal testimony in Case No. 99-046 on behalf of Delta Natural Gas Company, Inc. concerning its rate stabilization plan.
- Submitted direct and rebuttal testimony in Case No. 99-176 on behalf of Delta Natural Gas Company, Inc. concerning cost of service, rate design and expense adjustments in connection with Delta's rate case.

Submitted direct and rebuttal testimony in Case No. 2000-080, testified on behalf of Louisville Gas and Electric Company concerning cost of service, rate design, and pro-forma adjustments to revenues and expenses.

Submitted rebuttal testimony in Case No. 2000-548 on behalf of Louisville Gas and Electric Company regarding the company's prepaid metering program.

Testified on behalf of Louisville Gas and Electric Company in Case No. 2002-00430 and on behalf of Kentucky Utilities Company in Case No. 2002-00429 regarding the calculation of merger savings.

Submitted direct and rebuttal testimony in Case No. 2003-00433 on behalf of Louisville Gas and Electric Company and in Case No. 2003-00434 on behalf of Kentucky Utilities Company regarding pro-forma revenue, expense and plant adjustments, class cost of service studies, and rate design.

Submitted direct and rebuttal testimony in Case No. 2004-00067 on behalf of Delta Natural Gas Company regarding pro-forma adjustments, depreciation rates, class cost of service studies, and rate design.

Testified on behalf of Kentucky Utilities Company in Case No. 2006-00129 and on behalf of Louisville Gas and electric Company in Case No. 2006-00130 concerning methodologies for recovering environmental costs through base electric rates.

Testified on behalf of Delta Natural Gas Company in Case No. 2007-00089 concerning cost of service, temperature normalization, year-end normalization, depreciation expenses, allocation of the rate increase, and rate design.

Submitted testimony on behalf of Big Rivers Electric Corporation and E.ON U.S. LLC in Case No 2007-00455 and Case No. 2007-00460 regarding the design and implementation of a Fuel Adjustment Clause, Environmental Surcharge, Unwind Surcredit, Rebate Adjustment, and Member Rate Stability Mechanism for Big Rivers Electric Corporation in connection with the unwind of a lease and purchase power transaction with E.ON U.S. LLC.

Submitted testimony in Case No. 2008-00251 on behalf of Kentucky Utilities Company and in Case No. 2008-00252 on behalf of Louisville Gas and Electric Company regarding pro-forma revenue and expense adjustments, electric and gas temperature normalization, jurisdictional separation, class cost of service studies, and rate design.

Submitted testimony in Case No. 2008-00409 on behalf of East Kentucky Power Cooperative, Inc., concerning revenue requirements, pro-forma adjustments, cost of service, and rate design.



Submitted testimony in Case No. 2009-00040 on behalf of Big Rivers Electric Corporation regarding revenue requirements and rate design.

Submitted testimony on behalf of Columbia Gas Company of Kentucky in Case No. 2009-00141 regarding the demand side management program costs and cost recovery mechanism.

Submitted testimony in Case No. 2009-00548 on behalf of Kentucky Utilities Company and in Case No. 2009-00549 on behalf of Louisville Gas and Electric Company regarding pro-forma revenue and expense adjustments, electric and gas temperature normalization, jurisdictional separation, class cost of service studies, and rate design.

Nevada: Submitted direct and rebuttal testimony in Case No. 03-10001 on behalf of Nevada Power Company regarding cash working capital and rate base adjustments.

Submitted direct and rebuttal testimony in Case No. 03-12002 on behalf of Sierra Pacific Power Company regarding cash working capital.

Submitted direct and rebuttal testimony in Case No. 05-10003 on behalf of Nevada Power Company regarding cash working capital for an electric general rate case.

Submitted direct and rebuttal testimony in Case No. 05-10005 on behalf of Sierra Pacific Power Company regarding cash working capital for a gas general rate case.

Submitted direct and rebuttal testimony in Case Nos. 06-11022 and 06-11023 on behalf of Nevada Power Company regarding cash working capital for a gas general rate case.

Submitted direct and rebuttal testimony in Case No. 07-12001 on behalf of Sierra Pacific Power Company regarding cash working capital for an electric general rate case.

Submitted direct testimony in Case No. Docket No. 08-12002 on behalf of Nevada Power Company regarding cash working capital for an electric general rate case.

Nova Scotia: Testified on behalf of Nova Scotia Power Company in NSUARB – NSPI – P-887 regarding the development and implementation of a fuel adjustment mechanism.



Submitted testimony in NSUARB – NSPI – P-884 regarding Nova Scotia Power Company’s application to approve a demand-side management plan and cost recovery mechanism.

Submitted testimony in NSUARB – NSPI – P-888 regarding a general rate application filed by Nova Scotia Power Company.

Submitted testimony on behalf of Nova Scotia Power Company in the matter of the approval of backup, top-up and spill service for use in the Wholesale Open Access Market in Nova Scotia.

Submitted testimony in NSUARB – NSPI – P-884 (2) on behalf of Nova Scotia Power Company’s regarding a demand-side management cost recovery mechanism.

Virginia: Submitted testimony in Case No. PUE-2008-00076 on behalf of Northern Neck Electric Cooperative regarding revenue requirements, class cost of service, jurisdictional separation and an excess facilities charge rider.

Submitted testimony in Case No. PUE-2009-00029 on behalf of Old Dominion Power Company regarding class cost of service, jurisdictional separation, allocation of the revenue increase, general rate design, time of use rates, and excess facilities charge rider.

Submitted testimony in Case No. PUE-2009-00065 on behalf of Craig-Botetourt Electric Cooperative regarding revenue requirements, class cost of service, jurisdictional separation and an excess facilities charge rider.



## **Seelye Exhibit 2**

### Reconstruction of Billing Determinants



**Delta Natural Gas Company, Inc.**  
 Calculations to Verify Test Period Billing Determinants  
 For the 12 months Ended December 31, 2009

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	Actual Billed Revenue	Elimination of Gas Cost Adjustment (See Gas Cost Exhibit)	Billing Correction	Revenue Excluding Gas Cost Adjustment (Column (1) + (2))	Elimination of Weather Normalization Adjustment (See WNA Exhibit)	Net Revenue (Column (3) + (4))	Calculated Net Revenue (See Verification of Rates Exhibit)	Correction Factor (Column (6) / Column (7))
<b>REVENUE</b>								
Residential \$	30,606,864.00	\$ (17,994,255.40)		\$ 12,612,608.60	\$ 71,470.00	\$ 12,684,078.60	\$ 12,487,172.45	0.98448
Small Non-Residential GS	9,073,688.00	(5,663,368.35)		3,410,319.65	15,561.00	3,425,880.65	3,384,458.10	0.98791
Large Non-Residential GS	11,908,202.00	(8,082,382.97)		3,825,819.03	-	3,825,819.03	3,821,227.48	0.99880
Large Non-Residential GS - Commercial	1,203,947.00	(895,797.11)		308,149.89	-	308,149.89	308,031.29	0.99962
Large Non-Residential GS - Industrial	13,112,149.00	(8,978,180.07)		4,133,968.93	-	4,133,968.93	4,129,258.77	
Total Large Non-Residential GS								
Interruptible								
Interruptible - Commercial	29,572.00	(24,285.70)		5,286.30	-	5,286.30	5,285.52	0.99985
Interruptible - Industrial	327,000.00	(275,248.31)		51,751.69	-	51,751.69	51,744.48	0.99986
Total Interruptible	356,572.00	(299,534.01)		57,037.99	-	57,037.99	57,030.00	
Unmetered Gas Lights								
Residential	5,249.00	(3,703.04)		1,545.96	-	1,545.96	1,546.78	1.00053
Commercial	3,766.00	(2,843.46)		1,122.54	-	1,122.54	1,024.65	0.91280
Small Commercial	5,274.00	(3,700.85)		1,573.15	-	1,573.15	1,434.51	0.91187
Unmetered Gas Lights	14,289.00	(10,047.35)		4,241.65	-	4,241.65	4,005.94	
<b>Total Retail</b>	<b>\$ 53,163,562.00</b>	<b>\$ (32,945,385.18)</b>		<b>\$ 20,218,176.82</b>	<b>\$ 87,031.00</b>	<b>\$ 20,305,207.82</b>	<b>\$ 20,061,925.26</b>	<b>0.98802</b>
Special Contracts	309,427.56			309,427.56		309,427.56	309,427.56	1.00000
Small Non-Residential GS	186,481.17			186,481.17		186,481.17	186,481.08	1.00001
Large Non-Residential GS	2,203,535.47			2,203,535.47		2,203,535.47	2,203,556.59	0.99999
Residential	8,471.17			8,471.17		8,471.17	8,471.12	0.99953
Interruptible	1,427,028.92			1,427,028.92		1,427,028.92	1,420,339.32	
Off System Transportation	4,134,944.29			4,134,944.29		4,134,944.29	4,128,275.67	0.97438
Off System Transportation	3,415,904.00			3,415,904.00		3,415,904.00	3,328,385.31	0.98753
<b>Total Transportation</b>	<b>\$ 7,550,848.29</b>			<b>\$ 7,550,848.29</b>		<b>\$ 7,550,848.29</b>	<b>\$ 7,456,660.98</b>	
<b>Miscellaneous Revenue</b>	<b>\$ 302,580.00</b>			<b>\$ 302,580.00</b>		<b>\$ 302,580.00</b>	<b>\$ 302,580.00</b>	<b>0.98802</b>
<b>Total Operating Revenue</b>	<b>\$ 61,016,990.29</b>	<b>\$ (32,945,385.18)</b>		<b>\$ 28,071,605.11</b>	<b>\$ 87,031.00</b>	<b>\$ 28,158,636.11</b>	<b>\$ 27,821,166.24</b>	
<b>MCF</b>			<b>9,040.00</b>					
Residential	1,650,148			1,650,148		1,650,148	1,650,148	
Small Non-Residential GS	515,460			515,460		515,460	515,460	
Large Non-Residential GS - Commercial	754,173			754,173		754,173	754,173	
Large Non-Residential GS - Industrial	81,222			81,222		81,222	81,222	
Interruptible - Commercial	2,210			2,210		2,210	2,210	
Interruptible - Industrial	25,265			25,265		25,265	25,265	
Unmetered Gas Lights - Total	1,020			1,020		1,020	1,020	
<b>Total Retail</b>	<b>3,029,498</b>			<b>3,029,498</b>		<b>3,029,498</b>	<b>3,029,498</b>	
On System Transportation Special	4,110,307			4,110,307		4,110,307	4,110,307	
Off System Transportation	10,642,929			10,642,929		10,642,929	10,642,929	
<b>Total Transportation</b>	<b>14,753,236</b>			<b>14,753,236</b>		<b>14,753,236</b>	<b>14,753,236</b>	
<b>Total</b>	<b>17,782,734</b>			<b>17,782,734</b>		<b>17,782,734</b>	<b>17,782,734</b>	



## **Seelye Exhibit 3**

### Summary of Proposed Increase



**Delta Natural Gas Company, Inc.**

Summary of Rate Increase by Rate Class  
Based on Adjusted Sales and Transportation for the 12 months Ended December 31, 2009

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	Actual Billed Revenue	Elimination of Gas Cost Adjustment	Correction	Net Revenue Before Temperature Adjustment	Temperature Adjustment	GCR at Current Rates	Adjusted Billings at Current Rates	Increase in Revenue
		( See Gas Cost Exhibit )		( Column (1) + (2) )	( See Temperature Normalization Exhibit )	6.0360	( Column (3) + (4) + (5) )	
<b>REVENUE</b>								
Residential \$	30,606,864	\$ (17,994,255)		\$ 12,612,609	\$ (57,963)	\$ 9,772,403	\$ 22,327,049	\$ 3,538,987
Small Non-Residential GS	9,073,688	(5,663,368)		3,410,320	(13,572)	3,069,026	6,465,774	593,145
Large Non-Residential GS	11,908,202	(8,082,383)		3,825,819	4,894	4,559,291	8,390,004	628,392
Large Non-Residential GS - Commercial	1,203,947	(895,797)		308,150	640	491,187	799,977	40,167
Large Non-Residential GS - Industrial	13,112,149	(8,978,180)		4,133,969	5,534	5,050,478	9,189,981	668,559
Total Large Non-Residential GS								
Interruptible	29,572	(24,286)		5,286	-	13,338	18,624	-
Interruptible - Commercial	327,000	(275,248)		51,752	53	152,699	204,503	-
Interruptible - Industrial	356,572	(299,534)		57,038	53	166,036	223,127	-
Total Interruptible								
Unmetered Gas Lights	5,249	(3,703)		1,546	-	2,245	3,791	65
Residential	3,766	(2,643)		1,123	-	1,630	2,752	159
Commercial	5,274	(3,701)		1,573	-	2,282	3,855	223
Small Commercial	14,289	(10,047)		4,242	-	6,157	10,398	448
Unmetered Gas Lights								
<b>Total Retail</b>	<b>\$ 53,163,562</b>	<b>\$ (32,945,385)</b>	<b>\$ -</b>	<b>\$ 20,218,177</b>	<b>\$ (65,947)</b>	<b>\$ 18,064,101</b>	<b>\$ 38,216,330</b>	<b>\$ 4,801,139</b>
Special Contracts	\$ 309,428	\$ -	\$ -	\$ 309,428	\$ -	\$ -	\$ 309,428	\$ -
Small Non-Residential GS	186,481	-	-	186,481	366	-	186,847	18,165
Large Non-Residential GS	2,203,535	-	-	2,203,535	2,470	-	2,206,005	241,036
Residential	8,471	-	-	8,471	-	-	8,471	2,058
Interruptible	1,427,029	-	-	1,427,029	-	-	1,427,029	-
On System Transportation	4,134,944	-	-	4,134,944	2,836	-	4,137,780	261,259
Off System Transportation	3,415,904	-	-	3,415,904	-	-	3,415,904	253,030
<b>Total Transportation</b>	<b>\$ 7,550,848</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 7,550,848</b>	<b>\$ 2,836</b>	<b>\$ -</b>	<b>\$ 7,553,684</b>	<b>\$ 514,289</b>
Miscellaneous Revenue	\$ 302,580	\$ -	\$ -	\$ 302,580	\$ -	\$ -	\$ 302,580	\$ -
Total Operating Revenue	\$ 61,016,990	\$ (32,945,385)	\$ -	\$ 28,071,605	\$ (63,111)	\$ 18,064,101	\$ 46,072,595	\$ 5,315,428



## **Seelye Exhibit 4**

Calculated Billings at  
Proposed Rates



## Delta Natural Gas Company, Inc.

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

### Residential

	Customers	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
Customer Charge	367,703	\$ 15.30	\$ 5,625,855.90	\$ 24.00	\$ 24.00	\$ 8,824,872.00
<b>Commodity Charge</b>						
All Mcf	1,650,148	\$ 4.1580	\$ 6,861,316.55	\$ 4.3344	\$ 0.4334	\$ 7,151,742.65
Calculated Billings at Base Rates			\$ 12,487,172.45			\$ 15,976,614.65
Correction Factor -(Calculated / Actual)		0.98448		0.98448		
Total After Application of Correction Factor			\$ 12,684,078.60			\$ 16,228,544.68
<b>Temperature Normalization</b>						
All Mcf	(31,129)	\$ 4.1580	(129,432.52)	\$ 4.3344	\$ 0.4334	(134,911.15)
Adjusted Billings at Base Rates	1,619,020		\$ 12,554,646.08			\$ 16,093,633.53
GCR at Current Rates	1,619,020	6.0360	9,772,403.08	6.0360	0.6036	9,772,403.08
<b>Total Adjusted Billings at Base Rates</b>			\$ 22,327,049.16			\$ 25,866,036.61
Increase in Revenue						\$ 3,538,987.45
						15.9%

**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**Small Non-Residential General Service**

	Customers	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
Customer Charge	49,647	\$ 25.00	\$ 1,241,175.00	\$ 35.00	\$ 35.00	\$ 1,737,645.00
Commodity Charge						
All Mcf	515,460	\$ 4.1580	\$ 2,143,283.10	\$ 4.3344	\$ 0.4334	\$ 2,234,004.07
Calculated Billings at Base Rates	515,460	0.98791	\$ 3,384,458.10	0.9879		\$ 3,971,649.07
Correction Factor -(Calculated / Actual)						
Total After Application of Correction Factor			\$ 3,425,880.65			\$ 4,020,258.28
Temperature Normalization						
First 200 Mcf	(7,006)	\$ 4.1580	(29,132.71)	\$ 4.3344	\$ 0.4334	(30,365.84)
Adjusted Billings at Base Rates	508,454		\$ 3,396,747.94			\$ 3,989,892.44
GCR at Current Rates	508,454	6.0360	\$ 3,069,026.39	6.0360	\$ 0.6036	\$ 3,069,026.39
Total Adjusted Billings at Base Rates			\$ 6,465,774.33			\$ 7,058,918.83
Increase in Revenue						\$ 593,144.50
						9.2%

### Delta Natural Gas Company, Inc.

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

#### Large Non-Residential General Service - Commercial

	Customers	Present Rate	Present Rates	Calculated Net Revenue@	Proposed Rate	Proposed Rate Per Ccf	Proposed Rates	Calculated Net Revenue@
Customer Charge	9,891	\$ 100.00	\$ 989,100.00		\$ 150.00	\$ 150.00	\$ 1,483,650.00	
<b>Commodity Charge</b>	<b>Mcf</b>	<b>Present Rate</b>						
First 200 Mcf	577,069	\$ 4.1580	2,399,450.82	\$ 4.3344	\$ 0.4334	\$ 2,501,014.88		
Next 800 Mcf	162,413	\$ 2.5091	407,510.46	\$ 2.6855	\$ 0.2686	436,241.32		
Next 4,000 Mcf	14,691	\$ 1.7130	25,166.20	\$ 1.8894	\$ 0.1889	27,751.87		
Next 5,000 Mcf	-	\$ 1.3130	-	\$ 1.4894	\$ 0.1489	-		
Over 10,000 Mcf	-	\$ 1.1130	-	\$ 1.2894	\$ 0.1289	-		
<b>Calculated Billings at Base Rates</b>	<b>754,173</b>		<b>\$ 3,821,227.48</b>			<b>\$ 4,448,658.07</b>		
Correction Factor -(Calculated / Actual)		0.9988		0.9988				
<b>Total After Application of Correction Factor</b>			<b>\$ 3,825,819.03</b>			<b>\$ 4,454,003.54</b>		
<b>Temperature Normalization</b>								
First 200 Mcf	1,177	\$ 4.1580	4,893.97	\$ 4.3344	\$ 0.4334	5,101.12		
<b>Adjusted Billings at Base Rates</b>	<b>Mcf</b>							
GCR at Current Rates	755,350	\$ 6.0360	3,830,713.00	\$ 6.0360	0.6036	4,459,104.66		
	755,350		4,559,291.39			4,559,291.39		
			<b>\$ 8,390,004.39</b>			<b>\$ 9,018,396.05</b>		
Increase in Revenue						\$ 628,391.66	7.5%	



## Delta Natural Gas Company, Inc.

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

### Large Non-Residential General Service - Industrial

	Customers	Present Rate	Present Rates	Calculated Net Revenue@	Proposed Rate	Proposed Rate Per Ccf	Proposed Rates	Calculated Net Revenue@
Customer Charge	516	\$ 100.00	\$	51,600.00	\$ 150.00	\$ 150.00	\$	77,400.00
<b>Commodity Charge</b>	<b>Mcf</b>	<b>Present Rate</b>						
First 200 Mcf	37,318	\$ 4.1580		155,167.83	\$ 4.3344	\$ 0.4334		161,735.78
Next 800 Mcf	32,729	\$ 2.5091		82,119.83	\$ 2.6855	\$ 0.2686		87,909.56
Next 4,000 Mcf	11,176	\$ 1.7130		19,143.63	\$ 1.8894	\$ 0.1889		21,110.52
Next 5,000 Mcf	-	\$ 1.3130		-	\$ 1.4894	\$ 0.1489		-
Over 10,000 Mcf	-	\$ 1.1130		-	\$ 1.2894	\$ 0.1289		-
<b>Calculated Billings at Base Rates</b>	<b>81,222</b>		\$	<b>308,031.29</b>			\$	<b>348,155.86</b>
Correction Factor -(Calculated / Actual)		0.99962	\$	308,149.89	0.99962		\$	348,289.91
<b>Total After Application of Correction Factor</b>			\$				\$	
<b>Temperature Normalization</b>								
First 200 Mcf	154	\$ 4.1580		640.33	\$ 4.3344	\$ 0.4334		667.44
<b>Adjusted Billings at Base Rates</b>	<b>81,376</b>		\$	<b>308,790.22</b>			\$	<b>348,957.35</b>
GCR at Current Rates	81,376	6.0360	\$	491,186.74	6.0360	0.6036	\$	491,186.74
<b>Increase in Revenue</b>			\$	<b>799,976.96</b>			\$	<b>840,144.09</b>
							\$	40,167.13
								5.0%

**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**Interruptible Service - Commercial**

	Customers	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
<b>Customer Charge</b>	7	\$ 250.00	\$ 1,750.00	\$ 250.00	\$ 250.00	\$ 1,750.00
<b>Commodity Charge</b>						
First 1,000 Mcf	2,210	\$ 1.6000	3,535.52	\$ 1.6000	\$ 0.1600	3,535.52
Next 4,000 Mcf	-	\$ 1.2000	-	\$ 1.2000	\$ 0.1200	-
Next 5,000 Mcf	-	\$ 0.8000	-	\$ 0.8000	\$ 0.0800	-
Over 10,000 Mcf	-	\$ 0.6000	-	\$ 0.6000	\$ 0.0600	-
<b>Calculated Billings at Base Rates</b>	2,210		\$ 5,285.52			\$ 5,285.52
Correction Factor -(Calculated / Actual)		0.99985		0.99985		
<b>Total After Application of Correction Factor</b>			\$ 5,286.30			\$ 5,286.30
<b>Temperature Normalization</b>						
First 1,000 Mcf	0	\$ 1.6000	-	\$ 1.6000	\$ 0.1600	-
Adjusted Billings at Base Rates	2,210		\$ 5,286.30			\$ 5,286.30
GCR at Current Rates	2,210	6.0360	13,337.75	6.0360	0.6036	13,337.75
			\$ 18,624.05			\$ 18,624.05
Increase in Revenue						\$ 0.0%

**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**Interruptible Service - Industrial**

	Customers	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
Customer Charge	55	\$ 250.00	\$ 13,750.00	\$ 250.00	\$ 250.00	\$ 13,750.00
<b>Commodity Charge</b>	<b>Mcf Present Rate</b>					
First 1,000 Mcf	19,191	\$ 1.6000	30,705.92	\$ 1.6000	\$ 0.1600	30,705.92
Next 4,000 Mcf	6,074	\$ 1.2000	7,288.56	\$ 1.2000	\$ 0.1200	7,288.56
Next 5,000 Mcf	-	\$ 0.8000	-	\$ 0.8000	\$ 0.0800	-
Over 10,000 Mcf	-	\$ 0.6000	-	\$ 0.6000	\$ 0.0600	-
<b>Calculated Billings at Base Rates</b>	25,265		\$ 51,744.48			\$ 51,744.48
Correction Factor -(Calculated / Actual)		0.99986		0.99986		
<b>Total After Application of Correction Factor</b>			\$ 51,751.69			\$ 51,751.69
<b>Temperature Normalization</b>						
First 1,000 Mcf	33	\$ 1.6000	52.80	\$ 1.6000	\$ 0.1600	52.80
<b>Adjusted Billings at Base Rates</b>	25,298		\$ 51,804.49			\$ 51,804.49
GCR at Current Rates	25,298	6.0360	152,698.73	6.0360	0.6036	152,698.73
			\$ 204,503.22			\$ 204,503.22
Increase in Revenue						\$ -
						0.0%



**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**Unmetered Gas Lights - Residential**

	Lights	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
Customer Charge	248	\$ -	\$ -	\$ -	\$ -	\$ -
Commodity Charge All Mcf	372	\$ 4.1580	\$ 1,546.78	\$ 4.3344	\$ 0.4334	\$ 1,612.25
Calculated Billings at Base Rates <i>Correction Factor -(Calculated / Actual)</i>		1.00053	\$ 1,546.78	1.00053		\$ 1,612.25
<b>Total After Application of Correction Factor</b>			\$ 1,545.96			\$ 1,611.40
Temperature Normalization	-		-	-		-
Adjusted Billings at Base Rates GCR at Current Rates	372	\$ 6.0360	\$ 2,245.39	6.0360	0.6036	\$ 2,245.39
Increase in Revenue			\$ 3,791.35			\$ 3,856.79
						\$ 65.44
						1.7%

**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**Unmetered Gas Lights - Commercial**

	Lights	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
Customer Charge	24	\$ -	\$ -	\$ -		\$ -
Commodity Charge All Mcf	Mcf 270	\$ 3.7950	\$ 1,024.65	\$ 4.3344	\$ 0.4334	\$ 1,170.18
Calculated Billings at Base Rates		0.91280	\$ 1,024.65	0.91280		\$ 1,170.18
Correction Factor -(Calculated / Actual)			\$ 1,122.54			\$ 1,281.97
<b>Total After Application of Correction Factor</b>						
Temperature Normalization	-		\$ -	\$ -		\$ -
Adjusted Billings at Base Rates	Mcf 270		\$ 1,122.54			\$ 1,281.97
GCR at Current Rates	270	6.0360	\$ 1,629.72	6.0360	0.6036	\$ 2,911.69
Increase in Revenue			\$ 2,752.26			\$ 159.43
						5.8%

**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**Unmetered Gas Lights - Small Commercial**

	<b>Lights</b>	<b>Present Rate</b>	<b>Calculated Net Revenue@ Present Rates</b>	<b>Proposed Rate</b>	<b>Proposed Rate Per Ccf</b>	<b>Calculated Net Revenue@ Proposed Rates</b>
<b>Customer Charge</b>	36	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Commodity Charge</b>						
All Mcf	378	\$ 3.7950	\$ 1,434.51	\$ 4.3344	\$ 0.4334	\$ 1,638.25
<b>Calculated Billings at Base Rates</b>			\$ 1,434.51			\$ 1,638.25
<b>Correction Factor -(Calculated / Actual)</b>		0.91187		0.91187		
<b>Total After Application of Correction Factor</b>			\$ 1,573.15			\$ 1,796.58
<b>Temperature Normalization</b>			\$ -			\$ -
<b>Adjusted Billings at Base Rates</b>			\$ 1,573.15			\$ 1,796.58
<b>GCR at Current Rates</b>		6.0360	\$ 2,281.61	6.0360	0.6036	\$ 2,281.61
			\$ 3,854.76			\$ 4,078.19
<b>Increase in Revenue</b>						\$ 223.43
						5.8%



**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
 Based on the adjusted sales for the 12 months Ended December 31, 2009

**On System Transportation**

**Special Contracts (4)**

	<b>Customers</b>	<b>Mcf</b>	<b>Net Margin@ Present Rates</b>	<b>Net Margin@ Proposed Rates</b>
	48	1,955,008		
<b>Calculated Billings at Base Rates</b>			\$ 309,427.56	\$ 309,427.56
<i>Correction Factor -(Calculated / Actual)</i>			1.00000	1.00000
<b>Total After Application of Correction Factor</b>			\$ 309,427.56	\$ 309,427.56

**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**On System Transportation  
Small Non Residential General Service -Transportation**

	Customers	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
Customer Charge	1,147	\$ 25.00	\$ 28,675.00	\$ 35.00	\$ 35.00	\$ 40,145.00
<b>Commodity Charge</b>	<b>Mcf Present Rate</b>					
First 200 Mcf	37,952	\$ 4.1580	157,806.08	\$ 4.3344	\$ 0.4334	164,485.70
Next 800 Mcf	-	\$ 2.5091	-	\$ 2.6855	\$ 0.2686	-
Next 4,000 Mcf	-	\$ 1.7130	-	\$ 1.8894	\$ 0.1889	-
Next 5,000 Mcf	-	\$ 1.3130	-	\$ 1.4894	\$ 0.1489	-
Over 10,000 Mcf	-	\$ 1.1130	-	\$ 1.2894	\$ 0.1289	-
<b>Calculated Billings at Base Rates</b>	<b>37,952</b>	<b>\$ 1.00000</b>	<b>\$ 186,481.08</b>	<b>1.00000</b>	<b>\$</b>	<b>\$ 204,630.70</b>
<b>Correction Factor -(Calculated / Actual)</b>						
<b>Total After Application of Correction Factor</b>			<b>\$ 186,481.17</b>			<b>\$ 204,630.80</b>
<b>Temperature Normalization</b>						
First 200 Mcf	88.00	\$ 4.1580	365.90	\$ 4.3344	\$ 0.4334	381.39
<b>Adjusted Billings at Base Rates</b>	<b>Mcf</b>					
	37,952		\$ 186,847.07			\$ 205,012.19
<b>Increase in Revenue</b>						\$ 18,165.12
						9.7%

## Delta Natural Gas Company, Inc.

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

### On System Transportation Large Non Residential General Service -Transportation

	Customers	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
Customer Charge	1,053	\$ 100.00	\$ 105,300.00	\$ 150.00	\$ 150.00	\$ 157,950.00
<b>Commodity Charge</b>	<b>Mcf Present Rate</b>					
First 200 Mcf	100,565	\$ 4.1580	418,150.52	\$ 4.3344	\$ 0.4334	435,850.01
Next 800 Mcf	212,444	\$ 2.5091	533,042.74	\$ 2.6855	\$ 0.2686	570,624.05
Next 4,000 Mcf	453,128	\$ 1.7130	776,207.41	\$ 1.8894	\$ 0.1889	855,957.85
Next 5,000 Mcf	170,468	\$ 1.3130	223,823.83	\$ 1.4894	\$ 0.1489	253,826.11
Over 10,000 Mcf	132,104	\$ 1.1130	147,032.09	\$ 1.2894	\$ 0.1289	170,282.44
<b>Calculated Billings at Base Rates</b>	<b>1,068,708</b>	<b>\$</b>	<b>2,203,556.59</b>	<b>1.00001</b>	<b>\$</b>	<b>2,444,490.46</b>
<i>Correction Factor -(Calculated / Actual)</i>		<i>1.00001</i>	<i>\$ 2,203,535.47</i>			<i>\$ 2,444,467.03</i>
<b>Total After Application of Correction Factor</b>						
<b>Temperature Normalization</b>						
First 200 Mcf	594	\$ 4.1580	2,469.85	\$ 4.3344	\$ 0.4334	2,574.40
Adjusted Billings at Base Rates	<b>Mcf</b> 1,068,708	<b>\$</b>	<b>2,206,005.32</b>			<b>\$ 2,447,041.43</b>
Increase in Revenue						<b>\$ 241,036.11</b> 10.9%

**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**On System Transportation  
Residential**

	Customers	Present Rate	Calculated Net Revenue@ Present Rates	Proposed Rate	Proposed Rate Per Ccf	Calculated Net Revenue@ Proposed Rates
Customer Charge	211	\$ 15.30	\$ 3,228.30	\$ 24.00	\$ 24.00	\$ 5,064.00
<b>Commodity Charge</b>						
All Mcf	1,261	\$ 4.1580	\$ 5,242.82	\$ 4.3344	\$ 0.4334	\$ 5,464.74
<b>Calculated Billings at Base Rates</b>						
Correction Factor -(Calculated / Actual)		\$ 0.99999	\$ 8,471.12	\$ 0.99999		\$ 10,528.74
<b>Total After Application of Correction Factor</b>		\$ 8,471.17		\$ 8,471.17		\$ 10,528.80
<b>Temperature Normalization</b>						
All Mcf		\$ 4.1580	\$ -	\$ 4.3344	\$ 0.4334	\$ -
Adjusted Billings at Base Rates	Mcf 1,261	\$ 8,471.17				\$ 10,528.80
Increase in Revenue						\$ 2,057.63 24.3%



**Delta Natural Gas Company, Inc.**

Calculated Increase in Revenue under Revision of Rates  
Based on the adjusted sales for the 12 months Ended December 31, 2009

**On System Transportation  
Interruptible Service - Transportation**

	Customers	Present Rate	Present Rates	Calculated Net Revenue@	Proposed Rate	Proposed Rate Per Ccf	Proposed Rates	Calculated Net Revenue@
Customer Charge	424	\$ 250.00	\$	106,000.00	\$ 250.00	\$ 250.00	\$	106,000.00
<b>Commodity Charge</b>	<b>Mcf Present Rate</b>							
First 1,000 Mcf	301,642	\$ 1.6000		482,627.68	\$ 1.6000	\$ 0.1600		482,627.68
Next 4,000 Mcf	593,018	\$ 1.2000		711,621.72	\$ 1.2000	\$ 0.1200		711,621.72
Next 5,000 Mcf	142,299	\$ 0.8000		113,839.12	\$ 0.8000	\$ 0.0800		113,839.12
Over 10,000 Mcf	10,418	\$ 0.6000		6,250.80	\$ 0.6000	\$ 0.0600		6,250.80
<b>Calculated Billings at Base Rates</b>	<b>1,047,377</b>		<b>\$</b>	<b>1,420,339.32</b>			<b>\$</b>	<b>1,420,339.32</b>
<b>Correction Factor -(Calculated / Actual)</b>				0.99531				0.99531
<b>Total After Application of Correction Factor</b>			<b>\$</b>	<b>1,427,028.92</b>			<b>\$</b>	<b>1,427,028.92</b>
<b>Temperature Normalization</b>								
First 1,000 Mcf		\$ 1.6000		-	\$ 1.6000	\$ 0.1600		-
Adjusted Billings at Base Rates	<b>Mcf</b>		<b>\$</b>	<b>1,427,028.92</b>			<b>\$</b>	<b>1,427,028.92</b>
Increase in Revenue	1,047,377						\$	0.0%



## **Seelye Exhibit 5**

Class Cost of Service Study

Functional Assignment  
& Classification

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Gas Plant at Original Cost</b>									
Underground Storage Plant	PT350	F003	\$ 14,934,082	14,934,082	-	-	-	-	-
350-358 Underground Storage Plant	PTST		\$ 14,934,082	\$ 14,934,082	\$ -	\$ -	\$ -	\$ -	\$ -
Total Storage Plant									
Transmission Plant	PT365	F005	\$ 57,620,977	-	-	57,620,977	-	-	-
325-371 Transmission									
Distribution Plant	PT374	F008	\$ 327,685	-	-	-	-	-	327,685
374 & 304 Land and Land Rights	PT375	F008	112,359	-	-	-	-	-	112,359
375 Structures & Improvements	PT376	F009	66,875,339	-	-	-	-	-	-
376 Mains	PT378	F008	1,435,143	-	-	-	-	-	1,435,143
378 Meas. & Reg. Sta. Equip. - General	PT379	F008	500,033	-	-	-	-	-	500,033
379 Meas. & Reg. Sta. Equip. - City Gate	PT380	F010	13,709,009	-	-	-	-	-	-
380 Services	PT381	F011	9,302,928	-	-	-	-	-	-
381 Meters	PT382	F011	3,186,037	-	-	-	-	-	-
382 Meter Installations	PT383	F011	3,478,550	-	-	-	-	-	-
383 House Regulators	PT384	F011	-	-	-	-	-	-	-
384 House Regulator Installations	PT385	F011	1,597,032	-	-	-	-	-	-
385 Industrial Meas. & Reg. Equip.	PT387	F011	80,914	-	-	-	-	-	-
387 Other Equipment	MTOVT		-	-	-	-	-	-	-
Mt. Olivet									
Sub-Total Distribution Plant	PTDSUB		\$ 100,605,029	-	-	-	-	-	2,375,221
Transmission & Distribution Subtotal	TDSUB		\$ 158,225,007	\$ -	\$ -	\$ 57,620,977	\$ -	\$ -	2,375,221
U-T-D Subtotal	PTSUB		\$ 173,160,089	14,934,082	-	57,620,977	-	-	2,375,221
117 Gas Stored Underground/Non-Current	PT117	F003	\$ 4,208,069	4,208,069	-	-	-	-	729
301-303 Intangible Plant	PT301	PTSUB	53,151	4,584	-	17,686	-	-	-
389-399 General Plant	PT389	PTSUB	21,242,491	1,832,045	-	7,068,679	-	-	291,381
Common Utility Plant	PTCP	PTSUB	-	-	-	-	-	-	-
Total Plant in Service	PTIS		\$ 198,663,799	20,978,780	-	64,707,343	-	-	2,667,331



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Gas Plant at Original Cost</b>								
Underground Storage Plant	PT350	F003						
350-358 Underground Storage Plant	PTST		\$	\$			\$	
Total Storage Plant								
Transmission Plant	PT365	F005						
325-371 Transmission								
Distribution Plant	PT374	F008						
374 & 304 Land and Land Rights	PT375	F008						
375 Structures & Improvements	PT376	F009		44,666,039				
376 Mains	PT378	F008						
378 Meas. & Reg. Sta. Equip. - General	PT379	F008						
379 Meas. & Reg. Sta. Equip. - City Gate	PT380	F010			13,709,009			
380 Services	PT381	F011				9,302,928		
381 Meters	PT382	F011				3,186,037		
382 Meter Installations	PT383	F011				3,478,550		
383 House Regulators	PT384	F011						
384 House Regulator Installations	PT385	F011				1,597,032		
385 Industrial Meas. & Reg. Equip.	PT387	F011				80,914		
387 Other Equipment	MTOV							
Mt. Olivet								
Sub-Total Distribution Plant	PTDSUB		22,209,300	44,666,039	13,709,009	17,645,461		
Transmission & Distribution Subtotal	TDSUB		\$ 22,209,300	\$ 44,666,039	\$ 13,709,009	\$ 17,645,461	\$	
U-T-D Subtotal	PTSUB		22,209,300	44,666,039	13,709,009	17,645,461		
117 Gas Stored Underground/Non-Current	PT117	F003						
301-303 Intangible Plant	PT301	PTSUB	6,817	13,710	4,208	5,416		
389-399 General Plant	PT389	PTSUB	2,724,536	5,479,426	1,681,759	2,164,665		
Common Utility Plant	PTCP	PTSUB						
Total Plant in Service	PTIS		24,940,653	50,159,175	15,394,975	19,815,542		

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<u>Gas Plant at Original Cost (Continued)</u>									
Construction Work In Progress									
Underground Storage	CWIPUS	F003	\$ -	-	-	-	-	-	-
Transmission	CWIPTR	F005	\$ 71,157	-	-	71,157	-	-	-
Distribution Mains	CWIPDM	F009	\$ (38,587)	-	-	-	-	-	-
Other Distribution	CWIPOD	PTDSUB	\$ 27,411	-	-	-	-	-	647
General	CWIPCO	PT389	\$ 441,990	38,119	-	147,077	-	-	6,053
Total CWIP	CWIP		\$ 501,971	38,119	-	218,234	-	-	6,710
Total Gas Plant at Original Cost	PTT		\$ 199,165,770	21,016,899	-	64,925,577	-	-	2,674,041

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer	
<u>Gas Plant at Original Cost (Continued)</u>									
Construction Work in Progress									
Underground Storage	CWIPUS	F003	-	-	-	-	-	-	-
Transmission	CWIPTR	F005	-	-	-	-	-	-	-
Distribution Mains	CWIPDM	F009	(12,815)	(25,772)	-	-	-	-	-
Other Distribution	CWIPOD	PTDSUB	6,051	12,170	3,735	4,808	-	-	-
General	CWIPCO	PT389	56,689	114,010	34,992	45,040	-	-	-
Total CWIP	CWIP		49,926	100,407	38,727	49,848	-	-	-
Total Gas Plant at Original Cost	PTT		24,990,578	50,259,582	15,433,703	19,865,390	-	-	-

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Net Cost Rate Base</b>									
Total Gas Utility Plant at Original Cost			\$ 199,165,770	\$ 21,016,899	\$ -	\$ 64,925,577	\$ -	\$ -	\$ 2,674,041
<b>Less:</b>									
<b>Reserve for Depreciation</b>									
Underground Storage	DEPRUS	PTST	5,126,945	5,126,945	-	-	-	-	-
Transmission	DEPTR	F005	20,483,644	-	-	20,483,644	-	-	-
Distribution	DEPRDI	PTDSUB	33,817,598	-	-	-	-	-	798,412
General	DEPRGE	PT389	10,824,054	933,514	-	3,601,826	-	-	148,473
Common	DEPRCO	PTCP	-	-	-	-	-	-	-
Total Depreciation Reserve	DEPR		\$ 70,252,241	\$ 6,060,459	\$ -	\$ 24,085,470	\$ -	\$ -	\$ 946,884
Depreciation Adjustment	CAD	DEPR	1,112,824	96,000	-	381,524	-	-	14,999
Customer Advances For Construction	DIT	CADAL	54,605	-	-	-	-	-	-
Accum. Deferred Income Taxes	ITC	PTSUB	29,427,209	2,537,931	-	9,792,237	-	-	403,650
Investment Tax Credit	FAS109	PTSUB	-	-	-	-	-	-	-
Deferred Income Taxes-FAS 109									
<b>PLUS:</b>									
Materials and Supplies	MSP	PTSUB	596,121	51,412	-	198,366	-	-	8,177
Prepayments	PPY	PTSUB	1,631,711	140,726	-	542,970	-	-	22,382
Gas Stored Underground	GSU	F003	3,777,901	3,777,901	-	-	-	-	-
Cash Working Capital	CWC	OMT	1,658,306	56,576	170,895	403,413	56,991	13,064	18,221
Adjustments:									
Unamortized Debt	PTSUB	PTSUB	4,542,382	391,755	-	1,511,529	-	-	62,307
Utility ARO Assets	PTT	DEPR	(138,345)	(14,599)	-	(45,099)	-	-	(1,857)
A/D on ARO Assets	DEPR		134,408	11,595	-	46,081	-	-	1,812
Net Cost Rate Base	NCRB		\$ 110,521,375	\$ 16,737,875	\$ 170,895	\$ 33,323,606	\$ 56,991	\$ 13,064	\$ 1,419,548



**DELTA NATURAL GAS COMPANY**  
**Cost of Service Study**  
**12 Months Ended December 31, 2009**

**Functional Assignment and Classification**

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Net Cost Rate Base</b>			\$	\$	\$	\$	\$	\$
<b>Total Gas Utility Plant at Original Cost</b>			24,990,578	50,259,582	15,433,703	19,865,390	-	-
<b>Less:</b>								
<b>Reserve for Depreciation</b>								
Underground Storage	DEPRUS	PTST	-	-	-	-	-	-
Transmission	DEPTR	F005	-	-	-	-	-	-
Distribution	DEPRDI	PTDSUB	7,465,483	15,014,141	4,608,177	5,931,385	-	-
General	DEPRGE	PT389	1,386,280	2,792,027	856,936	1,102,999	-	-
Common	DEPRCO	PTCP	-	-	-	-	-	-
<b>Total Depreciation Reserve</b>	DEPR		8,853,763	17,806,168	5,465,112	7,034,384	\$	\$
<b>Depreciation Adjustment</b>								
Customer Advances For Construction	CAD	DEPR	140,247	282,057	86,570	111,427	-	-
Accum. Deferred Income Taxes	DIT	CADAL	15,049	30,266	9,289	-	-	-
Investment Tax Credit	ITC	PTSUB	3,774,298	7,590,646	2,329,739	2,998,709	-	-
Deferred Income Taxes-FAS 109	FAS109	PTSUB	-	-	-	-	-	-
<b>PLUS:</b>								
Materials and Supplies	MSP	PTSUB	76,458	153,767	47,195	60,746	-	-
Prepayments	PPY	PTSUB	209,281	420,894	129,182	166,276	-	-
Gas Stored Underground	GSU	F003	-	-	-	-	-	-
Cash Working Capital	CWC	OMT	178,981	359,956	103,170	144,343	152,473	224
<b>Adjustments:</b>								
Unamortized Debt		PTSUB	582,600	1,171,692	359,618	462,880	-	-
Utility ARO Assets		PTT	(17,359)	(34,911)	(10,721)	(13,799)	-	-
A/D on ARO Assets		DEPR	16,939	34,067	10,456	13,458	-	-
<b>Net Cost Rate Base</b>	NCRB		\$ 13,254,121	\$ 26,655,910	\$ 8,181,893	\$ 10,554,775	\$ 152,473	\$ 224

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Labor Expenses</b>									
<b>Production Expenses</b>									
<b>Operation &amp; Maintenance</b>									
753 Wells and Gathering	LB 753	F006	21,827	-	-	-	21,827	-	-
754 Compressor Station	LB754	F006	102,954	-	-	-	102,954	-	-
764 Maintenance of Wells and Gathering	LB764	F006	166	-	-	-	166	-	-
765 Maintenance of Compressor Station	LB765	F006	3,525	-	-	-	3,525	-	-
<b>Total Production Operation &amp; Maintenance Expenses</b>			<b>128,472</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>128,472</b>	<b>-</b>	<b>-</b>
807-913 Procurement Expenses	LB807	DMCM	\$ -	-	-	-	-	-	-
<b>Storage Expenses</b>									
<b>Operation</b>									
814 Operations Supervision and Engineer	LB814	OSE	-	-	-	-	-	-	-
815 Maps and Records	LB815	F003	-	-	-	-	-	-	-
816 Well Expenses	LB816	F003	97,523	97,523	-	-	-	-	-
817 Lines Expenses	LB817	F003	-	-	-	-	-	-	-
818 Compressor Station Exp - Payroll	LB818	F004	20,175	-	20,175	-	-	-	-
819 Compressor Station Fuel and Power	LB819	F004	-	-	-	-	-	-	-
820 Measurement and Regulator Station	LB820	F003	-	-	-	-	-	-	-
821 Purification of Natural Gas	LB821	F004	-	-	-	-	-	-	-
823 Gas losses	LB823	F004	-	-	-	-	-	-	-
824 Other Expenses	LB824	F004	-	-	-	-	-	-	-
825 Storage Well Royalties	LB825	F003	-	-	-	-	-	-	-
826 Rents	LB826	F003	-	-	-	-	-	-	-
<b>Total Storage Operation Labor</b>	LBSO		<b>\$ 117,698</b>	<b>\$ 97,523</b>	<b>\$ 20,175</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Storage Expense Maintenance</b>									
830 Maintenance Super and Eng.	LB830	MSE	\$ -	-	-	-	-	-	-
831 Maintenance of Structures	LB831	F003	-	-	-	-	-	-	-
832 Maintenance of Reservoirs	LB832	F003	613	613	-	-	-	-	-
833 Maintenance of Lines	LB833	F003	-	-	-	-	-	-	-
834 Main of Compressor Station Equipment	LB834	F004	1,494	-	1,494	-	-	-	-
835 Main of Meas and Reg Sta. Equip	LB835	F003	427	427	-	-	-	-	-
836 Main of Purification Equip	LB836	F004	-	-	-	-	-	-	-
837 Main of Other Equipment	LB837	F003	-	-	-	-	-	-	-
<b>Total Maintenance Labor</b>	LBSM		<b>\$ 2,534</b>	<b>\$ 1,040</b>	<b>\$ 1,494</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Total Storage Labor</b>	LBS		<b>\$ 120,232</b>	<b>\$ 98,563</b>	<b>\$ 21,669</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Labor Expenses</b>								
<b>Production Expenses</b>								
<b>Operation &amp; Maintenance</b>								
753 Wells and Gathering	LB 753	F006	-	-	-	-	-	-
754 Compressor Station	LB754	F006	-	-	-	-	-	-
764 Maintenance of Wells and Gathering	LB764	F006	-	-	-	-	-	-
765 Maintenance of Compressor Station	LB765	F006	-	-	-	-	-	-
Total Production Operation & Maintenance Expenses								
807-813 Procurement Expenses	LB807	DMCM	-	-	-	-	-	-
<b>Storage Expenses</b>								
<b>Operation</b>								
814 Operations Supervision and Engineer	LB814	OSE	-	-	-	-	-	-
815 Maps and Records	LB815	F003	-	-	-	-	-	-
816 Well Expenses	LB816	F003	-	-	-	-	-	-
817 Lines Expenses	LB817	F003	-	-	-	-	-	-
818 Compressor Station Exp - Payroll	LB818	F004	-	-	-	-	-	-
819 Compressor Station Fuel and Power	LB819	F004	-	-	-	-	-	-
820 Measurement and Regulator Station	LB820	F003	-	-	-	-	-	-
821 Purification of Natural Gas	LB821	F004	-	-	-	-	-	-
823 Gas losses	LB823	F004	-	-	-	-	-	-
824 Other Expenses	LB824	F004	-	-	-	-	-	-
825 Storage Well Royalties	LB825	F003	-	-	-	-	-	-
826 Rents	LB826	F003	-	-	-	-	-	-
Total Storage Operation Labor	LBSO		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Storage Expense</b>								
<b>Maintenance</b>								
830 Maintenance Super and Eng.	LB830	MSE	-	-	-	-	-	-
831 Maintenance of Structures	LB831	F003	-	-	-	-	-	-
832 Maintenance of Reservoirs	LB832	F003	-	-	-	-	-	-
833 Maintenance of Lines	LB833	F003	-	-	-	-	-	-
834 Man of Compressor Station Equipment	LB834	F004	-	-	-	-	-	-
835 Main of Meas and Reg Sta. Equip	LB835	F003	-	-	-	-	-	-
836 Main of Purification Equip	LB836	F004	-	-	-	-	-	-
837 Main of Other Equipment	LB837	F003	-	-	-	-	-	-
Total Maintenance Labor	LBSM		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Storage Labor	LBS		-	-	-	-	-	-

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Labor Expenses (Continued)</b>									
Transmission									
850-867	Transmission Expenses		\$						
		F005							
		LB850							
<b>Distribution Expenses</b>									
Operation			\$						
870	Operation Supr and Engr	DOES							
871	Dist Load Dispatching	F007							
872	Compr. Station Labor and Exp.	F007							
873	Compr. Station Fuel and Power	F007							
874.01	Other Mains/Serv. Expenses	CADAL							
874.02	Leak Survey-Mains	F009							
874.03	Leak Survey - Service	F010							
874.04	Locate Main per Request	CADAL							
874.05	Check Stop Box Access	F010							
874.06	Patrolling Mains	F009							
874.07	Check/Grease Valves	F009							
874.08	Opr. Odor Equipment	F007							
874.09	Locate and Inspect Valve Boxes	F009							
874.1	Cut Grass - Right of Way	F009							
875	Meas and Reg Station Exp.- General	F008							
876	Meas and Reg Station Exp.- Industrial	F011							
877	Meas and Reg Station Exp. - City Gate	F008							
878	Meter and House Reg. Expense	F011							
879	Customer Installation Expense	F011							
880	Other Expenses	PTDSUB							
881	Rents	PTDSUB							
Total Operations Distribution Labor	LBDO		\$	\$		\$	\$	\$	\$
Total Operations Transmission and Distribution Labor	LBTD0		\$	\$		\$	124,781	\$	\$



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Labor Expenses (Continued)</b>								
Transmission								
850-867 Transmission Expenses	LB850	F005	-	-	-	-	-	-
<b>Distribution Expenses</b>								
Operation								
870 Operation Supr and Engr	LB870	DOES	-	-	-	-	-	-
871 Dist Load Dispatching	LB871	F007	-	-	-	-	-	-
872 Compr. Station Labor and Exp.	LB872	F007	-	-	-	-	-	-
873 Other Mains/Serv. Expenses	LB873	F007	-	-	-	-	-	-
874.01 Leak Survey-Mains	LB874.01	CADAL	-	-	-	-	-	-
874.02 Leak Survey - Service	LB874.02	F009	-	-	-	-	-	-
874.03 Locate Main per Request	LB874.03	F010	-	-	-	-	-	-
874.04 Check Stop Box Access	LB874.04	CADAL	-	-	-	-	-	-
874.05 Patrolling Mains	LB874.05	F010	-	-	-	-	-	-
874.06 Check/Grease Valves	LB874.06	F009	-	-	-	-	-	-
874.07 Opr. Odor Equipment	LB874.07	F009	-	-	-	-	-	-
874.08 Locate and Inspect Valve Boxes	LB874.08	F009	-	-	-	-	-	-
874.09 Cut Grass - Right of Way	LB874.09	F009	-	-	-	-	-	-
874.1 Meas and Reg Station Exp. - General	LB874.10	F008	-	-	-	-	-	-
875 Meas and Reg Station Exp. - Industrial	LB875	F011	-	-	-	-	-	-
876 Meas and Reg Station Exp. - City Gate	LB876	F008	-	-	-	-	-	-
877 Meter and House Reg. Expense	LB877	F011	-	-	-	-	-	-
878 Customer Installation Expense	LB878	F011	-	-	-	-	-	-
879 Other Expenses	LB879	PTDSUB	-	-	-	-	-	-
880 Rents	LB880	PTDSUB	-	-	-	-	-	-
881	LB881	PTDSUB	-	-	-	-	-	-
Total Operations Distribution Labor	LBDO		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Operations Transmission and Distribution Labor	LBTD0		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Labor Expenses (Continued)</b>									
<b>Maintenance Expense -- Transmission and Distribution</b>									
885 Maintenance Supr and Engr	LB885	DMES	-	-	-	-	-	-	-
886 Maintenance Structures	LB886	F008	-	-	-	-	-	-	-
887 Maintenance Mains	LB887	F009	81,259	-	-	-	-	-	-
888 Maintenance Comp. Station Equip.	LB888	F007	-	-	-	-	-	-	-
889 Maintenance Meas and Reg. General	LB889	F008	-	-	-	-	-	-	-
890 Maintenance Meas and Reg - Industrial	LB890	F011	-	-	-	-	-	-	-
891 Maintenance Meas and Reg - City Gate	LB891	F008	-	-	-	-	-	-	-
892 Maintenance Services	LB892	F010	-	-	-	-	-	-	-
893 Maintenance Meters and House Reg.	LB893	F011	18,717	-	-	-	-	-	135
894 Maintenance Other Equipment	LB894	PTDSUB	5,703	-	-	-	-	-	-
898 Maintenance Transportation Equip	LB898	PTDSUB	-	-	-	-	-	-	-
900 Trans & Distribution Expenses	LB900	TDSUB	2,692,246	-	-	980,432	-	-	40,415
Total Maintenance Labor	LBDM		2,797,925	\$ -	\$ -	980,432	\$ -	\$ -	40,549
Total Transmission & Distribution Labor	LBTD		2,926,397	\$ -	\$ -	980,432	\$ 128,472	\$ -	40,549
<b>Customer Accounts Expense</b>									
901 Supervision	LB901	F012	-	-	-	-	-	-	-
902 Meter Reading	LB902	F012	-	-	-	-	-	-	-
903 Customer Records and Collections	LB903	F012	439,440	-	-	-	-	-	-
904 Uncollectible Accounts	LB904	F012	-	-	-	-	-	-	-
905 Misc. Cust Account Expenses	LB905	F012	-	-	-	-	-	-	-
Total Customer Accounts Labor	LBCA		439,440	\$ -	\$ -	-	\$ -	\$ -	-
<b>Customer Service Expenses</b>									
907-910 Customer Service	LB907	F013	-	-	-	-	-	-	-
<b>Sales Expenses</b>									
911-916 Sales Expenses	LB911	F013	-	-	-	-	-	-	-

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Labor Expenses (Continued)</b>								
<b>Maintenance Expense -- Transmission and Distribution</b>								
885	Maintenance Supr and Engr	DMES	-	-	-	-	-	-
886	Maintenance Structures	F008	-	-	-	-	-	-
887	Maintenance Mains	F009	26,986	54,273	-	-	-	-
888	Maintenance Comp. Station Equip.	F007	-	-	-	-	-	-
889	Maintenance Meas and Reg. General	F008	-	-	-	-	-	-
890	Maintenance Meas and Reg. - Industrial	F011	-	-	-	-	-	-
891	Maintenance Meas and Reg. - City Gate	F008	-	-	-	-	-	-
892	Maintenance Services	F010	-	-	-	-	-	-
893	Maintenance Meters and House Reg.	F011	-	-	-	18,717	-	-
894	Maintenance Other Equipment	PTDSUB	1,259	2,532	777	1,000	-	-
898	Maintenance Transportation Equip	PTDSUB	-	-	-	-	-	-
900	Trans & Distribution Expenses	TDSUB	377,896	760,001	233,261	300,241	-	-
Total Maintenance Labor	LBDM		\$ 406,141	\$ 816,806	\$ 234,039	\$ 319,958	\$ -	\$ -
Total Transmission & Distribution Labor	LBTD		\$ 406,141	\$ 816,806	\$ 234,039	\$ 319,958	\$ -	\$ -
<b>Customer Accounts Expense</b>								
901	Supervision	F012	-	-	-	-	-	-
902	Meter Reading	F012	-	-	-	-	-	-
903	Customer Records and Collections	F012	-	-	-	-	439,440	-
904	Uncollectible Accounts	F012	-	-	-	-	-	-
905	Misc. Cust Account Expenses	F012	-	-	-	-	-	-
Total Customer Accounts Labor	LBCA		\$ -	\$ -	\$ -	\$ -	\$ 439,440	\$ -
<b>Customer Service Expenses</b>								
907-910	Customer Service	F013	-	-	-	-	-	-
<b>Sales Expenses</b>								
911-916	Sales Expenses	F013	-	-	-	-	-	-

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Labor Expenses (Continued)</b>									
<b>Administrative &amp; General</b>									
920 Admin and General Salaries	LB920	LBSUB	\$						
921 Office Supplies and Expense	LB921	LBSUB		71,925	15,813	715,457	93,751		29,590
922 Admin. Expenses Transferred	LB922	LBSUB							
923 Outside Services Employed	LB923	OMSUB							
924 Property Insurance	LB924	PTT							
925 Injuries and Damages	LB925	PTT							
926 Employee Pensions and Benefits	LB926	LBSUB		27,985	6,152	278,371	36,477		11,513
927 Franchise Requirement	LB927	PTT							
928 Regulatory Commission Fee	LB928	PTT							
929 Duplicate Charges -Credit	LB929	PTT							
930.1 General Advertising Expense	LB930.1	PTT							
930.2 Misc. General Expense	LB930.2	OMSUB							
931 Rents	LB931	PTT							
935 Maintenance of General Plant	LB935	PT389							
Total Administrative and General Labor	LBAG		\$	99,910	21,965	993,829	130,227	\$	41,104
Total Labor Expense	LBTOT		\$	198,473	43,634	1,974,261	258,699	\$	81,653



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Labor Expenses (Continued)</b>								
<b>Administrative &amp; General</b>								
920 Admin and General Salaries	LB920	LBSUB	296,376	596,054	170,787	233,485	320,675	-
921 Office Supplies and Expense	LB921	LBSUB	-	-	-	-	-	-
922 Admin. Expenses Transferred	LB922	LBSUB	-	-	-	-	-	-
923 Outside Services Employed	LB923	OMSUB	-	-	-	-	-	-
924 Property Insurance	LB924	PTT	-	-	-	-	-	-
925 Injuries and Damages	LB925	PTT	-	-	-	-	-	-
926 Employee Pensions and Benefits	LB926	LBSUB	115,314	231,913	66,450	90,845	124,769	-
927 Franchise Requirement	LB927	PTT	-	-	-	-	-	-
928 Regulatory Commission Fee	LB928	PTT	-	-	-	-	-	-
929 Duplicate Charges -Dredit	LB929	PTT	-	-	-	-	-	-
930.1 General Advertising Expense	LB930.1	PTT	-	-	-	-	-	-
930.2 Misc. General Expense	LB930.2	OMSUB	-	-	-	-	-	-
931 Rents	LB931	PTT	-	-	-	-	-	-
935 Maintenance of General Plant	LB935	PT389	-	-	-	-	-	-
Total Administrative and General Labor	LBAG		\$ 411,690	\$ 827,967	\$ 237,236	\$ 324,330	\$ 445,444	\$ -
Total Labor Expense	LBTOT		\$ 817,831	\$ 1,644,773	\$ 471,275	\$ 644,288	\$ 884,884	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Operation &amp; Maintenance Expenses</b>									
<b>Production Expenses</b>									
<b>Operation &amp; Maintenance</b>									
753 Wells and Gathering	OM753	F006	21,969	-	-	-	21,969	-	-
754 Compressor Station	OM754	F006	196,198	-	-	-	196,198	-	-
764 Maintenance of Wells and Gathering	OM764	F006	166	-	-	-	166	-	-
765 Maintenance of Compressor Station	OM765	F006	34,929	-	-	-	34,929	-	-
Total Production Operation & Maintenance Expenses			253,262	-	-	-	253,262	-	-
807-813 Procurement Expenses	OM807	DMCM	-	-	-	-	-	-	-
<b>Storage Expenses</b>									
<b>Operation</b>									
814 Operations Supervision and Engineer	OM814	OSE	-	-	-	-	-	-	-
815 Maps and Records	OM815	F003	-	-	-	-	-	-	-
816 Well Expenses	OM816	F003	109,451	109,451	-	-	-	-	-
817 Lines Expenses	OM817	F003	-	-	-	-	-	-	-
818 Compressor Station Exp - Payroll	OM818	F004	52,201	-	52,201	-	-	-	-
819 Compressor Station Fuel and Power	OM819	F004	-	-	-	-	-	-	-
820 Measurement and Regulator Station	OM820	F003	-	-	-	-	-	-	-
821 Purification of Natural Gas	OM821	F004	120,817	-	120,817	-	-	-	-
823 Gas losses	OM823	F004	867,900	-	867,900	-	-	-	-
824 Other Expenses	OM824	F004	27,005	-	27,005	-	-	-	-
825 Storage Well Royalties	OM825	F003	56,681	56,681	-	-	-	-	-
826 Rents	OM826	F003	-	-	-	-	-	-	-
Total Operation Expenses	OMOE		1,234,055	166,132	1,067,923	-	-	-	-
<b>Storage Expense</b>									
<b>Maintenance</b>									
830 Maintenance Super and Eng.	OM830	MSE	-	-	-	-	-	-	-
831 Maintenance of Structures	OM831	F003	5,844	5,844	-	-	-	-	-
832 Maintenance of Reservoirs	OM832	F003	613	613	-	-	-	-	-
833 Maintenance of Lines	OM833	F003	-	-	-	-	-	-	-
834 Main of Compressor Station Equipment	OM834	F004	12,355	-	12,355	-	-	-	-
835 Main of Meas and Reg Sta. Equip	OM835	F003	2,066	2,066	-	-	-	-	-
836 Main of Purification Equip	OM836	F004	-	-	-	-	-	-	-
837 Main of Other Equipment	OM837	F003	1,154	1,154	-	-	-	-	-
Total Maintenance Expense	OMME		22,033	9,678	12,355	-	-	-	-
Total Storage Expense	OMS		1,256,088	175,810	1,080,278	-	-	-	-

**DELTA NATURAL GAS COMPANY**  
**Cost of Service Study**  
**12 Months Ended December 31, 2009**

**Functional Assignment and Classification**

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Operation &amp; Maintenance Expenses</b>								
<b>Production Expenses</b>								
<b>Operation &amp; Maintenance</b>								
753 Wells and Gathering	OM 753	F006	-	-	-	-	-	-
754 Compressor Station	OM754	F006	-	-	-	-	-	-
764 Maintenance of Wells and Gathering	OM764	F006	-	-	-	-	-	-
765 Maintenance of Compressor Station	OM765	F006	-	-	-	-	-	-
<b>Total Production Operation &amp; Maintenance Expenses</b>								
807-813 Procurement Expenses	OM807	DMCM	-	-	-	-	-	-
<b>Storage Expenses</b>								
<b>Operation</b>								
814 Operations Supervision and Engineer	OM814	OSE	-	-	-	-	-	-
815 Maps and Records	OM815	F003	-	-	-	-	-	-
816 Well Expenses	OM816	F003	-	-	-	-	-	-
817 Lines Expenses	OM817	F003	-	-	-	-	-	-
818 Compressor Station Exp - Payroll	OM818	F004	-	-	-	-	-	-
819 Compressor Station Fuel and Power	OM819	F004	-	-	-	-	-	-
820 Measurement and Regulator Station	OM820	F003	-	-	-	-	-	-
821 Purification of Natural Gas	OM821	F004	-	-	-	-	-	-
823 Gas losses	OM823	F004	-	-	-	-	-	-
824 Other Expenses	OM824	F004	-	-	-	-	-	-
825 Storage Well Royalties	OM825	F003	-	-	-	-	-	-
826 Rents	OM826	F003	-	-	-	-	-	-
<b>Total Operation Expenses</b>								
	OMOE		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Storage Expense</b>								
<b>Maintenance</b>								
830 Maintenance Super and Eng.	OM830	MSE	-	-	-	-	-	-
831 Maintenance of Structures	OM831	F003	-	-	-	-	-	-
832 Maintenance of Reservoirs	OM832	F003	-	-	-	-	-	-
833 Maintenance of Lines	OM833	F003	-	-	-	-	-	-
834 Man of Compressor Station Equipment	OM834	F004	-	-	-	-	-	-
835 Man of Meas and Reg Sta. Equip	OM835	F003	-	-	-	-	-	-
836 Man of Purification Equip	OM836	F004	-	-	-	-	-	-
837 Man of Other Equipment	OM837	F003	-	-	-	-	-	-
<b>Total Maintenance Expense</b>								
	OMME		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total Storage Expense</b>								
	OMS		-	-	-	-	-	-

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Operation &amp; Maintenance Expenses (Continued)</b>									
850-867 Transmission Expenses	OM850	F005	\$ 121,438	-	-	121,438	-	-	-
<b>Distribution Expenses</b>									
870 Operation Supr and Engr	OM870	DOES	-	-	-	-	-	84,043	-
871 Dist Load Dispatching	OM871	F007	84,043	-	-	-	-	-	-
872 Compr. Station Labor and Exp.	OM872	F007	-	-	-	-	-	-	-
873 Compr. Station Fuel and Power	OM873	F007	-	-	-	-	-	-	-
874.01 Other Mains/Serv. Expenses	OM874.01	CADAL	-	-	-	-	-	-	-
874.02 Leak Survey-Mains	OM874.02	F009	-	-	-	-	-	-	-
874.03 Leak Survey - Service	OM874.03	F010	-	-	-	-	-	-	-
874.04 Locate Main per Request	OM874.04	CADAL	-	-	-	-	-	-	-
874.05 Check Stop Box Access	OM874.05	F010	-	-	-	-	-	-	-
874.06 Patrolling Mains	OM874.06	F009	-	-	-	-	-	-	-
874.07 Check/Grease Valves	OM874.07	F009	-	-	-	-	-	-	-
874.08 Opr. Odor Equipment	OM874.08	F007	-	-	-	-	-	-	-
874.09 Locate and Inspect Valve Boxes	OM874.09	F009	-	-	-	-	-	-	-
874.1 Cut Grass - Right of Way	OM874.10	F009	-	-	-	-	-	-	-
875 Meas and Reg Station Exp.- General	OM875	F008	-	-	-	-	-	-	-
876 Meas and Reg Station Exp.- Industrial	OM876	F011	-	-	-	-	-	-	-
877 Meas and Reg Station Exp. - City Gate	OM877	F008	-	-	-	-	-	-	-
878 Meter and House Reg. Expense	OM878	F011	-	-	-	-	-	-	-
879 Customer Installation Expense	OM879	F011	359,498	-	-	-	-	-	8,488
880 Other Expenses	OM880	PTDSUB	15,104	-	-	-	-	-	357
881 Rents	OM881	PTDSUB	-	-	-	-	-	-	-
Total Operations Distribution Expense	OMDO		\$ 456,645	-	-	-	-	84,043	8,844
Total Transmission and Distribution Oper Exp	OMTDO		\$ 798,249	\$ -	\$ -	121,438	\$ 218,167	\$ 84,043	\$ 8,844



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Operation &amp; Maintenance Expenses (Continued)</b>								
850-867 Transmission Expenses	OM850	F005	-	-	-	-	-	-
<b>Distribution Expenses</b>								
870 Operation Supr and Engr	OM870	DOES	-	-	-	-	-	-
871 Dist Load Dispatching	OM871	F007	-	-	-	-	-	-
872 Compr. Station Labor and Exp.	OM872	F007	-	-	-	-	-	-
873 Compr. Station Fuel and Power	OM873	F007	-	-	-	-	-	-
874.01 Other Mains/Serv. Expenses	OM874.01	CADAL	-	-	-	-	-	-
874.02 Leak Survey-Mains	OM874.02	F009	-	-	-	-	-	-
874.03 Leak Survey - Service	OM874.03	F010	-	-	-	-	-	-
874.04 Locale Main per Request	OM874.04	CADAL	-	-	-	-	-	-
874.05 Check Stop Box Access	OM874.05	F010	-	-	-	-	-	-
874.06 Patrolling Mains	OM874.06	F009	-	-	-	-	-	-
874.07 Check/Grease Valves	OM874.07	F009	-	-	-	-	-	-
874.08 Opr. Odor Equipment	OM874.08	F007	-	-	-	-	-	-
874.09 Locate and Inspect Valve Boxes	OM874.09	F009	-	-	-	-	-	-
874.1 Cut Grass - Right of Way	OM874.10	F009	-	-	-	-	-	-
875 Meas and Reg Station Exp.- General	OM875	F008	-	-	-	-	-	-
876 Meas and Reg Station Exp.- Industrial	OM876	F011	-	-	-	-	-	-
877 Meas and Reg Station Exp. - City Gate	OM877	F008	-	-	-	-	-	-
878 Meter and House Reg. Expense	OM878	F011	-	-	-	-	-	-
879 Customer Installation Expense	OM879	F011	-	-	-	-	-	-
880 Other Expenses	OM880	PTDSUB	79,362	159,608	48,987	63,054	-	-
881 Rents	OM881	PTDSUB	3,334	6,706	2,058	2,649	-	-
Total Operations Distribution Expense	OMDO		82,696	166,314	51,045	65,703	-	-
Total Transmission and Distribution Oper Exp	OMTDO		\$ 82,696	\$ 166,314	\$ 51,045	\$ 65,703	\$ -	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Operation &amp; Maintenance Expenses (Continued)</b>									
<b>Maintenance Expense – Transmission and Distribution</b>									
885	Maintenance Supr and Engr	DMES	-	-	-	-	-	-	-
886	Maintenance Structures	F008	-	-	-	-	-	-	-
887	Maintenance Mains	F009	157,799	-	-	-	-	-	-
888	Maintenance Comp. Station Equip.	F007	-	-	-	-	-	-	-
889	Maintenance Meas and Reg. General	F008	2,221	-	-	-	-	-	2,221
890	Maintenance Meas and Reg - Industrial	F011	-	-	-	-	-	-	-
891	Maintenance Meas and Reg.-City Gate	F008	-	-	-	-	-	-	-
892	Maintenance Services	F010	-	-	-	-	-	-	-
893	Maintenance Meters and House Reg.	F011	57,773	-	-	-	-	-	3,074
894	Maintenance Other Equipment	PTDSUB	130,203	-	-	-	-	-	994
898	Maintenance Transportation Equip	PTDSUB	42,119	-	-	-	-	-	52,991
900	Trans & Distribution Expenses	TDSUB	3,530,029	-	-	1,285,526	-	-	99,281
Total Maintenance Expenses	OMME		\$ 3,920,144	\$ -	\$ -	\$ 1,285,526	\$ -	\$ -	\$ 99,281
Total Transmission & Distribution Expenses	OMDE		\$ 4,753,488	\$ -	\$ -	\$ 1,406,985	\$ 253,262	\$ 84,043	\$ 68,125
<b>Customer Accounts Expense</b>									
901	Supervision	F012	-	-	-	-	-	-	-
902	Meter Reading	F012	-	-	-	-	-	-	-
903	Customer Records and Collections	F012	778,501	-	-	-	-	-	-
904	Uncollectible Accounts	F012	(185,412)	-	-	-	-	-	-
905	Misc. Cust Account Expenses	F012	-	-	-	-	-	-	-
Total Customer Accounts Expense	OMCA		\$ 593,089	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Customer Service Expenses</b>									
907-910	Customer Service	F013	-	-	-	-	-	-	-
<b>Sales Expenses</b>									
911-916	Sales Expenses	F013	1,438	-	-	-	-	-	-

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Operation &amp; Maintenance Expenses (Continued)</b>								
<b>Maintenance Expense -- Transmission and Distribution</b>								
885 Maintenance Supr and Engr	OM885	DMES	-	-	-	-	-	-
886 Maintenance Structures	OM886	F008	-	-	-	-	-	-
887 Maintenance Mains	OM887	F009	52,405	105,394	-	-	-	-
888 Maintenance Comp. Station Equip.	OM888	F007	-	-	-	-	-	-
889 Maintenance Meas and Reg. General	OM889	F008	-	-	-	-	-	-
890 Maintenance Meas and Reg. - Industrial	OM890	F011	-	-	-	-	-	-
891 Maintenance Meas and Reg. - City Gate	OM891	F008	-	-	-	-	-	-
892 Maintenance Services	OM892	F010	-	-	-	-	-	-
893 Maintenance Meters and House Reg.	OM893	F011	-	-	-	57,773	-	-
894 Maintenance Other Equipment	OM894	PTDSUB	28,743	57,807	17,742	22,837	-	-
898 Maintenance Transportation Equip	OM898	PTDSUB	9,298	18,700	5,739	7,387	-	-
900 Trans & Distribution Expenses	OM900	TDSUB	495,490	996,501	305,849	393,671	-	-
Total Maintenance Expenses	OMME		\$ 585,937	\$ 1,178,402	\$ 329,330	\$ 481,668	\$ -	\$ -
Total Transmission & Distribution Expenses	OMDE		\$ 668,633	\$ 1,344,715	\$ 380,376	\$ 547,371	\$ -	\$ -
<b>Customer Accounts Expense</b>								
901 Supervision	OM901	F012	-	-	-	-	-	-
902 Meter Reading	OM902	F012	-	-	-	-	-	-
903 Customer Records and Collections	OM903	F012	-	-	-	-	778,501	-
904 Uncollectible Accounts	OM904	F012	-	-	-	-	(185,412)	-
905 Misc. Cust Account Expenses	OM905	F012	-	-	-	-	-	-
Total Customer Accounts Expense	OMCA		\$ -	\$ -	\$ -	\$ -	\$ 593,089	\$ -
<b>Customer Service Expenses</b>								
907-910 Customer Service	OM907	F013	-	-	-	-	-	-
Sales Expenses	OM911	F013	-	-	-	-	-	1,438
911-916 Sales Expenses	OM911	F013	-	-	-	-	-	1,438

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Operation &amp; Maintenance Expenses (Continued)</b>									
<b>Administrative &amp; General</b>									
920 Admin and General Salaries	OM920	LBSUB	\$ 2,628,513	74,317	16,339	739,251	96,869	-	30,575
921 Office Supplies and Expense	OM921	LBSUB	549,130	15,526	3,413	154,439	20,237	-	6,387
922 Admin. Expenses Transferred	OM922	LBSUB	(3,314,076)	(93,700)	(20,600)	(932,060)	(122,134)	-	(38,549)
923 Outside Services Employed	OM923	OMSUB	1,085,160	28,888	177,507	231,187	41,615	13,810	11,194
924 Property Insurance	OM924	PTT	846,315	89,307	-	275,888	-	-	11,363
925 Injuries and Damages	OM925	PTT	-	-	-	-	-	-	-
926 Employee Pensions and Benefits	OM926	LBSUB	3,978,940	112,498	24,733	1,119,049	146,636	-	46,282
927 Franchise Requirement	OM927	PTT	-	-	-	-	-	-	-
928 Regulatory Commission Fee	OM928	PTT	189,509	19,998	-	61,778	-	-	2,544
929 Duplicate Charges -Dredit	OM929	PTT	-	-	-	-	-	-	-
930.1 General Advertising Expense	OM930.1	PTT	-	-	-	-	-	-	-
930.2 Misc. General Expense	OM930.2	OMSUB	559,375	14,891	91,501	119,172	21,452	7,119	5,770
931 Rents	OM931	PTT	-	-	-	-	-	-	-
932 Maintenance of General Plant	OM932	PT389	197,811	17,060	-	65,824	-	-	2,713
Total Administrative and General Expense	OMAGT		\$ 6,720,678	\$ 278,786	\$ 292,892	\$ 1,834,526	\$ 204,674	\$ 20,928	\$ 78,280
Total Operation & Maintenance Expense	OMT		\$ 13,324,781	\$ 454,596	\$ 1,373,171	\$ 3,241,491	\$ 457,936	\$ 104,971	\$ 146,405



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Operation &amp; Maintenance Expenses (Continued)</b>								
<b>Administrative &amp; General</b>								
920	Admin and General Salaries	LBSUB	306,232	615,876	176,466	241,250	331,340	-
921	Office Supplies and Expense	LBSUB	63,976	128,664	36,866	50,400	69,221	-
922	Admin. Expenses Transferred	LBSUB	(386,103)	(776,507)	(222,492)	(304,172)	(417,759)	-
923	Outside Services Employed	OMSUB	109,867	220,958	62,502	89,942	97,454	236
924	Property Insurance	PTT	106,193	213,568	65,582	84,414	-	-
925	Injures and Damages	PTT	-	-	-	-	-	-
926	Employee Pensions and Benefits	LBSUB	463,562	932,289	267,128	365,195	501,569	-
927	Franchise Requirement	PTT	-	-	-	-	-	-
928	Regulatory Commission Fee	PTT	23,779	47,823	14,685	18,902	-	-
929	Duplicate Charges -Credit	PTT	-	-	-	-	-	-
930.1	General Advertising Expense	PTT	-	-	-	-	-	-
930.2	Misc. General Expense	OMSUB	56,634	113,899	32,218	46,363	50,235	122
931	Rents	PTT	-	-	-	-	-	-
932	Maintenance of General Plant	PT389	25,371	51,025	15,661	20,157	-	-
	Total Administrative and General Expense	OMAGT	\$ 769,511	\$ 1,547,594	\$ 448,617	\$ 612,451	\$ 632,060	\$ 358
	Total Operation & Maintenance Expense	OMT	\$ 1,438,144	\$ 2,892,310	\$ 828,992	\$ 1,159,822	\$ 1,225,149	\$ 1,796

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<u>Depreciation Expenses</u>									
Underground Storage									
350-357 Underground Storage Plant	DP350	F003	\$ 283,733	283,733	-	-	-	-	-
Transmission									
365-371 Transmission Plant	DP365	F005	\$ 1,232,318	-	-	1,232,318	-	-	-
Distribution									
374 Land & Land Rights	DP374	F008	\$ -	-	-	-	-	-	-
375 Structures & Improvements	DP375	F008	\$ 3,000	-	-	-	-	-	3,000
376 Mains	DP376	F009	\$ 926,374	-	-	-	-	-	-
378 Meas & Reg Station Eq.-Gen	DP378	F008	\$ 45,914	-	-	-	-	-	45,914
379 Meas & Reg Station Eq.-City Gate	DP379	F008	\$ 14,674	-	-	-	-	-	14,674
380 Services	DP380	F010	\$ 191,190	-	-	-	-	-	-
381 Meters	DP381	F011	\$ 211,954	-	-	-	-	-	-
382 Meter Installations	DP382	F011	\$ 74,194	-	-	-	-	-	-
383 House Regulators	DP383	F011	\$ 130,944	-	-	-	-	-	-
384 House Regulator Installations	DP384	F011	\$ -	-	-	-	-	-	-
385 Industrial Meas & Reg Equipment	DP385	F011	\$ 36,370	-	-	-	-	-	-
387 Other Equipment	DP387	F011	\$ -	-	-	-	-	-	-
Other	PTSUB		\$ -	-	-	-	-	-	-
Total Distribution			\$ 1,634,615	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 63,588
117 Gas Stored Underground	DP117	F003	\$ -	-	-	-	-	-	-
301-303 Intangible Plant	DP301	PTSUB	\$ -	-	-	-	-	-	-
389-399 General Plant	DP389	PTSUB	\$ 651,391	56,179	-	216,758	-	-	8,935
Common Utility Plant	DPCP	PTSUB	\$ -	-	-	-	-	-	-
Amortization of Gas Plant	AMORT	PTSUB	\$ (19,800)	(1,708)	-	(6,589)	-	-	(272)
Accrion Expense	ACCRN	PTSUB	\$ -	-	-	-	-	-	-
Total Depreciation Expense	DEPREX		\$ 3,792,258	\$ 348,204	\$ -	\$ 1,442,487	\$ -	\$ -	\$ 72,251

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains		Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
			Demand	Customer					
<b>Depreciation Expenses</b>									
<b>Underground Storage</b>									
350-357	Underground Storage Plant	F003	-	-	-	-	-	-	-
<b>Transmission</b>									
365-371	Transmission Plant	F005	-	-	-	-	-	-	-
<b>Distribution</b>									
374	Land & Land Rights	F008	-	-	-	-	-	-	-
375	Structures & Improvements	F008	-	-	-	-	-	-	-
376	Mains	F009	-	-	-	-	-	-	-
378	Meas & Reg Station Eq.-Gen	F008	307,649	618,725	-	-	-	-	-
379	Meas & Reg Station Eq.-City Gate	F008	-	-	-	-	-	-	-
380	Services	F010	-	-	191,190	-	-	-	-
381	Meters	F011	-	-	-	211,954	-	-	-
382	Meter Installations	F011	-	-	-	74,194	-	-	-
383	House Regulators	F011	-	-	-	130,944	-	-	-
384	House Regulator Installations	F011	-	-	-	-	-	-	-
385	Industrial Meas & Reg Equipment	F011	-	-	-	36,370	-	-	-
387	Other Equipment	F011	-	-	-	-	-	-	-
	Other	PTSUB	-	-	-	-	-	-	-
Total Distribution			\$ 307,649	\$ 618,725	\$ 191,190	\$ 453,463	\$ -	\$ -	\$ -
<b>Gas Stored Underground</b>									
117	Gas Stored Underground	F003	-	-	-	-	-	-	-
301-303	Intangible Plant	PTSUB	-	-	-	-	-	-	-
389-399	General Plant	PTSUB	83,547	168,024	51,570	66,378	-	-	-
Common Utility Plant	DPCP	PTSUB	-	-	-	-	-	-	-
Amortization of Gas Plant	AMORT	PTSUB	(2,540)	(5,107)	(1,568)	(2,018)	-	-	-
Accretion Expense	ACCRTN	PTSUB	-	-	-	-	-	-	-
Total Depreciation Expense	DEPREX		\$ 388,656	\$ 781,642	\$ 241,193	\$ 517,824	\$ -	\$ -	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Taxes Other Than Income Taxes</b>									
License & Privilege Fee	OTRE	PTT	7,382	779	-	2,407	-	-	99
Property Taxes	OTPP	PTT	1,320,467	139,342	-	430,456	-	-	17,729
Payroll Taxes	OTUN	LBTOT	577,030	16,315	3,587	162,286	21,265	-	6,712
Total Taxes Other Than Income Taxes	OTT		\$ 1,904,879	\$ 156,435	\$ 3,587	\$ 595,148	\$ 21,265	\$ -	\$ 24,540
<b>Interest on Long Term Debt</b>									
	INT	PTT	\$ 4,075,601	430,076	-	1,328,596	-	-	54,720



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Taxes Other Than Income Taxes</b>								
License & Privilege Fee	OTRE	PTT	926	1,863	572	736	-	-
Property Taxes	OTPP	PTT	165,687	333,221	102,325	131,707	-	-
Payroll Taxes	OTUN	LBTOT	67,226	135,202	38,739	52,961	72,738	-
Total Taxes Other Than Income Taxes	OTT	\$	233,840 \$	470,285 \$	141,636 \$	185,405 \$	72,738 \$	-
<b>Interest on Long Term Debt</b>								
	INT	PTT	511,391	1,028,480	315,825	406,513	-	-

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Functional Assignment Vectors</b>									
Gas Supply Demand	F001		1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Gas Supply Commodity	F002		1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Storage Demand	F003		1.000000	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Storage Commodity	F004		1.000000	0.000000	1.000000	0.000000	0.000000	0.000000	0.000000
Transmission Demand	F005		1.000000	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000
Transmission Commodity	F006		1.000000	0.000000	0.000000	0.000000	1.000000	0.000000	0.000000
Distribution Expense Commodity	F007		1.000000	0.000000	0.000000	0.000000	0.000000	1.000000	0.000000
Distribution Structures & Equipment	F008		1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000
Distribution Mains	F009		1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Services	F010		1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Meters	F011		1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Customer Accounts	F012		1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Customer Service Expense	F013		1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Transmission & Distribution Mains	TDMSUB		\$ 124,496,316	\$ -	\$ -	\$ 57,620,977	\$ -	\$ -	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<u>Functional Assignment Vectors</u>								
Gas Supply Demand	F001		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Gas Supply Commodity	F002		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Storage Demand	F003		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Storage Commodity	F004		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Transmission Demand	F005		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Transmission Commodity	F006		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Distribution Expense Commodity	F007		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Distribution Structures & Equipment	F008		0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Distribution Mains	F009		0.332100	0.667900	0.000000	0.000000	0.000000	0.000000
Services	F010		0.000000	0.000000	1.000000	0.000000	0.000000	0.000000
Meters	F011		0.000000	0.000000	0.000000	1.000000	0.000000	0.000000
Customer Accounts	F012		0.000000	0.000000	0.000000	0.000000	1.000000	0.000000
Customer Service Expense	F013		0.000000	0.000000	0.000000	0.000000	0.000000	1.000000
Transmission & Distribution Mains	TDMSUB	\$	22,209,300 \$	44,666,039 \$	- \$	- \$	- \$	- \$

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Total Company	Storage Demand	Storage Commodity	Transmission Demand	Transmission Commodity	Distribution Commodity	Distribution Structures & Equipment Demand
<b>Internally Generated Functional Vectors</b>									
Sub-Total Distribution Plant		PTDSUB	1,000,000	-	-	0.332761	-	-	0.023609
Storage-Transmission-Distribution Subtotal		PTST	1,000,000	0.086244	-	0.332761	-	-	0.013717
Total Storage Plant		PT365	1,000,000	1,000,000	-	-	-	-	-
Transmission Plant		PT389	1,000,000	-	-	1,000,000	-	-	-
General Plant		PTDSUB	1,000,000	0.086244	-	0.332761	-	-	0.013717
Total Distribution Plant		CWIP	1,000,000	0.075939	-	0.434755	-	-	0.023609
Sub-Total CWIP		DEPR	1,000,000	0.086267	-	0.342843	-	-	0.013367
Total Depreciation Reserve		PTDSUB	1,000,000	0.086244	-	0.332761	-	-	0.013478
Storage-Transmission - Distribution Plant Subtotal		LBTD	1,000,000	-	-	0.335030	0.043901	-	0.013717
Transmission and Distribution Payroll		TDMSUB	1,000,000	-	-	0.462833	-	-	0.013856
Transmission and Distribution Mains	OSE		117,698	97,523	20,175	-	-	-	-
Storage Operation Expenses Subtotal	MSE		2,534	1,040	1,494	-	-	-	-
Storage Maintenance Expenses Subtotal	CADAL		80,584,347	-	-	-	-	-	-
Mains & Services	DMCM		1,000,000	-	-	-	-	-	-
Demand/Commodity Percent of Purchased Gas Cost	DOES		105,679	-	-	-	-	-	135
Distribution Operation Expenses Subtotal	DMES		3,486,069	98,563	21,669	980,432	128,472	-	40,549
Distribution Maintenance Expenses Subtotal	LBSUB		6,604,104	175,810	1,080,278	1,406,965	253,262	84,043	68,125
Subtotal Labor Expenses	OMSUB								
Subtotal O&M Expenses									



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Functional Assignment and Classification

Description	Name	Vector	Distribution Mains Demand	Distribution Mains Customer	Services Customer	Meters Customer	Customer Accounts Customer	Customer Service Expense Customer
<b>Internally Generated Functional Vectors</b>								
Sub-Total Distribution Plant		PTDSUB	0.220757	0.443974	0.136266	0.175393	-	-
Storage-Transmission-Distribution Subtotal		PTSUB	0.128259	0.257946	0.079170	0.101903	-	-
Total Storage Plant		PTST	-	-	-	-	-	-
Transmission Plant		PT365	-	-	-	-	-	-
General Plant		PT389	0.128259	0.257946	0.079170	0.101903	-	-
Total Distribution Plant		PTDSUB	0.220757	0.443974	0.136266	0.175393	-	-
Sub-Total CWIP		CWIP	0.099459	0.200026	0.077151	0.099304	-	-
Total Depreciation Reserve		DEPR	0.126028	0.253461	0.077793	0.100130	-	-
Storage-Transmission -Distribution Plant Subtotal		PTSUB	0.128259	0.257946	0.079170	0.101903	-	-
Transmission and Distribution Payroll		LBTD	0.138785	0.279117	0.079975	0.109335	-	-
Transmission and Distribution Mains		TDSUB	0.178393	0.358774	-	-	-	-
Storage Operation Expenses Subtotal			-	-	-	-	-	-
Storage Maintenance Expenses Subtotal			-	-	-	-	-	-
Mains & Services			22,209,300	44,666,039	13,709,009	-	-	-
CADAL			-	-	-	-	-	-
Demand/Commodity Percent of Purchased Gas Cost			-	-	-	-	-	-
DMCM			-	-	-	-	-	-
DOES			28,245	56,805	777	19,717	-	-
Distribution Operation Expenses Subtotal			406,141	816,805	234,039	319,958	439,440	-
DMES			668,633	1,344,715	380,376	547,371	593,089	1,438
Distribution Maintenance Expenses Subtotal			-	-	-	-	-	-
Subtotal Labor Expenses			-	-	-	-	-	-
LBSUB			-	-	-	-	-	-
Subtotal O&M Expenses			-	-	-	-	-	-
OMSUB			-	-	-	-	-	-



## **Seelye Exhibit 6**

Class Cost of Service Study

Allocation of Costs by  
Rate Class

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Plant in Service (Continued)</b>										
<b>Distribution Mains</b>										
Demand Customer	PTIS	PTISDMD	DEM05	24,940,653 \$	11,308,407 \$	3,718,577 \$	8,103,281 \$	1,722,368 \$	88,020 \$	-
Total Distribution Mains	PTIS	PTISDMC	CUST01	50,159,175 \$	42,800,385 \$	5,963,396 \$	1,337,078 \$	56,926 \$	1,388 \$	-
				75,099,828 \$	54,108,792 \$	9,681,973 \$	9,440,359 \$	1,779,295 \$	89,409 \$	-
Services Customer	PTIS	PTISSC	CUST02	15,394,975 \$	12,679,380 \$	1,646,099 \$	1,022,766 \$	43,545 \$	3,186 \$	-
Meters Customer	PTIS	PTISMC	CUST03	19,815,542 \$	13,355,472 \$	2,990,345 \$	3,046,528 \$	378,581 \$	44,616 \$	-
Customer Accounts Customer	PTIS	PTISCAC	CUST04	- \$	- \$	- \$	- \$	- \$	- \$	-
Customer Service Customer	PTIS	PTISCSC	CUST05	- \$	- \$	- \$	- \$	- \$	- \$	-
Total		PLT		198,663,799 \$	108,094,752 \$	23,520,966 \$	34,112,662 \$	4,940,043 \$	4,498,739 \$	21,496,637



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Rate Base</b>										
Gas Supply Costs										
Demand	NCRB	RBGSD	DEM01	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Commodity	NCRB	RBGSC	COM01	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Procurement Expenses				\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Storage										
Demand	NCRB	RBSD	DEM02	\$ 16,737,875	\$ 7,954,835	\$ 2,624,831	\$ 6,158,209	\$ -	\$ -	\$ -
Commodity	NCRB	RBSC	COM02	\$ 170,895	\$ 77,028	\$ 26,273	\$ 67,594	\$ -	\$ -	\$ -
Total Storage				\$ 16,908,770	\$ 8,031,863	\$ 2,651,104	\$ 6,225,803	\$ -	\$ -	\$ -
Transmission										
Demand	NCRB	RBTD	TDEM	\$ 33,323,606	\$ 8,637,065	\$ 2,840,151	\$ 6,185,074	\$ 1,315,500	\$ 2,241,394	\$ 12,100,523
Commodity	NCRB	RBTC	COM03	\$ 56,991	\$ 5,294	\$ 1,775	\$ 6,103	\$ 3,445	\$ 6,266	\$ 34,109
Total Transmission				\$ 33,380,598	\$ 8,642,359	\$ 2,841,926	\$ 6,195,177	\$ 1,318,945	\$ 2,247,559	\$ 12,134,632
Distribution Expenses										
Commodity	NCRB	RBDEC	COM04	\$ 13,064	\$ 4,115	\$ 1,380	\$ 4,744	\$ 2,678	\$ 147	\$ -
Distribution Structures & Equipment										
Demand	NCRB	RBDS	DEM04	\$ 1,419,548	\$ 643,641	\$ 211,650	\$ 461,215	\$ 98,032	\$ 5,010	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Rate Base (Continued)</b>										
<b>Distribution Mains</b>										
Demand Customer	NCRB	RBDMD	DEM05	13,254,121 \$	6,009,586 \$	1,976,150 \$	4,306,297 \$	915,312 \$	46,776 \$	-
Total Distribution Mains	NCRB	RBDMC	CUST01	26,655,910 \$	22,745,255 \$	3,169,106 \$	710,559 \$	30,252 \$	738 \$	-
				39,910,031 \$	38,754,841 \$	5,145,256 \$	5,016,856 \$	945,564 \$	47,514 \$	-
Services Customer	NCRB	RBSC	CUST02	8,181,893 \$	6,758,649 \$	874,844 \$	543,564 \$	23,142 \$	1,693 \$	-
Meters Customer	NCRB	RBMC	CUST03	10,554,775 \$	7,113,810 \$	1,592,811 \$	1,622,737 \$	201,652 \$	23,765 \$	-
Customer Accounts Customer	NCRB	RBCAC	CUST04	152,473 \$	119,847 \$	16,547 \$	14,954 \$	594 \$	63 \$	469
Customer Service Customer	NCRB	RBCSC	CUST05	224 \$	191 \$	26 \$	6 \$	0 \$	0 \$	-
Total		RBT		110,521,375 \$	60,049,315 \$	13,335,545 \$	20,085,056 \$	2,590,607 \$	2,325,751 \$	12,135,101

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Operation and Maintenance Expenses</b>										
<b>Gas Supply Costs</b>										
Demand	OMT	OMGSD	DEM01	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Commodity	OMT	OMGSC	COM01	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Procurement Expenses		OMGST		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Storage</b>										
Demand	OMT	OMSD	DEM02	\$ 454,596	\$ 216,051	\$ 71,290	\$ 167,255	\$ -	\$ -	\$ -
Commodity	OMT	OMSC	COM02	\$ 1,373,171	\$ 618,932	\$ 211,108	\$ 543,131	\$ -	\$ -	\$ -
Total Storage		OMST		\$ 1,827,766	\$ 834,983	\$ 282,397	\$ 710,386	\$ -	\$ -	\$ -
<b>Transmission</b>										
Demand	OMT	OMTD	TDEM	\$ 3,241,491	\$ 840,154	\$ 276,270	\$ 602,030	\$ 127,963	\$ 218,018	\$ 1,177,055
Commodity	OMT	OMTC	COM03	\$ 457,936	\$ 42,536	\$ 14,261	\$ 49,041	\$ 27,679	\$ 50,345	\$ 274,074
Total Transmission		OMTRT		\$ 3,699,427	\$ 882,690	\$ 290,531	\$ 651,071	\$ 155,642	\$ 268,362	\$ 1,451,129
<b>Distribution Expenses</b>										
Commodity	OMT	OMDEC	COM04	\$ 104,971	\$ 33,064	\$ 11,085	\$ 38,121	\$ 21,516	\$ 1,184	\$ -
<b>Distribution Structures &amp; Equipment Demand</b>										
Demand	OMT	OMDSD	DEM04	\$ 146,405	\$ 66,382	\$ 21,829	\$ 47,567	\$ 10,111	\$ 517	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Operation and Maintenance Expenses (Continued)</b>										
<b>Distribution Mains</b>										
Demand Customer	OMT	OMDMD	DEM05	1,438,144 \$	652,072 \$	214,423 \$	467,256 \$	99,316 \$	5,075 \$	-
Total Distribution Mains	OMT	OMDMC	CUST01	2,892,310 \$	2,467,983 \$	343,865 \$	77,099 \$	3,283 \$	80 \$	-
				4,330,453 \$	3,120,055 \$	558,288 \$	544,356 \$	102,599 \$	5,156 \$	-
<b>Services</b>										
Customer	OMT	OMSC	CUST02	828,992 \$	682,762 \$	88,640 \$	55,074 \$	2,345 \$	172 \$	-
<b>Meters</b>										
Customer	OMT	OMMC	CUST03	1,159,822 \$	781,708 \$	175,028 \$	178,316 \$	22,159 \$	2,611 \$	-
<b>Customer Accounts</b>										
Customer	OMT	OMCAC	CUST04	1,225,149 \$	962,994 \$	132,961 \$	120,155 \$	4,771 \$	502 \$	3,767
<b>Customer Service</b>										
Customer	OMT	OMCSC	CUST05	1,796 \$	1,534 \$	212 \$	48 \$	2 \$	0 \$	-
Total		OMTT		13,324,781 \$	7,366,173 \$	1,560,971 \$	2,345,094 \$	319,144 \$	278,504 \$	1,454,896



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off-Sys Trans
<u>Pavroll Expenses</u>										
<u>Distribution Mains</u>										
Demand	LBTOT	LBDMD	DEMO5	\$ 817,831	\$ 370,815	\$ 121,936	\$ 265,715	\$ 56,478	\$ 2,886	\$ -
Customer	LBTOT	LBDMC	CUST01	\$ 1,644,773	\$ 1,403,470	\$ 195,546	\$ 43,844	\$ 1,867	\$ 46	\$ -
Total Distribution Mains				\$ 2,462,604	\$ 1,774,285	\$ 317,482	\$ 309,559	\$ 58,345	\$ 2,932	\$ -
<u>Services</u>										
Customer	LBTOT	LBSC	CUST02	\$ 471,275	\$ 388,144	\$ 50,391	\$ 31,309	\$ 1,333	\$ 98	\$ -
<u>Meters</u>										
Customer	LBTOT	LBMC	CUST03	\$ 644,288	\$ 434,244	\$ 97,229	\$ 99,056	\$ 12,309	\$ 1,451	\$ -
<u>Customer Accounts</u>										
Customer	LBTOT	LBCAC	CUST04	\$ 884,884	\$ 695,538	\$ 96,033	\$ 86,784	\$ 3,446	\$ 363	\$ 2,720
<u>Customer Service</u>										
Customer	LBTOT	LBCSC	CUST05	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total		LBTT		\$ 7,019,771	\$ 3,978,961	\$ 787,464	\$ 1,037,895	\$ 174,646	\$ 166,358	\$ 874,448

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	OT/Sys Trans
<u>Depreciation Expenses</u>										
Gas Supply Costs										
Demand	DEPREX	DEGSD	DEM01	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Commodity	DEPREX	DEGSC	COM01	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Procurement Expenses		DEGST		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Storage										
Demand	DEPREX	DESD	DEM02	\$ 348,204	\$ 165,487	\$ 54,605	\$ 128,111	\$ -	\$ -	\$ -
Commodity	DEPREX	DESC	COM02	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Storage		DEST		\$ 348,204	\$ 165,487	\$ 54,605	\$ 128,111	\$ -	\$ -	\$ -
Transmission										
Demand	DEPREX	DETD	TDEM	\$ 1,442,487	\$ 373,875	\$ 122,942	\$ 267,908	\$ 56,944	\$ 97,019	\$ 523,798
Commodity	DEPREX	DETC	COM03	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Transmission		DETT		\$ 1,442,487	\$ 373,875	\$ 122,942	\$ 267,908	\$ 56,944	\$ 97,019	\$ 523,798
Distribution Expenses										
Commodity	DEPREX	DEDEC	COM04	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Distribution Structures & Equipment										
Demand	DEPREX	DESDS	DEM04	\$ 72,251	\$ 32,760	\$ 10,772	\$ 23,475	\$ 4,990	\$ 255	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Depreciation Expenses (Continued)</b>										
<b>Distribution Mains</b>										
Demand	DEPREX	DEDM	DEM05	388,656 \$	176,221 \$	57,947 \$	126,275 \$	26,840 \$	1,372 \$	-
Customer	DEPREX	DEDMC	CUST01	781,642 \$	666,968 \$	92,929 \$	20,836 \$	887 \$	22 \$	-
Total Distribution Mains				1,170,298 \$	843,190 \$	150,876 \$	147,111 \$	27,727 \$	1,393 \$	-
Services Customer	DEPREX	DESC	CUST02	241,193 \$	198,648 \$	25,789 \$	16,024 \$	682 \$	50 \$	-
Meters Customer	DEPREX	DEMC	CUST03	517,824 \$	349,008 \$	78,144 \$	79,612 \$	9,893 \$	1,166 \$	-
Customer Accounts Customer	DEPREX	DECAC	CUST04	- \$	- \$	- \$	- \$	- \$	- \$	-
Customer Service Customer	DEPREX	DECSC	CUST05	- \$	- \$	- \$	- \$	- \$	- \$	-
Total		DET		3,792,258 \$	1,962,967 \$	443,130 \$	662,242 \$	100,236 \$	99,884 \$	523,798

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off-Sys Trans
<u>Other Taxes</u>										
Gas Supply Costs										
Demand	OTT	OTTGSD	DEM01	- \$	- \$	- \$	- \$	- \$	- \$	- \$
Commodity	OTT	OTTGSC	COM01	- \$	- \$	- \$	- \$	- \$	- \$	- \$
Total Procurement Expenses		OTTGST		- \$	- \$	- \$	- \$	- \$	- \$	- \$
Storage										
Demand	OTT	OTTSD	DEM02	156,435 \$	74,347 \$	24,532 \$	57,556 \$	- \$	- \$	- \$
Commodity	OTT	OTTSC	COM02	3,587 \$	1,617 \$	551 \$	1,419 \$	- \$	- \$	- \$
Total Storage		OTTST		160,022 \$	75,964 \$	25,084 \$	58,974 \$	- \$	- \$	- \$
Transmission										
Demand	OTT	OTTTD	TDEM	595,148 \$	154,255 \$	50,724 \$	110,535 \$	23,494 \$	40,029 \$	216,111
Commodity	OTT	OTTTC	COM03	21,265 \$	1,975 \$	662 \$	2,277 \$	1,285 \$	2,338 \$	12,727
Total Transmission		OTTTT		616,413 \$	156,230 \$	51,386 \$	112,812 \$	24,780 \$	42,367 \$	228,838
Distribution Expenses										
Commodity	OTT	OTTDEC	COM04	- \$	- \$	- \$	- \$	- \$	- \$	- \$
Distribution Structures & Equipment										
Demand	OTT	OTTDSD	DEM04	24,540 \$	11,127 \$	3,659 \$	7,973 \$	1,695 \$	87 \$	- \$

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Other Taxes (Continued)</b>										
Distribution Mains										
Demand Customer	OTT	OTTDMC	DEM05	233,840 \$	106,026 \$	34,865 \$	75,975 \$	16,149 \$	825 \$	-
Total Distribution Mains	OTT	OTTDMC	CUST01	470,285 \$	401,290 \$	55,912 \$	12,536 \$	534 \$	13 \$	-
				704,125 \$	507,316 \$	90,777 \$	88,511 \$	16,682 \$	838 \$	-
Services Customer	OTT	OTTSC	CUST02	141,656 \$	116,653 \$	15,144 \$	9,410 \$	401 \$	29 \$	-
Meters Customer	OTT	OTTMC	CUST03	185,405 \$	124,961 \$	27,979 \$	28,505 \$	3,542 \$	417 \$	-
Customer Accounts Customer	OTT	OTTCAC	CUST04	72,738 \$	57,174 \$	7,894 \$	7,134 \$	283 \$	30 \$	224
Customer Service Customer	OTT	OTTCSC	CUST05	- \$	- \$	- \$	- \$	- \$	- \$	-
Total		OTTT		1,904,879 \$	1,049,424 \$	221,923 \$	313,319 \$	47,383 \$	43,768 \$	229,062



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Interest Expense</b>										
<b>Gas Supply Costs</b>										
Demand	INT	INTGSD	DEM01	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Commodity	INT	INTGSC	COM01	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Procurement Expenses		INTGST		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Storage</b>										
Demand	INT	INTSD	DEM02	\$ 430,076	\$ 204,398	\$ 67,445	\$ 158,234	\$ -	\$ -	\$ -
Commodity	INT	INTSC	COM02	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Storage		INTST		\$ 430,076	\$ 204,398	\$ 67,445	\$ 158,234	\$ -	\$ -	\$ -
<b>Transmission</b>										
Demand	INT	INTTD	DEM03	\$ 1,328,596	\$ 344,355	\$ 113,235	\$ 246,755	\$ 52,448	\$ 89,359	\$ 482,442
Commodity	INT	INTTC	COM03	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Transmission		INTTT		\$ 1,328,596	\$ 344,355	\$ 113,235	\$ 246,755	\$ 52,448	\$ 89,359	\$ 482,442
<b>Distribution Expenses</b>										
Commodity	INT	INTDEC	COM04	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Distribution Structures &amp; Equipment</b>										
Demand	INT	INTDSD	DEM04	\$ 54,720	\$ 24,811	\$ 8,159	\$ 17,779	\$ 3,779	\$ 193	\$ -

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off-Sys Trans
<u>Interest Expense (Continued)</u>										
Distribution Mains										
Demand Customer	INT	INTDMD	DEM05	511,391 \$	231,871 \$	76,247 \$	166,152 \$	35,316 \$	1,805 \$	-
Total Distribution Mains	INT	INTDMC	CUST01	1,028,480 \$	877,593 \$	122,275 \$	27,416 \$	1,167 \$	28 \$	-
				1,539,871 \$	1,109,464 \$	198,522 \$	193,568 \$	36,483 \$	1,833 \$	-
Services Customer	INT	INTSC	CUST02	315,825 \$	260,115 \$	33,769 \$	20,982 \$	893 \$	65 \$	-
Meters Customer	INT	INTMC	CUST03	406,513 \$	273,985 \$	61,346 \$	62,499 \$	7,767 \$	915 \$	-
Customer Accounts Customer	INT	INTCAC	CUST04	- \$	- \$	- \$	- \$	- \$	- \$	-
Customer Service Customer	INT	INTCSC	CUST05	- \$	- \$	- \$	- \$	- \$	- \$	-
Total		INTT		4,075,601 \$	2,217,129 \$	482,477 \$	699,817 \$	101,370 \$	92,366 \$	-482,442

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Allocation Vector	Name	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Net Operating Income – Adjusted Test Period</b>										
<b>Operating Revenues</b>										
Sales and Transportation			REVUC	27,769,025	12,622,626	3,598,374	6,338,627	1,484,067	309,428	3,415,904
Collection Fees		\$	COLL	177,360	157,980	1,641	17,740	-	-	-
Reconnect Revenue		\$	RCNCT	111,420	92,100	1,680	17,640	-	-	-
Bad Check Revenue		\$	BDCK	13,800	11,895	225	1,680	-	-	-
Total Operating Revenues – Per Books		\$	TOR	28,071,605	12,884,600	3,601,920	6,375,687	1,484,067	309,428	3,415,904
<b>Pro-Forma Adjustments to Revenues</b>										
Temperature normalization		\$	REVADJ1	(63,111)	(57,963)	(13,206)	8,004	53	-	-
Total Revenue Adjustments		\$		(63,111)	(57,963)	(13,206)	8,004	53	-	-
Total Adjusted Revenue		\$		28,008,494	12,826,638	3,588,714	6,383,691	1,484,120	309,428	3,415,904
<b>Expenses</b>										
Operation and Maintenance Expenses		\$		13,324,781	7,366,173	1,560,971	2,345,094	319,144	278,504	1,454,896
Depreciation and Amortization Expenses		\$		3,792,258	1,962,967	443,130	662,242	100,236	99,884	523,798
Other Taxes		\$		1,904,879	1,049,424	221,923	313,319	47,363	43,768	229,062
Total Operating Expenses		\$	TOE	19,021,918	10,378,564	2,226,024	3,320,655	466,763	422,156	2,207,756

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Net Operating Income -- Adjusted Test Period (Cont.)</b>										
<b>Pro-Forma Adjustments to Expenses</b>										
Labor Adjustment		EXADJ1	LBTT	\$ (41,046)	(23,266)	(4,604)	(6,069)	(1,021)	(973)	(5,113)
Eliminate Advertising Expenses		EXADJ2	OTTT	(1,438)	(792)	(168)	(237)	(36)	(33)	(173)
Lobbying Expense		EXADJ3	OTTT	(19,194)	(10,574)	(2,236)	(3,157)	(477)	(441)	(2,308)
Community Relations		EXADJ4	OTTT	(26,450)	(14,572)	(3,081)	(4,351)	(658)	(608)	(3,181)
Marketing		EXADJ5	OMTT	(1,944)	(1,075)	(228)	(342)	(47)	(41)	(212)
Rate Case Expenses		EXADJ6	OMTT	(10,948)	(6,052)	(1,283)	(1,927)	(262)	(229)	(1,195)
Depreciation Expenses		EXADJ7	DET	1,311,714	678,976	153,275	229,064	34,671	34,549	181,178
Bad Debt Expenses		EXADJ8	BDCK	330,983	285,303	5,395	40,295	-	-	-
Conservation		EXADJ9	REVUC	(600)	(273)	(78)	(137)	(32)	(7)	(74)
Property Tax		EXADJ10	OTTT	67,835	37,371	7,903	11,158	1,687	1,559	8,157
		ADJTOT	INTT	-	-	-	-	-	-	-
Total Expense Adjustments				\$ 1,608,922	\$ 945,046	\$ 154,896	\$ 264,298	\$ 33,825	\$ 33,777	\$ 177,079
Net Income Before Income Taxes				\$ 7,377,653	\$ 1,503,027	\$ 1,207,794	\$ 2,798,738	\$ 983,531	\$ (146,505)	\$ 1,031,069
Income Taxes			TXINC	\$ 2,081,177	(565,631)	472,454	1,393,200	592,741	(164,901)	353,314
Net Operating Income (Adjusted)		TOM		\$ 5,296,476	\$ 2,068,658	\$ 735,340	\$ 1,405,538	\$ 390,791	\$ 18,395	\$ 677,755
Net Cost Rate Base				\$ 110,521,375	\$ 60,049,315	\$ 13,335,545	\$ 20,085,056	\$ 2,590,607	\$ 2,325,751	\$ 12,135,101
Rate of Return -- Actual				4.79%	3.44%	5.51%	7.00%	15.08%	0.79%	5.59%

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Net Operating Income -- Adjusted For Increase</b>										
Test Year Operating Income				\$ 5,296,476	\$ 2,068,658	\$ 735,340	\$ 1,405,538	\$ 390,791	\$ 18,395	\$ 677,755
Proposed Increase				\$ 5,315,428	\$ 3,541,111	\$ 611,533	\$ 909,754	\$ -	\$ -	\$ 253,030
Increase To Misc Revenue		RCNCT		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Increase		CLSINC		\$ 5,315,428	\$ 3,541,111	\$ 611,533	\$ 909,754	\$ -	\$ -	\$ 253,030
Incremental Income Taxes (@39.44445)		CLSINC		\$ 1,036,917	\$ 690,789	\$ 119,296	\$ 177,472	\$ -	\$ -	\$ 49,360
Net Operating Income Adjusted for Increase				\$ 9,574,987	\$ 4,918,980	\$ 1,227,577	\$ 2,137,820	\$ 390,791	\$ 18,395	\$ 881,425
Net Cost Rate Base				\$ 110,521,375	\$ 60,045,315	\$ 13,335,545	\$ 20,085,056	\$ 2,590,607	\$ 2,325,751	\$ 12,135,101
Rate of Return -- Proposed				8.66%	8.19%	9.21%	10.64%	15.08%	0.79%	7.26%



DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Allocation Factors</b>			\$	3,118,094	38,539					
				3079555						
<b>Commodity</b>		COM01		17,782,734	1,651,781	553,791	1,904,373	1,074,852	1,955,008	10,642,929
Procurement Expenses					0.092887	0.031142	0.107091			
Storage (Dec thru March)		COM02		2,511,065	1,131,817	386,045	993,203			
Transmission		COM03		17,782,734	1,651,781	553,791	1,904,373	1,074,852	1,955,008	10,642,929
Distribution		COM04		5,243,952	1,651,781	553,791	1,904,373	1,074,852	59,155	
<b>Demand</b>		DEM01		80,256	20,813	6,844	14,914	3,170	5,356.19	29,159
Procurement Expenses		DEM02		1,0000	0.4753	0.1568	0.3679		5,356	
Storage					0.4753	0.1568	0.3679			
Transmission		DEM03		80,256	20,813	6,844	14,914	3,170	5,356	29,159
Distribution Structures		DEM04		45,903	20,813	6,844	14,914	3,170	162	
Distribution Mains		DEM05		45,903	20,813	6,844	14,914	3,170	162	
<b>Customer</b>		CUST01		36,126	30,826	4,295	963	41	1	
Distribution Mains (Year-end Customers)		CUST02		28,599,210	23,554,455	3,057,954	1,899,989	80,893	5,919	
Services		CUST03		16,253,935	12,302,965	2,754,684	2,806,440	348,746	41,100	
Meters										
Customer Count (Average)		CUST04		35,915	30,680	4,236	957	38	4	
Customer Accounts		CUST05		39,032	30,680	4,236	3,828	152	16	120
Customer Service				35,915	30,680	4,236	957	38	4	
Forfeited Discounts		REVFD		2,641,717	2,168,773	432,108	9,080	2,703	18,740	9,961

DELTA NATURAL GAS COMPANY

Cost of Service Study  
12 Months Ended December 31, 2009

Class Allocation

Description	Ref	Name	Allocation Vector	Total System	Residential	Small Non-Res	Large Non-Res	Interruptible	Special	Off Sys Trans
<b>Customer Related Unit Cost</b>										
Rate Base			\$	45,545,274 \$	36,717,752 \$	5,653,335 \$	2,891,820 \$	255,640 \$	26,259 \$	469
Rate of Return			\$	8.66%	8.66%	8.66%	8.66%	8.66%	8.66%	8.66%
Return			\$	3,945,802 \$	3,181,032 \$	489,775 \$	250,532 \$	22,147 \$	2,275 \$	41
Income Taxes			\$	858,186 \$	(345,915) \$	200,335 \$	200,699 \$	58,630 \$	(1,867) \$	14
Operation and Maintenance Expenses			\$	6,108,069	4,896,981	740,705	430,692	32,559	3,365	3,767
Depreciation Expenses			\$	1,540,689	1,214,624	196,863	116,472	11,462	1,237	-
Other Taxes			\$	870,064	700,077	106,930	57,584	4,760	490	224
Expense Adjustment (Classified Pro-Rata on the basis of Operating Expenses)			\$	721,347	620,373	72,702	48,166	3,545	410	322
Total Customer-Related Revenue Requirement			\$	14,044,127 \$	10,267,172 \$	1,807,309 \$	1,104,146 \$	133,103 \$	5,910 \$	4,366
Less: Misc Service Revenues			\$	(48,506)	(59,258)	(758)	(2,901)	-	-	-
Net Revenue Requirement			\$	13,995,621 \$	10,207,915 \$	1,806,551 \$	1,101,246 \$	133,103 \$	5,910 \$	4,366
Customer-Months				35,915	30,680	4,236	957	38	4	-
Customer-Related Unit Cost (\$/CustMo)				32.474	27.727	35.540	95.894	291.893	123.130	-



## **Seelye Exhibit 7**

Class Cost of Service Study

Storage Allocation Factor

DELTA NATURAL GAS COMPANY  
**Summary of Allocation of Underground Storage Investment**

**Calculation of Maximum Class Demands  
On February 10th Design Day Assuming 68 Degree Days  
For Determination of Demand Allocation Factors**

	Total	Residential	Small Non Residential GS	Large Non Residential GS
Non-Temp Sensitive Load (per Day)	4,151	821	316	3,014
Temp Sensitive Load (per Degree Day)	565	294	96	175
Calculated Daily Requirements at -3 Degrees	42,571	20,813	6,844	14,914
Percentage of Total		48.89%	16.08%	35.03%

**Allocation of Underground Storage**

	Storage Withdrawals	Residential	Small Non Residential GS	Large Non Residential GS
Total Allocated Withdrawals Thru February 9th				
December	459,864	208,862	69,286	181,716
January	497,654	229,031	75,860	192,763
Feb. 1-9	154,734	70,673	23,429	60,632
<b>Total</b>	<b>1,112,252</b>	<b>508,566</b>	<b>168,575</b>	<b>435,111</b>
Balance of Working Gas Allocated on the Basis of -3 Degree Feb. 10 Design Day	1,469,337	718,359	236,269	514,709
Total Working Gas	2,581,589	1,226,925	404,844	949,820
Total Allocation Factor For Underground Storage	1.000000	0.475260	0.156820	0.367921



**DELTA NATURAL GAS COMPANY**  
**Allocation of Underground Storage Investment**

(November)

Date	Heating Degree Days	Residential	Requirements				Total	Storage Withdrawals (Injections)	Storage Allocation			
			Small Non Res GS	Large Non Res GS	Small Non Res GS	Large Non Res GS						
			Small Non Res GS	Large Non Res GS	Total			Small Non Res GS	Large Non Res GS	Total		
Non-Temperature Sensitive Load (per Day)		821	316	3,014	4,151							
Temperature Sensitive Load (per Degree Day)		294	96	175	565							
1	14	4,937	1,660	5,464	12,061	0	0	0	0	0	0	
2	14	4,937	1,660	5,464	12,061	0	0	0	0	0	0	
3	14	4,937	1,660	5,464	12,061	0	0	0	0	0	0	
4	14	4,937	1,660	5,464	12,061	0	0	0	0	0	0	
5	15	5,231	1,756	5,639	12,626	0	0	0	0	0	0	
6	15	5,231	1,756	5,639	12,626	0	0	0	0	0	0	
7	15	5,231	1,756	5,639	12,626	0	0	0	0	0	0	
8	15	5,231	1,756	5,639	12,626	0	0	0	0	0	0	
9	16	5,525	1,852	5,814	13,191	0	0	0	0	0	0	
10	16	5,525	1,852	5,814	13,191	0	0	0	0	0	0	
11	17	5,819	1,948	5,989	13,756	0	0	0	0	0	0	
12	17	5,819	1,948	5,989	13,756	0	0	0	0	0	0	
13	18	6,113	2,044	6,164	14,321	0	0	0	0	0	0	
14	18	6,113	2,044	6,164	14,321	0	0	0	0	0	0	
15	19	6,407	2,140	6,339	14,886	0	0	0	0	0	0	
16	19	6,407	2,140	6,339	14,886	0	0	0	0	0	0	
17	20	6,701	2,236	6,514	15,451	0	0	0	0	0	0	
18	20	6,701	2,236	6,514	15,451	0	0	0	0	0	0	
19	20	6,701	2,236	6,514	15,451	0	0	0	0	0	0	
20	21	6,995	2,332	6,689	16,016	0	0	0	0	0	0	
21	21	6,995	2,332	6,689	16,016	0	0	0	0	0	0	
22	21	6,995	2,332	6,689	16,016	0	0	0	0	0	0	
23	22	7,289	2,428	6,864	16,581	0	0	0	0	0	0	
24	22	7,289	2,428	6,864	16,581	0	0	0	0	0	0	
25	22	7,289	2,428	6,864	16,581	0	0	0	0	0	0	
26	22	7,289	2,428	6,864	16,581	0	0	0	0	0	0	
27	23	7,583	2,524	7,039	17,146	0	0	0	0	0	0	
28	23	7,583	2,524	7,039	17,146	0	0	0	0	0	0	
29	24	7,877	2,620	7,214	17,711	0	0	0	0	0	0	
30	24	7,877	2,620	7,214	17,711	0	0	0	0	0	0	
Total	561	189,564	63,336	188,595	441,495	0	0	0	0	0	0	



**DELTA NATURAL GAS COMPANY**  
**Allocation of Underground Storage Investment**

(January)

Date	Heating Degree Days	Requirements				Storage Allocation			
		Residential	Small Non Res GS	Large Non Res GS	Total	Storage Withdrawals (Injections)	Residential	Small Non Res GS	Large Non Res GS
Non-Temperature Sensitive Load (per Day)		821	316	3,014	4,151				
Temperature Sensitive Load (per Degree Day)		294	96	175	565				
1	31	9,935	3,292	8,439	21,666	15,613	7,159	2,372	6,081
2	31	9,935	3,292	8,439	21,666	15,586	7,147	2,368	6,071
3	31	9,935	3,292	8,439	21,666	15,602	7,154	2,371	6,077
4	31	9,935	3,292	8,439	21,666	15,596	7,152	2,370	6,075
5	32	10,229	3,388	8,614	22,231	15,602	7,179	2,378	6,046
6	32	10,229	3,388	8,614	22,231	15,728	7,237	2,397	6,094
7	32	10,229	3,388	8,614	22,231	15,727	7,236	2,397	6,094
8	32	10,229	3,388	8,614	22,231	15,734	7,240	2,398	6,097
9	32	10,229	3,388	8,614	22,231	15,731	7,238	2,397	6,095
10	32	10,229	3,388	8,614	22,231	15,722	7,234	2,396	6,092
11	32	10,229	3,388	8,614	22,231	15,745	7,245	2,400	6,101
12	33	10,523	3,484	8,789	22,796	15,720	7,257	2,403	6,061
13	33	10,523	3,484	8,789	22,796	15,712	7,253	2,401	6,058
14	33	10,523	3,484	8,789	22,796	15,681	7,239	2,397	6,046
15	34	10,817	3,580	8,964	23,361	15,720	7,279	2,409	6,032
16	34	10,817	3,580	8,964	23,361	16,115	7,462	2,470	6,184
17	34	10,817	3,580	8,964	23,361	16,107	7,458	2,468	6,181
18	33	10,523	3,484	8,789	22,796	16,109	7,436	2,462	6,211
19	33	10,523	3,484	8,789	22,796	16,133	7,447	2,466	6,220
20	33	10,523	3,484	8,789	22,796	16,112	7,438	2,463	6,212
21	32	10,229	3,388	8,614	22,231	15,992	7,358	2,437	6,197
22	32	10,229	3,388	8,614	22,231	15,999	7,362	2,438	6,199
23	32	10,229	3,388	8,614	22,231	16,000	7,362	2,438	6,200
24	32	10,229	3,388	8,614	22,231	16,390	7,541	2,498	6,351
25	32	10,229	3,388	8,614	22,231	16,390	7,541	2,498	6,351
26	32	10,229	3,388	8,614	22,231	16,523	7,602	2,518	6,402
27	31	9,935	3,292	8,439	21,666	16,912	7,755	2,570	6,587
28	31	9,935	3,292	8,439	21,666	16,912	7,755	2,570	6,587
29	31	9,935	3,292	8,439	21,666	16,912	7,755	2,570	6,587
30	31	9,935	3,292	8,439	21,666	16,912	7,755	2,570	6,587
31	31	9,935	3,292	8,439	21,666	16,912	7,755	2,570	6,587
Total	995	317,981	105,316	267,559	690,856	497,654	229,031	75,860	192,763

**DELTA NATURAL GAS COMPANY**  
**Allocation of Underground Storage Investment**

(February)

	Residential	Small		Large		Total
		Non Res	GS	Non Res	GS	
Non-Temperature Sensitive Load (per Day)	821	316	3,014	3,014	4,151	
Temperature Sensitive Load (per Degree Day)	294	96	175	175	565	

Date	Heating Degree Days	Requirements				Residential	Total	Withdrawals (Injections)	Storage Allocation			
		Small Non Res	Small GS	Large Non Res	Large GS				Small Non Res	Small GS	Large Non Res	Large GS
1	31		3,292	8,439	9,935	21,666	16,348	7,497	2,484	6,368		
2	30		3,196	8,264	9,641	21,101	16,321	7,457	2,472	6,392		
3	30		3,196	8,264	9,641	21,101	15,952	7,288	2,416	6,247		
4	30		3,196	8,264	9,641	21,101	15,560	7,109	2,357	6,094		
5	30		3,196	8,264	9,641	21,101	15,180	6,936	2,299	5,945		
6	30		3,196	8,264	9,641	21,101	15,306	6,993	2,318	5,994		
7	30		3,196	8,264	9,641	21,101	15,305	6,993	2,318	5,994		
8	30		3,196	8,264	9,641	21,101	14,926	6,820	2,261	5,846		
9	29		3,100	8,089	9,347	20,536	14,923	6,792	2,253	5,878		
10	29		3,100	8,089	9,347	20,536	14,914	6,788	2,251	5,874		
Total	299		31,864	82,465	96,116	210,445	154,734	70,673	23,429	60,632		





## **Seelye Exhibit 8**

Class Cost of Service Study

Zero Intercept Analysis

Delta Natural Gas Company, Inc.

Zero Intercept Analysis  
Account 376 -- Distribution Mains

December 31, 2009

Weighted Linear Regression Statistics

	Estimate	Standard Error
Size Coefficient (\$ per Foot)	1.0559793	0.5323013
Zero Intercept (\$ per Foot)	5.6479737	1.5668682
R-Square	0.9474806	

Plant Classification

Total Number of Units	7,802,022
Zero Intercept	5.6479737
Zero Intercept Cost	\$ 44,065,615
Total Cost of Sample	\$ 65,974,747
Percentage of Total	0.667916396
Percentage Classified as Customer-Related	66.79%
Percentage Classified as Demand-Related	33.21%

Delta Natural Gas Company, Inc.

Zero Intercept Analysis  
 Account 376 -- Distribution Mains

December 31, 2009

Description	Pipe Size	Net Cost of Plant	Quantity (Feet)	Unit Cost (\$ per Foot)
Distribution Main Pipe, Under 2" Plastic	1.500	\$ 4,526,325	511,979	8.84084
Distribution Main Pipe, 2" Plastic	2.000	\$ 35,810,174	4,656,267	7.69075
Distribution Main Pipe, 3" Plastic	3.000	\$ 233,177	89,043	2.61870
Distribution Main Pipe, 4" Plastic	4.000	\$ 17,279,740	1,425,318	12.12343
Distribution Main Pipe, 6" Plastic	6.000	\$ 925,501	59,768	15.48489
Distribution Main Pipe, Under 2" Steel	1.500	\$ 212,739	78,268	2.71808
Distribution Main Pipe, 2" Steel	2.000	\$ 685,650	287,587	2.38415
Distribution Main Pipe, 3" Steel	3.000	\$ 110,787	52,022	2.12962
Distribution Main Pipe, 4" Steel	4.000	\$ 3,093,182	274,404	11.27236
Distribution Main Pipe, 6" Steel	6.000	\$ 2,194,153	272,503	8.05185
Distribution Main Pipe, 8" Steel	8.000	\$ 903,319	94,863	9.52235
Total		\$ 65,974,747.00	7,802,022	



## **Seelye Exhibit 9**

Temperature Normalization  
Adjustment



**Delta Natural Gas Company, Inc.**  
 Natural Gas Temperature Normalization Adjustment  
 For the 12 months Ended December 31, 2009

**Consumption Not Billed under the Weather Normalization Clause**

	Cycle Billing Basis			Calendar Basis			Cycle Billing Basis			Calendar Basis		
	(1) Total Mcf	(2) Non-Temp Mcf	(3) Non-Temp Mcf Full Year (Column (1) x 6)	(4) Temperature Sensitive Mcf	(5) Actual Degree Days	(6) Mcf per Degree Days (Column (4) x (5))	(7) Normal Degree Days	(8) Departure From Normal (Column (7) - (5))	(9) Normal Temperature Adjustment (Column (6) x (8))	(10) Net Revenue Per Mcf Sold	(11) Net Revenue Adjustment (Column (9) x (10))	
Residential *	351,111	49,875	174,562	176,549	863	205	795	(68)	(13,940)	\$ 4,1580	\$ (57,962.52)	
Small Non-Residential General Service *	107,163	18,794	65,780	41,384	863	48	795	(68)	(3,264)	\$ 4,1580	\$ (13,571.71)	
Large Non-Residential GS - Commercial	754,173	43,619	261,715	492,458	4,592	107	4,603	11	1,177	\$ 4,1580	\$ 4,893.97	
Large Non-Residential GS - Industrial	81,222	3,131	18,783	62,439	4,592	14	4,603	11	154	\$ 4,1580	\$ 640.33	
Interruptible Service - Commercial	2,210	-	-	2,210	4,592	0	4,603	11	-	\$ 1,6000	\$ -	
Interruptible Service - Industrial	25,265	1,724	10,342	14,923	4,592	3	4,603	11	33	\$ 1,6000	\$ 52.80	
Small Non Residential General Service -Transportation	37,952	369	2,216	35,736	4,592	8	4,603	11	88	\$ 4,1580	\$ 365.90	
Large Non Residential General Service -Transportation	1,068,708	136,561	819,365	249,343	4,592	54	4,603	11	594	\$ 4,1580	\$ 2,469.85	
Residential - Transportation	1,261	15	89	1,172	4,592	0	4,603	11	-	\$ 4,1580	\$ -	
	2,429,066	254,087	1,352,852	1,076,214					(15,158)	\$	\$ (63,111.38)	

\* For the seven months May to November only



**Seelye Exhibit 10**

Year-End Customer  
Adjustment

Not Proposed

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
	Average Number of Customers	Customers Served at 12/31/09	Year-End Over (Under) Average (Col. 2 - 1)	Customer Charge	Additional Customer Charge Revenue (Col. 3 x 4)	Weather Normalized Mcf	Average Mcf per Customer (COL. 6 / 1)	Year-End Mcf Adjustment (COL. 7 x 3)	Net Revenue per Mcf Commodity	Additional Revenue Commodity (COL. 8 x 9)	Year-End Revenue Adjustment (COL. 5 + 10)
Residential	30,660	30,826	166 \$	15.30 \$	2,539.80	1,857,139	60.6	10,055	\$ 4,1580	\$ 41,808.69	\$ 44,348.49
Small Non-Residential GS	4,233	4,295	62 \$	25.00 \$	1,550.00	605,173	143.0	8,864	\$ 4,1580	\$ 36,856.51	\$ 38,406.51
Large Non-Residential GS - Retail	955	963	8 \$	100.00 \$	800.00	2,253,407	2,359.6	18,877	\$ 4,1580	\$ 49,188.08	\$ 49,988.08
First 200 Mcf						772,185		6,466	\$ 26,885.63		
Next 800 Mcf						431,115		3,612	\$ 2,5091	\$ 9,062.87	
Next 4,000 Mcf						607,467		5,089	\$ 1,7130	\$ 8,717.46	
Next 5,000 Mcf						235,080		1,970	\$ 1,3130	\$ 2,586.61	
Over 10,000 Mcf						207,560		1,739	\$ 1,1130	\$ 1,935.51	
Interruptible	43	41	(2) \$	250.00 \$	(500.00)	1,254,621	29,177.2	(56,354)	\$ (70,531.00)	\$ (71,031.00)	
						326,478		(15,185)	\$ 1,6000	\$ (24,296.00)	
						657,056		(30,561)	\$ 1,2000	\$ (36,673.20)	
						214,604		(9,992)	\$ 0,8000	\$ (7,985.60)	
						56,483		(2,627)	\$ 0,6000	\$ (1,576.20)	
On System Transportation Special	4	4	-	\$ -	-	2,801,367	700,341.8	-	\$ -	\$ -	\$ -
	35,895	36,129	234	\$ 4,389.80	8,771,707	(20,558)	\$ 57,322.28	\$ 61,712.08			19,690

Expenses at an Operating Ratio of - 0.3191  
 ADJUSTMENT TO NET OPERATING INCOME BEFORE TAXES

\$ 42,022

CALCULATION OF GAS OPERATING RATIO

TOTAL GAS OPERATING EXPENSES	51,967,303
LESS GAS SUPPLY EXPENSES	32,945,385
LESS WAGES AND SALARIES	6,907,866
LESS PENSIONS AND BENEFITS	2,989,151
LESS REGULATORY COMMISSION EXPENSE	189,509
NET EXPENSES	<u>8,935,392</u>

TOTAL GAS OPERATIONS REVENUES (AS BILLED)	60,950,552
LESS GSC REVENUE	32,945,718
NET REVENUE	<u>28,004,834</u>

OPERATING RATIO 0.3191





## **Seelye Exhibit 11**

### Depreciation Study

**Delta Natural Gas Company, Inc.**  
**Depreciation Study**  
**December 31, 2009**

**Overview**

The purpose of performing a depreciation study is to insure that the depreciation expenses recorded by the utility and included in the cost of service represent a reasonably accurate and systematic measurement of the annual accrual levels necessary to distribute plant costs, less salvage and removal, over the estimated useful life of the assets.

In performing this study, data was compiled showing plant additions, retirements and transfers going back as far as the 1940s. For certain plant accounts, such as distribution mains (Account 376), meters (Account 381), and house regulators (Account 383), data was available going back well into the 1940s. Many other accounts were not utilized until the 1950s, 1960s or later.

Where sufficient data was available, the average service lives (“ASLs”) were determined by identifying the survivor curve and associated ASL that best fit the pattern of retirements from the historical data provided by Delta Natural Gas Company, Inc. (“Delta”). In general, the survivor curves and ASLs were identified that produced the lowest sum of square deviations between the actual balances and simulated balances.<sup>1</sup> The simulated balances were determined by applying various survivor curves to the plant additions and transfers for each plant account for which data was available and then computing the resultant plant balances. The sum of square deviations were calculated based on the difference between the computed plant balances and actual plant balances. In selecting a survivor curve and ASL, several goodness-of-fit statistics were examined: (1) sum of squared deviations (“SSD”), (2) conformance index (“CI”), (3) index of variation (“IV”), and (4) retirement experience index (“REI”).<sup>2</sup>

Where sufficient data was not available, the ASLs and depreciation accrual rates of neighboring utilities and judgment were used as a guide in developing the proposed depreciation rates.

The survivor curves utilized in this study correspond to the “Iowa” curves that were developed under the direction of Robley Winfrey at Iowa State University, as described in various bulletins and publications.<sup>3</sup> These curves are still widely used within the industry.

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<sup>1</sup> A detailed description of the simulated plant record (“SPR”) method is included in *Public Utility Depreciation Practices*, August 1996, published by the National Association of Regulatory Commissioners (“NARUC”).

<sup>2</sup> *Ibid.*, at pp. 92-97.

<sup>3</sup> See Winfrey, Robley, *Depreciation of Group Properties*, Bulletin 155 (Iowa State University, Engineering Research Institute, reprinted 1969); Winfrey, Robley, *Statistical Analyses of Industrial Property Retirements*, Bulletin 125 (Iowa State University, Engineering Research Institute, revised 1967); Winfrey, Robley, *Condition – Percent Tables for Depreciation of Unit and Group Properties*, Bulletin 156 (Iowa State University, Engineering Research Institute, reprinted 1970); Marston, Anson, Winfrey, Robley, and Hepstead, Jean C., *Engineering Valuation and Depreciation* (Iowa State University Press, 1963).



The depreciation accrual rates were calculated using the average service life depreciation procedure, the straight-line method, and the remaining life basis. Using this approach, the remaining life annual accrual for each category of plant was determined by dividing the original cost less book reserve by the average remaining life determined based on the selected survivor curve. The average remaining life is a weighted average derived from the estimated future survivor curve based on the age of the actual plant additions. The annual depreciation amount is determined by dividing the net plant balance to be recovered by the estimated remaining life. The depreciation accrual rate is then calculated by dividing the annual depreciation amount by the plant balance for the account.

A table showing the current and proposed depreciation accrual rates is included in Appendix A. The Summary of Results included in Appendix B shows the plant balances, the survivor curve, ASL, estimated salvage percentage, net salvage amount, depreciation reserve per books, balance to be recovered, estimated remaining life, annual depreciation amount and base accrual rate for those plant accounts for which sufficient data were available to estimate ASLs and survivor curves. For those accounts for which sufficient data was not available, only the base accrual rates are shown. Historical data and the average remaining life calculations based on the selected survivor curves are included in Appendix C. The results of the study are described below.

## **Distribution Plant**

### **Account 375 – Distribution Structures and Improvements**

Delta's records indicated plant additions dating back to 1951. The current depreciation accrual rate for this account is 2.67%. The survivor curve that best fit the data was the L3 curve with an ASL of 35 years. Using these parameters, the average remaining life is calculated to be 15.5 years. There has been no salvage experienced for this account and none is anticipated. Based on a plant balance of \$112,359, the recommended accrual rate is 2.67%, which is identical to the current rate. The recommended accrual rate is reasonable compared with other gas distribution utilities in the region.

### **Account 376 – Distribution Mains**

This is the account with the largest amount of assets. Delta's records indicated plant additions dating back to 1940. While no single curve maximized all four of the statistics examined (SSD, CI, IV and REI), the R2 curve with an ASL of 34 years provided solid results for all four metrics. Using an R2 curve with an ASL of 34 years, the average remaining life is calculated to be 20.3 years. There has been no salvage experienced for this account and none is anticipated. Based on a plant balance of \$65,974,747, the calculated accrual rate is 3.11%, which is higher than the current rate of 1.41%. Although the higher rate could be supported from the data, it is recommended that Delta increase the rate only to 2.22%. This recommendation is based on judgment and is reasonable compared with other gas distribution utilities in the region.

### **Account 378 – Measuring and Regulator Station Equipment - Distribution**

Delta's records indicated plant additions dating back to 1940. The current depreciation accrual rate for this account is 3.28%. While no single curve maximized all four of the statistics examined (SSD, CI, IV and REI), the L0 curve with an ASL of 30 years provided solid results for all four metrics. Using an L0 curve with an ASL of 30 years, the average remaining life is calculated to be 22.2 years. The salvage rate is expected to be -10% for this account due to removal cost. Based on a plant balance of \$1,396,756, the recommended accrual rate is 3.98%, which is slightly higher than the current rate. The recommended accrual rate is reasonable compared with other gas distribution utilities in the region.

### **Account 379 – Measuring and Regulator Station Equipment – City Gate**

Delta's records indicated plant additions dating back to 1950. The current depreciation accrual rate for this account is 3.01%. An R1 curve was chosen for this plant account because it had good statistical results and is a common curve used for this account in the industry. Using an R1 curve with an ASL of 40 years, the average remaining life is calculated to be 26.7 years. The salvage rate is expected to be -10% for this account due to removal cost. Based on a plant balance of \$500,033, the recommended accrual rate is 2.80%, which is slightly lower than the current rate. The recommended accrual rate is reasonable compared with other gas distribution utilities in the region.

### **Account 380 – Services – Distribution**

Because distribution services were recorded as distribution mains (Account 376) for a number of years, there was not sufficient data to develop survivor curves based on Delta's plant additions and retirements for distribution services. Delta is currently using a depreciation accrual rate of 1.41% for Account 380. The plant balance is \$13,562,075. The recommended accrual rate for this account is 3.07%. This is reasonable compared with other gas distribution utilities in the region.

### **Account 381 – Meters**

Delta's records indicated plant additions dating back to 1940. The current depreciation accrual rate for this account is 2.28%. While no single curve maximized all four of the statistics examined (SSD, CI, IV and REI), the S4 curve with an ASL of 36 years provided excellent results for all four metrics. Using an S4 curve with an ASL of 36 years, the average remaining life is calculated to be 21.4 years. No salvage is anticipated in the future for this account. Based on a plant balance of \$9,302,928 the recommended accrual rate is 3.14%, which is higher than the current rate. The recommended accrual rate is reasonable compared with other gas distribution utilities in the region.



### **Account 382 – Meters & Regulator Installations**

Delta's records indicated plant additions dating back to 1940. The current depreciation accrual rate for this account is 2.33%. An S1 curve was chosen for this plant account because it had sound statistical results. Using an S1 curve with an ASL of 32 years, the average remaining life is calculated to be 18.2 years. The salvage rate is expected to be -45% for this account due to removal cost. Based on a plant balance of \$3,186,037, the calculated accrual rate is 5.08%, which is higher than the current rate. The recommended accrual rate is reasonable compared with other gas distribution utilities in the region.

### **Account 383 – House Regulators**

Delta's records indicated plant additions dating back to 1940. The current depreciation accrual rate for this account is 3.80%. The S0 curve with an ASL of 30 years was chosen because it produced sound statistical results and maximized all four of the statistics examined (SSD, CI, IV and REI). Using an S0 curve with an ASL of 30 years, the average remaining life is calculated to be 20.0 years. Salvage is anticipated to be 5%. Based on a plant balance of \$3,478,550, the recommended accrual rate is 3.88%, which is slightly higher than the current rate. The recommended accrual rate is reasonable compared with other gas distribution utilities in the region.

### **Account 385 – Industrial Measuring and Regulator Station Equipment - Distribution**

Delta's records indicated plant additions dating back to 1956. The current depreciation accrual rate for this account is 2.31%. While no single curve maximized all four of the statistics examined (SSD, CI, IV and REI), the L0 curve with an ASL of 40 years provided sound results for all four metrics. Using an L0 curve with an ASL of 40 years, the average remaining life is calculated to be 31.6 years. Salvage is anticipated to be -10% due to removal cost. Based on a plant balance of \$1,567,108, the recommended accrual rate is 2.57%, which is slightly higher than the current rate. The recommended accrual rate is reasonable compared with other gas distribution utilities in the region.

### **Gathering and Transmission Plant**

#### **Account 305 – Structures and Improvements – Manufactured Gas Plant**

There is currently no plant balance for this account. The depreciation rate for this account was 2.20%. If additional investment were made in this account, we would recommend using Delta's existing rate of 2.20%.

#### **Account 325 – Gathering Land & Rights**

Delta's records indicated plant additions dating back to 1959. The plant balance is \$79,004. The current depreciation accrual rate for this account is 3.00%. The curve fitting statistics

were poor for all survivor curve types. Based on judgment, we are not proposing to modify the existing accrual rate of 3.00%.

#### **Account 327 – Compressor Station Structures**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for this account. Delta is currently using a depreciation accrual rate of 3.00% for Account 327. We are recommending that Delta maintain its current accrual rate of 3.00%. The plant balance is \$45,721.

#### **Account 331 – Producing Gas Wells – Well Equipment**

Delta's records indicated plant additions dating back to 1969. The plant balance is \$7,795. However, the plant in this account is fully depreciated. If additional investment were made in this account, we would recommend using Delta's existing rate of 4.00%.

#### **Account 332 – Gathering Lines**

The retirement data for this account produce curves with poor statistical results. Delta is currently using a depreciation accrual rate of 2.25% for Account 332, which has a balance of \$1,915,975. We are recommending that Delta maintain its current accrual rate of 2.25%.

#### **Account 333 – Gathering Compressor Stations**

Delta's records indicated plant additions dating back only to 1986. The plant balance is \$749,211. The current depreciation accrual rate for this account is 4.00%. The curve fitting statistics were poor for all survivor curve types. We are recommending that Delta maintain its current accrual rate of 4.00%.

#### **Account 334 – Gathering Lines**

The retirement data for this account produce curves with poor statistical results. Delta is currently using a depreciation accrual rate of 4.00% for Account 334, which has a balance of \$147,297. We are recommending that Delta maintain its current accrual rate of 2.72%.

#### **Account 365.3 – Land Rights**

Delta's records indicated plant additions dating back to 1958. The current depreciation accrual rate for this account is 2.50%. Based on a plant balance of \$163,626, we recommend that Delta maintain the accrual rate of 2.50%.

#### **Account 366 – Structures and Improvements - Transmission**

Delta's records indicated plant additions dating back to 1951. The plant balance is \$244,453. The current depreciation accrual rate for this account is 2.00%. There has been no salvage experienced for this account and none is anticipated. While no single curve maximized all



four of the statistics examined (SSD, CI, IV and REI), the R1 curve with an ASL of 38 years provided excellent results for all four metrics. Using an R1 curve with an ASL of 38 years, the average remaining life is calculated to be 28.3 years. We recommend an accrual rate of 2.49%, which is higher than the existing rate.

#### **Account 367 – Mains - Transmission**

Delta's records indicated plant additions dating back to 1951. The current depreciation accrual rate for this account is 2.24%. While no single curve maximized all four of the statistics examined (SSD, CI, IV and REI), the L0 curve with an ASL of 35 years provided excellent results for all four metrics. Using an L0 curve with an ASL of 35 years, the average remaining life is calculated to be 26.6 years. No salvage is anticipated for this account. Based on a plant balance of \$42,014,896, the recommended accrual rate is 2.52%, which is slightly higher than the current rate.

#### **Account 368 – Compressor Station Equipment - Transmission**

Delta's records indicated plant additions dating back to 1961. The plant balance is \$7,498,154. The current depreciation accrual rate for this account is 2.00%. Delta made significant additions to plant since 2006 -- more than tripling the balance of plant since that time. While no single curve maximized all four of the statistics examined (SSD, CI, IV and REI), the L2 curve with an ASL of 32 years provided excellent results for all four metrics. Using an L2 curve with an ASL of 32 years, the average remaining life is calculated to be 25.1 years, we are recommending that Delta increase its accrual rate to 3.43%.

#### **Account 369 – Measuring and Regulator Station Equipment - Transmission**

Delta's records indicated plant additions dating back to 1951. The current depreciation accrual rate for this account is 2.22%. While no single curve maximized all four of the statistics examined (SSD, CI, IV and REI), the L0 curve with an ASL of 26 years provided excellent results for all four metrics. Using an L0 curve with an ASL of 26 years, the average remaining life is calculated to be 21.0 years. Salvage is expected to be -10% due to removal cost. Based on a plant balance of \$3,380,321, the recommended accrual rate is 4.30%, which is higher than the current rate.

#### **Account 371 – Other Equipment - Transmission**

Delta's records indicated plant additions dating back to 1959. The plant balance is \$445,043. The current depreciation accrual rate for this account is 2.00%. The curve fitting statistics were poor for all survivor curve types. Based on judgment and a comparison of depreciation accrual rates of other utilities in the region, we are proposing that Delta maintain its accrual rate of 2.00%.

## **Storage Plant**

### **Account 351 -- Storage Structures and Improvements**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 2.20% for Account 351. Continuing the accrual rate of 2.20% is recommended based on an expected remaining life of 29.0 years. The plant balance is \$292,484. The recommended accrual rate is consistent with other utilities in the region.

### **Account 352 -- Storage Wells**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 2.19% for Account 352. Maintaining an accrual rate of 2.19% is recommended based on an expected remaining life of approximately 29.0 years. The plant balance is \$2,876,146. The recommended accrual rate is consistent with other utilities in the region.

#### **Account 352.1 -- Storage Rights**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 1.85% for Account 352.1. Maintaining an accrual rate of 1.85% is recommended based on an expected remaining life of approximately 29.0 years. The plant balance is \$860,396. The recommended accrual rate is consistent with other utilities in the region.

#### **Account 352.2 -- Storage Reservoirs**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 1.78% for Account 352.2. Maintaining an accrual rate of 1.78% is recommended based on an expected remaining life of approximately 29.0 years. The plant balance is \$1,881,731. The recommended accrual rate is consistent with other utilities in the region.

#### **Account 352.3 -- Storage Nonrec Natural Gas**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 1.75% for Account 352.3. Maintaining an accrual rate of 1.75% is recommended based on an expected remaining life of approximately 29.0 years. The plant balance is \$294,307. The recommended accrual rate is consistent with other utilities in the region.



### **Account 353 -- Storage Lines**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 2.05% for Account 353. Maintaining an accrual rate of 2.05% is recommended based on an expected remaining life of approximately 29.0 years. The plant balance is \$5,102,436. The recommended accrual rate is consistent with other utilities in the region.

### **Account 354 -- Storage Compressor Lines**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 1.90% for Account 354. Maintaining an accrual rate of 1.90% is recommended based on an expected remaining life of approximately 29.0 years. The plant balance is \$2,526,069. The recommended accrual rate is consistent with other utilities in the region.

### **Account 355 -- Storage Measuring and Regulator Equipment**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 2.41% for Account 355. Maintaining an accrual rate of 2.69% is recommended based on an expected remaining life of approximately 29.0 years. The plant balance is \$379,709. The recommended accrual rate is consistent with other utilities in the region.

### **Account 356 -- Purification Equipment**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 1.91% for Account 356. Maintaining an accrual rate of 1.91% is recommended based on an expected remaining life of approximately 23.0 years. The plant balance is \$409,570. The recommended accrual rate is consistent with other utilities in the region.

### **Account 357 -- Storage Other Equipment**

There was not sufficient historical data to develop survivor curves based on Delta's plant additions and retirements for its storage investment. Delta is currently using a depreciation accrual rate of 0.53% for Account 357. Maintaining an accrual rate of 0.53% is recommended based on an expected remaining life of approximately 23.0 years. The plant balance is \$47,209. The recommended accrual rate is consistent with other utilities in the region.



## **General Plant**

### **Account 390 – Structures and Improvements**

Delta's records indicated plant additions dating back to 1958. The current depreciation accrual rate for this account is 2.00%. While no single curve maximized all four of the statistics examined (SSD, CI, IV and REI), the L0 curve with an ASL of 35 years provided solid results for all four metrics. Using an L0 curve with an ASL of 35 years, the average remaining life is calculated to be 27.0 years. The salvage rate is expected to be 40% for this account. Based on a plant balance of \$5,355,492, it is recommended that Delta maintain the current accrual rate of 2.00%. The recommended accrual rate is reasonable compared with other gas distribution utilities in the region.

### **Account 391 – Office Furniture**

The retirement data did not produce a curve with sufficient statistical results. Delta is currently using a depreciation accrual rate of 1.00% for Account 391. The plant balance is \$146,777 and the salvage rate is expected to be 5% for this account. It is recommended that Delta maintain the accrual rate of 1.00%, which will remain in line with other utilities in the region.

### **Account 392 – Transportation Equipment**

There was not a sufficient amount of retirements to develop survivor curves based on Delta's plant data. The curve fitting statistics were marginal for all survivor curve types. The existing accrual rate is 8.14% and the plant balance is \$4,201,697. Salvage rate is estimated at 30%. It is recommended that Delta maintain use of 8.14% for this account. This accrual rate is in line with other utilities in the region.

### **Account 393 – Stores Equipment**

There was not a sufficient amount of retirements to develop survivor curves based on Delta's plant data. The curve fitting statistics were marginal for all survivor curve types. The plant balance is \$36,011. It is recommended that Delta maintain the current accrual rate of 2.00%, which is in line with other utilities in the region.

### **Account 394 – Tools and Equipment**

There was not a sufficient amount of retirements to develop survivor curves based on Delta's plant data. The curve fitting statistics were poor for all survivor curve types. The plant balance is \$703,034. It is recommended that Delta maintain the existing accrual rate of 4.00%, which is in line with other utilities in the region.

### **Account 395 – Laboratory Equipment**

Delta's records indicated plant additions dating back to 1957. The current depreciation accrual rate for this account is 5.00%. The plant balance is \$237,610. After reviewing the account we recommend that the depreciation rate be maintained at 5.00%, which is in line with other utilities in the region.

### **Account 396 – Power Operated Equipment**

Delta's records indicated plant additions dating back to 1964. The current depreciation accrual rate for this account is 2.00%. The curve fitting statistics were poor for all survivor curve types. The plant balance is \$3,294,567. Based on judgment and a comparison of depreciation accrual rates of other utilities in the region, it is recommended that Delta maintain the existing accrual rate of 2.00%.

### **Account 397 – Communication Equipment**

The retirement data did not produce a curve with sufficient statistical results. Delta is currently using a depreciation accrual rate of 5.00% for Account 397. The plant balance is \$386,003. It is recommended that Delta maintain the current accrual rate of 5.00%, which will remain in line with other utilities in the region.

### **Account 398 – Miscellaneous Equipment**

There was not a sufficient amount of retirements to develop survivor curves based on Delta's plant data. The curve fitting statistics were poor for all survivor curve types. Delta is currently using a depreciation accrual rate of 2.00% for Account 398, which has a balance of \$44,382. It is recommended that Delta maintain the existing accrual rate of 2.00%, which will remain in line with other utilities in the region.

### **Account 399.1 – Other Tangible Property – Mapping Software**

The current depreciation accrual rate for this account is 4.0%. It is recommended that Delta maintain this accrual rate. The plant balance is \$638,509.

### **Account 399.2 – Other Tangible Property – Computer Software**

The current depreciation accrual rate for this account is 10.0%. Based on judgment concerning the expected rate of obsolescence for this type of property, it is recommended that Delta maintain the existing accrual rate, consistent with other utilities in the region.

### **Account 399.3 – Other Tangible Property – Computer Hardware**

The current depreciation accrual rate for this account is 10.0%. Based on judgment concerning the expected rate of obsolescence for this type of property, it is recommended that Delta maintain the existing accrual rate, consistent with other utilities in the region.

## **Appendix A**



Delta Natural Gas Company  
Depreciation Study

Proposed Depreciation Rates

Account	Current Accrual Rate	Proposed Accrual Rate
305 Structures & Improvements - Manufactured Gas Plant	2.20%	2.20%
306 Gathering Land & Rights	3.00%	3.00%
325 Comp Station Structures	3.00%	3.00%
327 Producing Gas Wells - Well Equipment	4.00%	4.00%
331 Gathering Lines	2.25%	2.25%
332 Gathering Compressor Stations	4.00%	4.00%
333 Gathering Measuring and Regulator Station Equipment	2.72%	2.72%
334 Gathering Asset Retirement Cost	5.00%	5.00%
339 Gas Rights Storage	2.20%	2.20%
350.06 Storage Structures and Improvements	2.19%	2.19%
351 Storage Wells	1.85%	1.85%
352 Storage Rights	1.76%	1.76%
352.1 Storage Reservoirs	1.75%	1.75%
352.2 Storage Nonrec Natural Gas	2.05%	2.05%
353 Storage Lines	1.90%	1.90%
354 Storage Compressor Stations	2.41%	2.41%
355 Storage Measuring and Regulator Equipment	1.91%	1.91%
356 Purification Equipment	0.53%	0.53%
357 Storage Other Equipment		
358 Storage Asset Retirement Cost		
365.1 Transmission Land & Rights		
365.2 Rights of Way	2.50%	2.50%
366 Land Rights	2.00%	2.49%
366 Structures & Improvements - Transmission	2.24%	2.52%
367 Mains - Transmission	2.00%	3.43%
368 Compressor Station Equipment - Transmission	2.00%	3.43%
369 Measuring and Regulator Station Equipment - Transmission	2.22%	4.30%
371 Other Equipment - Transmission	2.00%	2.00%
372 Transmission Asset Retirement Cost		
374 Distribution Rights of Way		
374.1 Distribution Land	2.67%	2.67%
375 Structures and Improvements - Distribution	1.41%	2.22%
376 Mains - Distribution	3.28%	3.89%
378 Measuring and Regulator Station Equipment - Distribution	3.01%	2.80%
379 Measuring and Regulator Station Equipment - City Gate	1.41%	3.07%
380 Services - Distribution	2.28%	3.14%
381 Meters	2.33%	5.08%
382 Meter & Regulator Installations	3.80%	3.86%
383 Hoses Regulators	2.31%	2.57%
385 Industrial Measuring and Regulator Station Equipment - Distribution		
388 Distribution Asset Retirement Cost		
389 Land and Land Rights	2.00%	2.00%
390 Structures and Improvements - General Plant	1.00%	1.00%
391 Office Furniture and Equipment - General Plant	8.14%	8.14%
392 Transportation Equipment	2.00%	2.00%
393 Stores Equipment	4.00%	4.00%
394 Tools & Equipment		
394.01 Comp Nat Gas Stat	5.00%	5.00%
395 Laboratory Equipment	2.00%	2.00%
396 Power Operated Equipment	5.00%	5.00%
397 Communication Equipment	2.00%	2.00%
398 Miscellaneous Equipment	4.00%	4.00%
399.1 Other Tangible Property - Mapping Costs	10.00%	10.00%
399.2 Other Tangible Property - Computer Software	10.00%	10.00%
399.03.1 Computerized Office Equipment	10.00%	10.00%
399.03 Computer Hardware	10.00%	10.00%

## **Appendix B**



Delta Natural Company  
Depreciation Study  
Proposed Depreciation Rates

Account	Plant Balance	Dispersion	ASL	Estimated Salvage %	Net Salvage Amount	Depreciation Book Reserve	Balance To Be Recovered	Estimated Life Remaining	Annual Depreciation Amount	Base Accrual Rate
305 Structures & Improvements - Manufactured Gas Plant										
325 Gathering Land & Rights	\$ 79,004			0%	\$ -	\$ 59,275	\$ 19,729			2.20%
326 Comp Station Structures	\$ 45,721			0%	\$ -	\$ 28,429	\$ (0)			3.00%
331 Producing Gas Wells - Well Equipment	\$ 7,795			0%	\$ -	\$ 7,803	\$ (0)			4.00%
332 Gathering Lines	\$ 1,915,975			0%	\$ -	\$ 1,345,777	\$ 570,198	14.0	\$ 40,728	2.25%
333 Gathering Compressor Stations	\$ 149,217			0%	\$ -	\$ 559,404	\$ 189,807			4.00%
334 Gathering Measuring and Regulator Station Equipment	\$ 141,297			0%	\$ -	\$ 81,169	\$ 66,108	15.0	\$ 4,407	2.72%
339 Gathering Asset Retirement Cost	\$ 10,790				\$ -	\$ 10,744	\$ -			5.00%
350.06 Gas Rights Storage										2.98%
351 Storage Structures and Improvements	\$ 292,484				\$ -	\$ 73,277	\$ 219,207	29.0	\$ 7,559	3.19%
352 Storage Wells	\$ 2,876,148				\$ -	\$ 214,801	\$ 2,661,345	29.0	\$ 91,771	1.85%
352.1 Storage Rights	\$ 860,396				\$ -	\$ 399,900	\$ 460,496	29.0	\$ 15,879	1.63%
352.2 Storage Reservoirs	\$ 1,881,731				\$ -	\$ 885,570	\$ 986,161	29.0	\$ 34,350	1.75%
352.3 Storage Nonrec Natural Gas	\$ 294,307				\$ -	\$ 144,921	\$ 149,386	29.0	\$ 5,151	2.05%
353 Storage Lines	\$ 5,102,436				\$ -	\$ 2,070,537	\$ 3,031,899	29.0	\$ 104,548	1.96%
354 Storage Compressor Stations	\$ 2,526,069				\$ -	\$ 1,088,735	\$ 1,437,334	29.0	\$ 48,563	2.59%
355 Storage Measuring and Regulator Equipment	\$ 379,709				\$ -	\$ 94,900	\$ 284,809	29.0	\$ 9,821	3.19%
356 Purification Equipment	\$ 409,570				\$ -	\$ 108,901	\$ 300,669	23.0	\$ 13,073	0.51%
357 Storage Other Equipment	\$ 47,209				\$ -	\$ 41,680	\$ 5,529	23.0	\$ 240	
358 Storage Asset Retirement Cost	\$ 11,721				\$ -	\$ 3,723	\$ 7,998			
359 Transmission Land & Rights	\$ 140,670				\$ -	\$ -	\$ 1,215,558			2.50%
365.1 Rights of Way	\$ 1,215,558			0%	\$ -	\$ 163,626	\$ -			2.30%
365.2 Structures & Improvements - Transmission	\$ 163,626				\$ -	\$ 85,517	\$ 158,936	28.3	\$ 5,616	2.35%
366 Mains - Transmission	\$ 42,014,696			0%	\$ -	\$ 15,753,075	\$ 26,261,821	26.6	\$ 987,287	3.26%
367 Compressor Station Equipment - Transmission	\$ 7,498,154			0%	\$ -	\$ 1,368,520	\$ 6,129,234	25.1	\$ 244,193	3.53%
368 Measuring and Regulator Station Equipment - Transmission	\$ 3,380,321			0%	\$ -	\$ 873,324	\$ 2,506,997	21.0	\$ 119,381	2.19%
371 Other Equipment - Transmission	\$ 445,043			0%	\$ -	\$ 302,674	\$ 142,369	14.6	\$ 9,751	
372 Transmission Asset Retirement Cost	\$ 34,920				\$ -	\$ 9,914	\$ -			
374 Distribution Rights of Way	\$ 264,478				\$ -	\$ -	\$ -			
374.1 Distribution Land	\$ 63,206				\$ -	\$ 71,613	\$ 40,746	15.5	\$ 2,629	2.34%
375 Structures and Improvements - Distribution	\$ 112,359				\$ -	\$ 24,354,420	\$ 41,620,327	20.3	\$ 2,050,262	3.11%
376 Mains - Distribution	\$ 65,974,747			0%	\$ -	\$ 409,896	\$ 886,860	22.2	\$ 44,453	3.19%
378 Measuring and Regulator Station Equipment - Distribution	\$ 1,396,756			-10%	\$ (139,675.60)	\$ 210,374	\$ 289,659	26.7	\$ 10,849	2.17%
379 Measuring and Regulator Station Equipment - City Gate	\$ 500,033			-10%	\$ (50,003.30)	\$ 2,285,296	\$ 11,266,779			3.11%
380 Services - Distribution	\$ 13,562,075			0%	\$ -	\$ 3,525,902	\$ 5,777,026	21.4	\$ 269,964	2.90%
381 Meters	\$ 9,502,928			0%	\$ -	\$ 865,590	\$ 2,320,447	18.2	\$ 127,497	4.00%
382 Meter & Regulator Installations	\$ 3,186,037			-45%	\$ (1,433,716.65)	\$ 1,487,565	\$ 1,990,965	20.0	\$ 99,549	4.13%
383 Houses Regulators	\$ 3,778,550			5%	\$ 173,927.50	\$ 502,983	\$ 1,064,125	31.6	\$ 33,675	2.15%
385 Industrial Measuring and Regulator Station Equipment - Distribution	\$ 1,367,108			-10%	\$ (156,710.80)	\$ -	\$ -			
388 Distribution Asset Retirement Cost	\$ 80,914				\$ -	\$ 110,027	\$ -			
389 Land and Land Rights	\$ 999,354				\$ -	\$ 1,989,928	\$ 1,223,367	27.0	\$ 45,310	2.00%
390 Structures and Improvements - General Plant	\$ 5,355,492			5%	\$ 7,338.85	\$ 89,551	\$ 49,887			1.00%
391 Office Furniture and Equipment - General Plant	\$ 146,777			30%	\$ 1,260,509.10	\$ 1,888,016	\$ 1,053,172			8.14%
392 Transportation Equipment	\$ 4,201,687			0%	\$ -	\$ 29,459	\$ 6,552			2.00%
393 Stores Equipment	\$ 36,011			5%	\$ 35,151.70	\$ 244,884	\$ 422,988			4.00%
394 Tools & Equipment	\$ 703,034			5%	\$ -	\$ 263,352	\$ -			5.00%
394.01 Comp Nat Gas Stat	\$ 283,352			0%	\$ -	\$ 165,850	\$ 71,760			2.00%
395 Laboratory Equipment	\$ 231,610			40%	\$ 1,317,826.80	\$ 1,614,109	\$ 362,631			5.00%
396 Power Operated Equipment	\$ 3,294,567			5%	\$ 19,300.15	\$ 237,639	\$ 129,064			2.00%
397 Communication Equipment	\$ 386,003			5%	\$ 2,219.10	\$ 36,590	\$ 5,573			4.00%
398 Miscellaneous Equipment	\$ 44,382			0%	\$ -	\$ 638,509	\$ -			10.00%
399.1 Other Tangible Property - Mapping Coats	\$ 638,509			0%	\$ -	\$ 2,677,161	\$ 1,043,313			10.00%
399.2 Other Tangible Property - Computer Software	\$ 3,720,474			0%	\$ -	\$ 161,049	\$ -			10.00%
399.03 Computerized Office Equipment	\$ 226,689				\$ -	\$ -	\$ -			10.00%
399.03 Computer Hardware	\$ 868,541				\$ -	\$ 767,947	\$ 200,584			10.00%

## **Appendix C**

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 366 -- Structures and Improvements

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	-	0	38	R1	-	-	2.30	-	-
1941	-	0	38	R1	-	-	2.60	-	-
1942	-	0	38	R1	-	-	2.90	-	-
1943	-	0	38	R1	-	-	3.19	-	-
1944	-	0	38	R1	-	-	3.49	-	-
1945	-	0	38	R1	-	-	3.79	-	-
1946	-	0	38	R1	-	-	4.09	-	-
1947	-	0	38	R1	-	-	4.39	-	-
1948	-	0	38	R1	-	-	4.71	-	-
1949	-	0	38	R1	-	-	5.02	-	-
1950	-	0	38	R1	-	-	5.35	-	-
1951	200	0	38	R1	5	-	5.67	-	30
1952	-	0	38	R1	-	-	6.01	-	-
1953	-	0	38	R1	-	-	6.35	-	-
1954	-	0	38	R1	-	-	6.70	-	-
1955	-	0	38	R1	-	-	7.05	-	-
1956	2,153	0	38	R1	57	-	7.41	-	420
1957	-	0	38	R1	-	-	7.78	-	-
1958	92	0	38	R1	2	-	8.16	-	20
1959	2,000	0	38	R1	53	-	8.54	-	449
1960	339	0	38	R1	9	-	8.93	-	80
1961	250	0	38	R1	7	-	9.32	-	61
1962	604	0	38	R1	16	-	9.73	-	155
1963	-	0	38	R1	-	-	10.14	-	-
1964	707	0	38	R1	19	-	10.56	-	196
1965	395	0	38	R1	10	-	10.98	-	114
1966	1,926	0	38	R1	51	-	11.42	-	579
1967	472	0	38	R1	12	-	11.86	-	147
1968	-	0	38	R1	-	-	12.31	-	-
1969	-	0	38	R1	-	-	12.77	-	-
1970	-	0	38	R1	-	-	13.24	-	-
1971	-	0	38	R1	-	-	13.72	-	-
1972	-	0	38	R1	-	-	14.20	-	-
1973	446	0	38	R1	12	-	14.70	-	172
1974	844	0	38	R1	22	-	15.20	-	338
1975	4,930	0	38	R1	130	-	15.71	-	2,039
1976	-	0	38	R1	-	-	16.24	-	-
1977	(805)	0	38	R1	(21)	-	16.77	-	(355)
1978	-	0	38	R1	-	-	17.31	-	-
1979	-	0	38	R1	-	-	17.86	-	-





Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 367 -- Transmission Mains

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	-	0	35	L0	-	-	11.87	-	-
1941	-	0	35	L0	-	-	12.06	-	-
1942	-	0	35	L0	-	-	12.26	-	-
1943	-	0	35	L0	-	-	12.46	-	-
1944	-	0	35	L0	-	-	12.66	-	-
1945	-	0	35	L0	-	-	12.86	-	-
1946	-	0	35	L0	-	-	13.06	-	-
1947	-	0	35	L0	-	-	13.27	-	-
1948	-	0	35	L0	-	-	13.48	-	-
1949	-	0	35	L0	-	-	13.69	-	-
1950	-	0	35	L0	-	-	13.91	-	-
1951	61,761	0	35	L0	1,765	-	14.13	-	24,929
1952	-	0	35	L0	-	-	14.35	-	-
1953	-	0	35	L0	-	-	14.57	-	-
1954	8,944	0	35	L0	256	-	14.80	-	3,781
1955	95,433	0	35	L0	2,727	-	15.02	-	40,965
1956	153,043	0	35	L0	4,373	-	15.25	-	66,704
1957	2,766	0	35	L0	79	-	15.49	-	1,224
1958	40,731	0	35	L0	1,164	-	15.73	-	18,300
1959	209,986	0	35	L0	6,000	-	15.97	-	95,784
1960	443,547	0	35	L0	12,673	-	16.21	-	205,398
1961	-	0	35	L0	-	-	16.45	-	-
1962	11,049	0	35	L0	316	-	16.70	-	5,273
1963	5,069	0	35	L0	145	-	16.95	-	2,456
1964	43,691	0	35	L0	1,248	-	17.21	-	21,484
1965	401,158	0	35	L0	11,462	-	17.47	-	200,222
1966	185,675	0	35	L0	5,305	-	17.73	-	94,063
1967	42,318	0	35	L0	1,209	-	18.00	-	21,759
1968	570,758	0	35	L0	16,307	-	18.27	-	297,864
1969	10,242	0	35	L0	293	-	18.54	-	5,425
1970	30,291	0	35	L0	865	-	18.81	-	16,283
1971	390,160	0	35	L0	11,147	-	19.09	-	212,857
1972	220,046	0	35	L0	6,287	-	19.38	-	121,834
1973	20,159	0	35	L0	576	-	19.67	-	11,327
1974	155,219	0	35	L0	4,435	-	19.96	-	88,511
1975	1,038,377	0	35	L0	29,668	-	20.25	-	600,890
1976	667,139	0	35	L0	19,061	-	20.55	-	391,777
1977	32,582	0	35	L0	931	-	20.86	-	19,417
1978	351,269	0	35	L0	10,036	-	21.17	-	212,429
1979	157,163	0	35	L0	4,490	-	21.48	-	96,448



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 367 -- Transmission Mains

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1980	637,037	0	35	L0	18,201	-	21.80	-	396,709
1981	94,865	0	35	L0	2,710	-	22.12	-	59,948
1982	67,797	0	35	L0	1,937	-	22.44	-	43,475
1983	100,369	0	35	L0	2,868	-	22.77	-	65,311
1984	124,371	0	35	L0	3,553	-	23.11	-	82,122
1985	920,732	0	35	L0	26,307	-	23.45	-	616,917
1986	656,696	0	35	L0	18,763	-	23.80	-	446,488
1987	419,996	0	35	L0	12,000	-	24.15	-	289,763
1988	407,419	0	35	L0	11,641	-	24.50	-	285,226
1989	1,403,591	171586	35	L0	40,103	4,902	24.86	-	997,103
1990	409,629	0	35	L0	11,704	-	25.23	-	295,285
1991	475,208	114998	35	L0	13,577	3,286	25.60	-	347,605
1992	770,645	0	35	L0	22,018	-	25.98	-	572,018
1993	1,311,531	0	35	L0	37,472	-	26.36	-	987,845
1994	1,842,857	172928	35	L0	52,653	4,941	26.75	-	1,408,558
1995	2,576,777	0	35	L0	73,622	-	27.15	-	1,998,799
1996	2,206,080	0	35	L0	63,031	-	27.56	-	1,736,906
1997	983,281	0	35	L0	28,094	-	27.97	-	785,897
1998	1,073,527	0	35	L0	30,672	-	28.40	-	871,202
1999	664,955	4126412	35	L0	18,999	117,897	28.85	22.44	3,194,111
2000	1,951,563	0	35	L0	55,759	-	29.30	-	1,633,968
2001	710,776	0	35	L0	20,308	-	29.78	-	604,735
2002	3,267,444	0	35	L0	93,356	-	30.27	-	2,825,968
2003	4,131,461	0	35	L0	118,042	-	30.78	-	3,633,861
2004	1,777,954	0	35	L0	50,799	-	31.32	-	1,591,106
2005	767,710	0	35	L0	21,935	-	31.89	-	699,417
2006	3,695,479	0	35	L0	105,585	-	32.48	-	3,429,786
2007	23,029	0	35	L0	658	-	33.12	-	21,792
2008	422,077	0	35	L0	12,059	-	33.81	-	407,704
2009	584,129	0	35	L0	16,689	-	34.57	-	576,954
	39,827,561	4,585,924			1,137,930	131,026	29.69		33,783,981
									26.6

Average Remaining Life

Survivor Curve ASL  
 L0  
 35

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 368 -- Compressor Station Equipment

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	-	0	32	L2	-	-	3.90	-	-
1941	-	0	32	L2	-	-	4.09	-	-
1942	-	0	32	L2	-	-	4.29	-	-
1943	-	0	32	L2	-	-	4.48	-	-
1944	-	0	32	L2	-	-	4.67	-	-
1945	-	0	32	L2	-	-	4.87	-	-
1946	-	0	32	L2	-	-	5.07	-	-
1947	-	0	32	L2	-	-	5.27	-	-
1948	-	0	32	L2	-	-	5.48	-	-
1949	-	0	32	L2	-	-	5.68	-	-
1950	-	0	32	L2	-	-	5.89	-	-
1951	-	0	32	L2	-	-	6.11	-	-
1952	-	0	32	L2	-	-	6.32	-	-
1953	-	0	32	L2	-	-	6.54	-	-
1954	-	0	32	L2	-	-	6.76	-	-
1955	-	0	32	L2	-	-	6.98	-	-
1956	-	0	32	L2	-	-	7.21	-	-
1957	-	0	32	L2	-	-	7.44	-	-
1958	-	0	32	L2	-	-	7.67	-	-
1959	-	0	32	L2	-	-	7.91	-	-
1960	-	0	32	L2	-	-	8.14	-	-
1961	794	0	32	L2	25	-	8.39	-	208
1962	11,090	0	32	L2	347	-	8.63	-	2,991
1963	89,639	0	32	L2	2,801	-	8.88	-	24,868
1964	2,757	0	32	L2	86	-	9.13	-	786
1965	76,220	0	32	L2	2,382	-	9.38	-	22,334
1966	1,010	0	32	L2	32	-	9.63	-	304
1967	1,745	0	32	L2	55	-	9.88	-	539
1968	-	0	32	L2	-	-	10.13	-	-
1969	3,869	0	32	L2	121	-	10.38	-	1,255
1970	480	0	32	L2	15	-	10.63	-	160
1971	23,086	0	32	L2	721	-	10.88	-	7,851
1972	309	0	32	L2	10	-	11.13	-	107
1973	-	0	32	L2	-	-	11.38	-	-
1974	958	0	32	L2	30	-	11.62	-	348
1975	57,007	0	32	L2	1,781	-	11.86	-	21,126
1976	43,971	0	32	L2	1,374	-	12.10	-	16,625
1977	-	0	32	L2	-	-	12.34	-	-



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 369 -- Measuring Regulating Station Equipment

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	-	0	26	L0	-	-	5.78	-	-
1941	-	0	26	L0	-	-	5.93	-	-
1942	-	0	26	L0	-	-	6.08	-	-
1943	-	0	26	L0	-	-	6.24	-	-
1944	-	0	26	L0	-	-	6.39	-	-
1945	-	0	26	L0	-	-	6.55	-	-
1946	-	0	26	L0	-	-	6.71	-	-
1947	-	0	26	L0	-	-	6.88	-	-
1948	-	0	26	L0	-	-	7.04	-	-
1949	-	0	26	L0	-	-	7.21	-	-
1950	-	0	26	L0	-	-	7.38	-	-
1951	604	0	26	L0	23	-	7.56	-	176
1952	-	0	26	L0	-	-	7.73	-	-
1953	-	0	26	L0	-	-	7.91	-	-
1954	-	0	26	L0	-	-	8.09	-	-
1955	2,821	0	26	L0	109	-	8.28	-	898
1956	3,317	0	26	L0	128	-	8.46	-	1,080
1957	1,730	0	26	L0	67	-	8.65	-	576
1958	4,222	0	26	L0	162	-	8.84	-	1,436
1959	11,640	0	26	L0	448	-	9.04	-	4,046
1960	36,436	0	26	L0	1,401	-	9.24	-	12,943
1961	2,350	0	26	L0	90	-	9.44	-	853
1962	143	0	26	L0	6	-	9.64	-	53
1963	1,590	0	26	L0	61	-	9.85	-	602
1964	2,469	0	26	L0	95	-	10.06	-	955
1965	11,196	0	26	L0	431	-	10.27	-	4,423
1966	12,600	0	26	L0	485	-	10.49	-	5,083
1967	6,054	0	26	L0	233	-	10.71	-	2,493
1968	5,943	0	26	L0	229	-	10.93	-	2,499
1969	18,946	0	26	L0	729	-	11.16	-	8,132
1970	4,457	0	26	L0	171	-	11.39	-	1,953
1971	22,690	0	26	L0	873	-	11.63	-	10,146
1972	1,848	0	26	L0	71	-	11.87	-	843
1973	11,003	0	26	L0	423	-	12.11	-	5,124
1974	21,450	0	26	L0	825	-	12.36	-	10,194
1975	68,977	0	26	L0	2,653	-	12.61	-	33,449
1976	25,972	0	26	L0	999	-	12.86	-	12,850
1977	5,860	0	26	L0	225	-	13.12	-	2,958
1978	2,125	0	26	L0	82	-	13.39	-	1,094



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 369 -- Measuring Regulating Station Equipment

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1979	11,949	0	26	L0	460	-	13.66	-	6,278
1980	4,539	0	26	L0	175	-	13.93	-	2,433
1981	2,096	0	26	L0	81	-	14.21	-	1,146
1982	2,119	0	26	L0	82	-	14.50	-	1,182
1983	11,231	0	26	L0	432	-	14.79	-	6,389
1984	93,670	0	26	L0	3,603	-	15.09	-	54,350
1985	40,669	0	26	L0	1,564	-	15.39	-	24,068
1986	4,156	0	26	L0	160	-	15.69	-	2,509
1987	1,551	0	26	L0	60	-	16.01	-	955
1988	14,728	0	26	L0	566	-	16.33	-	9,248
1989	65,410	23055	26	L0	2,516	887	16.65	-	41,889
1990	40,717	0	26	L0	1,566	-	16.98	-	26,594
1991	39,795	0	26	L0	1,531	-	17.32	-	26,509
1992	43,190	0	26	L0	1,661	-	17.66	-	29,342
1993	44,138	0	26	L0	1,698	-	18.02	-	30,583
1994	37,008	0	26	L0	1,423	-	18.37	-	26,152
1995	11,055	0	26	L0	425	-	18.74	-	7,967
1996	19,636	0	26	L0	755	-	19.11	-	14,433
1997	138,952	0	26	L0	5,344	-	19.49	-	104,165
1998	198,341	0	26	L0	7,629	-	19.88	-	151,650
1999	363,028	163168	26	L0	13,963	6,276	20.28	-	283,146
2000	185,729	0	26	L0	7,143	-	20.69	-	147,808
2001	84,508	0	26	L0	3,250	-	21.12	-	68,645
2002	184,938	0	26	L0	7,113	-	21.57	-	153,397
2003	78,872	0	26	L0	3,034	-	22.03	-	66,837
2004	146,005	0	26	L0	5,616	-	22.52	-	126,484
2005	249,689	0	26	L0	9,603	-	23.04	-	221,296
2006	219,987	0	26	L0	8,461	-	23.60	-	199,656
2007	409,207	0	39	L0	10,492.49	-	37.10	-	389,227
2008	103,098	0	39	L0	2,644	-	37.80	-	99,915
2009	207,408	0	39	L0	5,318	-	38.57	-	205,108
	3,343,861	186,223			119,383	7,162	22.23		2,654,219

Average Remaining Life

Survivor Curve  
ASL

L0  
26



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002

375 -- Distribution Structures and Improvements

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	-	0	35	L3	-	-	2.77	-	-
1941	-	0	35	L3	-	-	2.97	-	-
1942	-	0	35	L3	-	-	3.17	-	-
1943	-	0	35	L3	-	-	3.37	-	-
1944	-	0	35	L3	-	-	3.58	-	-
1945	-	0	35	L3	-	-	3.79	-	-
1946	-	0	35	L3	-	-	4.01	-	-
1947	-	0	35	L3	-	-	4.22	-	-
1948	-	0	35	L3	-	-	4.44	-	-
1949	-	0	35	L3	-	-	4.67	-	-
1950	-	0	35	L3	-	-	4.89	-	-
1951	400	0	35	L3	11	-	5.12	-	59
1952	-	0	35	L3	-	-	5.36	-	-
1953	-	0	35	L3	-	-	5.59	-	-
1954	-	0	35	L3	-	-	5.83	-	-
1955	1,480	0	35	L3	42	-	6.08	-	257
1956	3,602	0	35	L3	103	-	6.33	-	651
1957	814	0	35	L3	23	-	6.58	-	153
1958	199	0	35	L3	6	-	6.83	-	39
1959	500	0	35	L3	14	-	7.09	-	101
1960	488	0	35	L3	14	-	7.35	-	102
1961	1,719	0	35	L3	49	-	7.61	-	374
1962	-	0	35	L3	-	-	7.87	-	-
1963	-	0	35	L3	-	-	8.13	-	-
1964	264	0	35	L3	8	-	8.38	-	63
1965	-	0	35	L3	-	-	8.63	-	-
1966	4,386	0	35	L3	125	-	8.87	-	1,112
1967	2,857	0	35	L3	82	-	9.11	-	743
1968	798	0	35	L3	23	-	9.33	-	213
1969	64	0	35	L3	2	-	9.54	-	17
1970	19,796	0	35	L3	566	-	9.74	-	5,506
1971	1,439	0	35	L3	41	-	9.92	-	408

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002

375 -- Distribution Structures and Improvements

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1972	366	0	35	L3	10	-	10.10	-	106
1973	-	0	35	L3	-	-	10.27	-	-
1974	298	0	35	L3	9	-	10.43	-	89
1975	414	0	35	L3	12	-	10.60	-	125
1976	4,664	0	35	L3	133	-	10.77	-	1,436
1977	16,625	0	35	L3	475	-	10.96	-	5,206
1978	-	0	35	L3	-	-	11.17	-	-
1979	2,354	0	35	L3	67	-	11.40	-	767
1980	572	0	35	L3	16	-	11.67	-	191
1981	1,270	0	35	L3	36	-	11.97	-	434
1982	-	0	35	L3	-	-	12.31	-	-
1983	734	0	35	L3	21	-	12.70	-	266
1984	-	0	35	L3	-	-	13.14	-	-
1985	9,863	0	35	L3	282	-	13.63	-	3,841
1986	6,484	0	35	L3	185	-	14.17	-	2,625
1987	-	0	35	L3	-	-	14.77	-	-
1988	5,063	0	35	L3	145	-	15.41	-	2,229
1989	2,806	0	35	L3	80	-	16.10	-	1,291
1990	779	0	35	L3	22	-	16.84	-	375
1991	-	0	35	L3	-	-	17.61	-	-
1992	7,442	0	35	L3	213	-	18.42	-	3,916
1993	3,144	0	35	L3	90	-	19.25	-	1,729
1994	-	0	35	L3	-	-	20.11	-	-
1995	12,893	0	35	L3	368	-	20.98	-	7,729
1996	3,942	0	35	L3	113	-	21.88	-	2,464
1997	4,101	0	35	L3	117	-	22.78	-	2,670
1998	2,265	0	35	L3	65	-	23.71	-	1,534
1999	3,538	0	35	L3	101	-	24.65	-	2,491
2000	-	0	35	L3	-	-	25.60	-	-
2001	5,172	0	35	L3	148	-	26.56	-	3,925
2002	2,756	0	35	L3	79	-	27.53	-	2,168
2003	2,624	0	35	L3	75	-	28.52	-	2,138
2004	2,883	0	35	L3	82	-	29.51	-	2,430



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 376 -- Distribution Mains

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	58,962	0	34	R2	1,734	-	-	-	-
1941	-	0	34	R2	-	-	-	-	-
1942	-	0	34	R2	-	-	-	-	-
1943	-	0	34	R2	-	-	-	-	-
1944	-	0	34	R2	-	-	-	-	-
1945	-	0	34	R2	-	-	-	-	-
1946	-	0	34	R2	-	-	0.50	-	-
1947	75,766	0	34	R2	2,228	-	0.50	-	1,114
1948	67,865	0	34	R2	1,996	-	0.56	-	1,126
1949	62,008	0	34	R2	1,824	-	0.77	-	1,400
1950	29,854	0	34	R2	878	-	1.01	-	883
1951	36,626	0	34	R2	1,077	-	1.26	-	1,357
1952	18,609	0	34	R2	547	-	1.52	-	834
1953	12,981	0	34	R2	382	-	1.80	-	686
1954	47,353	0	34	R2	1,393	-	2.07	-	2,889
1955	148,499	0	34	R2	4,368	-	2.36	-	10,292
1956	143,937	0	34	R2	4,233	-	2.64	-	11,184
1957	39,727	0	34	R2	1,168	-	2.93	-	3,422
1958	34,326	0	34	R2	1,010	-	3.22	-	3,248
1959	106,509	0	34	R2	3,133	-	3.51	-	10,986
1960	69,660	0	34	R2	2,049	-	3.80	-	7,781
1961	110,606	0	34	R2	3,253	-	4.09	-	13,308
1962	71,538	0	34	R2	2,104	-	4.39	-	9,231
1963	86,884	0	34	R2	2,555	-	4.69	-	11,980
1964	89,514	0	34	R2	2,633	-	5.00	-	13,152
1965	123,728	0	34	R2	3,639	-	5.31	-	19,325
1966	135,264	0	34	R2	3,978	-	5.63	-	22,418
1967	317,430	0	34	R2	9,336	-	5.97	-	55,741
1968	182,038	0	34	R2	5,354	-	6.32	-	33,827
1969	582,335	0	34	R2	17,128	-	6.68	-	114,398
1970	1,455,571	0	34	R2	42,811	-	7.05	-	302,022
1971	1,074,050	0	34	R2	31,590	-	7.45	-	235,207
1972	324,850	0	34	R2	9,554	-	7.85	-	75,027
1973	448,840	0	34	R2	13,201	-	8.28	-	109,254
1974	294,232	0	34	R2	8,654	-	8.72	-	75,432
1975	409,344	0	34	R2	12,040	-	9.17	-	110,455
1976	201,118	0	34	R2	5,915	-	9.65	-	57,080
1977	215,318	0	34	R2	6,333	-	10.14	-	64,231
1978	316,671	0	34	R2	9,314	-	10.65	-	99,220



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 376 -- Distribution Mains

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1979	723,822	0	34	R2	21,289	-	11.18	-	238,028
1980	646,465	0	34	R2	19,014	-	11.73	-	222,956
1981	1,960,024	0	34	R2	57,648	-	12.29	-	708,402
1982	1,666,448	0	34	R2	49,013	-	12.87	-	630,683
1983	1,579,871	0	34	R2	46,467	-	13.46	-	625,596
1984	1,436,971	0	34	R2	42,264	-	14.08	-	594,871
1985	1,581,605	0	34	R2	46,518	-	15.35	-	683,943
1986	1,840,623	0	34	R2	54,136	-	16.00	-	830,766
1987	1,938,634	0	34	R2	57,019	-	16.68	-	912,529
1988	2,392,247	0	34	R2	70,360	-	17.36	-	1,173,382
1989	2,519,548	0	34	R2	74,104	-	18.06	-	1,286,730
1990	2,464,496	0	34	R2	72,485	-	18.78	-	1,309,414
1991	3,124,355	0	34	R2	91,893	-	19.51	-	1,725,641
1992	2,153,634	0	34	R2	63,342	-	20.25	-	1,235,564
1993	2,518,971	0	34	R2	74,087	-	21.00	-	1,499,990
1994	2,398,105	0	34	R2	70,533	-	21.76	-	1,481,086
1995	3,191,099	0	34	R2	93,856	-	22.54	-	2,042,589
1996	2,627,094	0	34	R2	77,267	-	23.33	7.45	1,741,541
1997	2,772,515	1000	34	R2	81,545	29	24.12	-	1,902,372
1998	4,460,035	0	34	R2	131,178	-	24.93	-	3,164,656
1999	3,295,415	0	34	R2	96,924	-	25.75	-	2,416,718
2000	3,191,898	0	34	R2	93,879	-	26.58	-	2,417,744
2001	1,634,379	6556	34	R2	48,070	193	27.42	24.93	1,282,672
2002	1,118,713	0	34	R2	32,903	-	28.27	-	902,304
2003	1,493,803	0	34	R2	43,935	-	29.13	-	1,242,135
2004	1,866,444	0	34	R2	54,895	-	30.00	-	1,599,104
2005	1,634,459	0	34	R2	48,072	-	30.87	-	1,442,028
2006	1,344,632	0	34	R2	39,548	-	31.76	-	1,220,952
2007	1,099,901	0	34	R2	32,350	-	32.65	-	1,027,324
2008	2,210,012	0	34	R2	65,000	-	33.55	-	2,122,153
2009	1,821,352	0	34	R2	53,569	-	20.26	-	1,797,127
	72,099,583	7,556			2,120,576	222			42,959,510

Average Remaining Life

20.3

Survivor Curve  
ASL

R2  
34



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002

378 -- Measuring Regulating Equipment - General

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	110	0	30	L0	4	-	8.37	-	31
1941	-	0	30	L0	-	-	8.54	-	-
1942	-	0	30	L0	-	-	8.72	-	-
1943	-	0	30	L0	-	-	8.89	-	-
1944	-	0	30	L0	-	-	9.07	-	-
1945	-	0	30	L0	-	-	9.25	-	-
1946	-	0	30	L0	-	-	9.43	-	-
1947	-	0	30	L0	-	-	9.62	-	-
1948	260	0	30	L0	9	-	9.81	-	85
1949	97	0	30	L0	3	-	9.99	-	32
1950	202	0	30	L0	7	-	10.19	-	69
1951	535	0	30	L0	18	-	10.38	-	185
1952	904	0	30	L0	30	-	10.58	-	319
1953	789	0	30	L0	26	-	10.78	-	283
1954	38	0	30	L0	1	-	10.98	-	14
1955	5,199	0	30	L0	173	-	11.18	-	1,938
1956	3,855	0	30	L0	129	-	11.39	-	1,464
1957	1,094	0	30	L0	36	-	11.60	-	423
1958	-	0	30	L0	-	-	11.82	-	-
1959	12,372	0	30	L0	412	-	12.03	-	4,962
1960	-	0	30	L0	-	-	12.25	-	-
1961	-	0	30	L0	-	-	12.47	-	-
1962	321	0	30	L0	11	-	12.70	-	136
1963	-	0	30	L0	-	-	12.93	-	-
1964	608	0	30	L0	20	-	13.16	-	267
1965	881	0	30	L0	29	-	13.40	-	393
1966	5,272	0	30	L0	176	-	13.63	-	2,396
1967	-	0	30	L0	-	-	13.88	-	-
1968	317	0	30	L0	11	-	14.12	-	149
1969	281	0	30	L0	9	-	14.37	-	135
1970	23,330	0	30	L0	778	-	14.62	-	11,373
1971	24,948	0	30	L0	832	-	14.88	-	12,376
1972	13,981	0	30	L0	466	-	15.14	-	7,057
1973	3,975	0	30	L0	133	-	15.41	-	2,041
1974	5,207	0	30	L0	174	-	15.68	-	2,721
1975	6,244	0	30	L0	208	-	15.95	-	3,320
1976	3,610	0	30	L0	120	-	16.23	-	1,953
1977	8,552	0	30	L0	285	-	16.51	-	4,706
1978	7,190	0	30	L0	240	-	16.80	-	4,025
1979	9,000	0	30	L0	300	-	17.09	-	5,126



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002

379 -- Measuring Regulating Station Equipment -- City Gate

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	-	0	40	R1	-	-	3.51	-	-
1941	-	0	40	R1	-	-	3.80	-	-
1942	-	0	40	R1	-	-	4.10	-	-
1943	-	0	40	R1	-	-	4.41	-	-
1944	-	0	40	R1	-	-	4.71	-	-
1945	-	0	40	R1	-	-	5.03	-	-
1946	-	0	40	R1	-	-	5.35	-	-
1947	-	0	40	R1	-	-	5.67	-	-
1948	-	0	40	R1	-	-	6.00	-	-
1949	-	0	40	R1	-	-	6.33	-	-
1950	626	0	40	R1	16	-	6.68	-	104
1951	498	0	40	R1	12	-	7.02	-	87
1952	-	0	40	R1	-	-	7.38	-	-
1953	-	0	40	R1	-	-	7.74	-	-
1954	424	0	40	R1	11	-	8.10	-	86
1955	4,368	0	40	R1	109	-	8.48	-	925
1956	6,252	0	40	R1	156	-	8.85	-	1,384
1957	2,928	0	40	R1	73	-	9.24	-	676
1958	415	0	40	R1	10	-	9.63	-	100
1959	1,136	0	40	R1	28	-	10.03	-	285
1960	5,188	0	40	R1	130	-	10.44	-	1,354
1961	729	0	40	R1	18	-	10.86	-	198
1962	103	0	40	R1	3	-	11.28	-	29
1963	-	0	40	R1	-	-	11.71	-	-
1964	118	0	40	R1	3	-	12.14	-	36
1965	185	0	40	R1	5	-	12.59	-	58
1966	10,334	0	40	R1	258	-	13.04	-	3,369
1967	1,607	0	40	R1	40	-	13.50	-	543
1968	13	0	40	R1	0	-	13.97	-	5
1969	1,756	0	40	R1	44	-	14.45	-	634
1970	6,102	0	40	R1	153	-	14.94	-	2,279

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002

379 -- Measuring Regulating Station Equipment -- City Gate

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1971	-	0	40	R1	-	-	15.43	-	-
1972	-	0	40	R1	-	-	15.93	-	-
1973	-	0	40	R1	-	-	16.45	-	-
1974	1,289	0	40	R1	32	-	16.97	-	547
1975	-	0	40	R1	-	-	17.50	-	-
1976	1,180	0	40	R1	30	-	18.03	-	532
1977	9,218	0	40	R1	230	-	18.58	-	4,282
1978	1,634	0	40	R1	41	-	19.13	-	782
1979	32,008	0	40	R1	800	-	19.70	-	15,763
1980	43,580	0	40	R1	1,090	-	20.27	-	22,086
1981	10,544	0	40	R1	264	-	20.85	-	5,497
1982	-	0	40	R1	-	-	21.44	-	-
1983	14,039	0	40	R1	351	-	22.04	-	7,735
1984	13,765	0	40	R1	344	-	22.65	-	7,793
1985	69,107	0	40	R1	1,728	-	23.26	-	40,184
1986	29,155	0	40	R1	729	-	23.88	-	17,405
1987	41,206	0	40	R1	1,030	-	24.51	-	25,247
1988	-	0	40	R1	-	-	25.14	-	-
1989	-	0	40	R1	-	-	25.78	-	-
1990	-	0	40	R1	-	-	26.43	-	-
1991	33,855	0	40	R1	846	-	27.09	-	22,926
1992	8,924	0	40	R1	223	-	27.75	-	6,190
1993	19,002	0	40	R1	475	-	28.41	-	13,497
1994	37,494	0	40	R1	937	-	29.08	-	27,258
1995	13,865	0	40	R1	347	-	29.75	-	10,313
1996	-	0	40	R1	-	-	30.43	-	-
1997	2,853	0	40	R1	71	-	31.11	-	2,219
1998	-	0	40	R1	-	-	31.80	-	-
1999	14,844	0	40	R1	371	-	32.49	-	12,056
2000	-	0	40	R1	-	-	33.18	-	-
2001	-	0	40	R1	-	-	33.88	-	-
2002	13,763	0	40	R1	344	-	34.58	-	11,898

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002

379 -- Measuring Regulating Station Equipment -- City Gate

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
2003	-	0	40	R1	-	-	35.29	-	-
2004	79,594	0	40	R1	1,990	-	36.00	-	71,628
2005	19,922	0	40	R1	498	-	36.71	-	18,285
2006	17,058	0	40	R1	426	-	37.43	-	15,963
2007	-	0	40	R1	-	-	38.16	-	-
2008	-	0	40	R1	-	-	38.89	-	-
2009	25,045	0	40	R1	626	-	39.63	-	24,813
	595,726	-			14,893	-	26.66		397,051

Average Remaining Life

26.7

Survivor Curve  
ASL

R1  
40





Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 381 -- Meters

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1979	53,560	0	36	S4	1,488	-	7.65	-	11,374
1980	69,898	0	36	S4	1,942	-	8.25	-	16,021
1981	92,069	0	36	S4	2,557	-	8.90	-	22,771
1982	195,244	0	36	S4	5,423	-	9.60	-	52,071
1983	125,587	0	36	S4	3,489	-	10.34	-	36,085
1984	147,259	0	36	S4	4,091	-	11.13	-	45,527
1985	82,296	0	36	S4	2,286	-	11.96	-	27,333
1986	81,339	0	36	S4	2,259	-	12.82	-	28,967
1987	125,529	0	36	S4	3,487	-	13.72	-	47,831
1988	216,913	0	36	S4	6,025	-	14.64	-	88,219
1989	86,154	0	36	S4	2,393	-	15.59	-	37,305
1990	195,258	0	36	S4	5,424	-	16.55	-	89,776
1991	142,091	0	36	S4	3,947	-	17.53	-	69,187
1992	105,207	6585	36	S4	2,922	183	18.52	-	54,110
1993	281,873	0	36	S4	7,830	-	19.51	-	152,740
1994	239,405	0	36	S4	6,650	-	20.50	-	136,350
1995	297,778	0	36	S4	8,272	-	21.50	-	177,851
1996	1,004,419	0	36	S4	27,901	-	22.50	-	627,776
1997	94,368	0	36	S4	2,621	-	23.50	-	61,602
1998	828,908	0	36	S4	23,025	-	24.50	-	564,119
1999	221,392	0	36	S4	6,150	-	25.50	-	156,819
2000	203,319	0	36	S4	5,648	-	26.50	-	149,665
2001	408,435	0	36	S4	11,345	-	27.50	-	311,999
2002	577,827	0	36	S4	16,051	-	28.50	-	457,447
2003	1,828,445	0	36	S4	50,790	-	29.50	-	1,498,310
2004	92,829	0	36	S4	2,579	-	30.50	-	78,647
2005	215,473	0	36	S4	5,985	-	31.50	-	188,539
2006	225,642	0	36	S4	6,268	-	32.50	-	203,705
2007	275,722	0	36	S4	7,659	-	33.50	-	256,575
2008	149,376	0	36	S4	4,149	-	34.50	-	143,152
2009	82,941	0	36	S4	2,304	-	35.50	-	81,790
	10,152,490	6,585			282,014	183	21.38		6,030,497

Average Remaining Life

21.4

Survivor Curve  
ASL

S4  
36

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 382 -- Meter Regulator Installation

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	386	0	32	S1	12	-	-	-	-
1941	-	0	32	S1	-	-	-	-	-
1942	-	0	32	S1	-	-	-	-	-
1943	-	0	32	S1	-	-	-	-	-
1944	-	0	32	S1	-	-	-	-	-
1945	-	0	32	S1	-	-	0.50	-	-
1946	-	0	32	S1	-	-	0.50	-	-
1947	291	0	32	S1	9	-	0.55	-	5
1948	543	0	32	S1	17	-	0.75	-	13
1949	1,057	0	32	S1	33	-	0.99	-	33
1950	1,120	0	32	S1	35	-	1.25	-	44
1951	1,784	0	32	S1	56	-	1.51	-	84
1952	293	0	32	S1	9	-	1.78	-	16
1953	394	0	32	S1	12	-	2.06	-	25
1954	1,666	0	32	S1	52	-	2.34	-	122
1955	2,929	0	32	S1	92	-	2.62	-	240
1956	8,754	0	32	S1	274	-	2.91	-	796
1957	8,202	0	32	S1	256	-	3.20	-	820
1958	6,222	0	32	S1	194	-	3.49	-	679
1959	4,846	0	32	S1	151	-	3.79	-	574
1960	3,986	0	32	S1	125	-	4.09	-	510
1961	3,306	0	32	S1	103	-	4.40	-	455
1962	9,394	0	32	S1	294	-	4.71	-	1,384
1963	1,800	0	32	S1	56	-	5.03	-	283
1964	1,800	0	32	S1	56	-	5.35	-	301
1965	2,280	0	32	S1	71	-	5.68	-	404
1966	2,098	0	32	S1	65	-	6.01	-	392
1967	4,152	0	32	S1	130	-	6.34	-	823
1968	5,823	0	32	S1	182	-	6.69	-	1,217
1969	8,651	0	32	S1	270	-	7.03	-	1,901
1970	8,413	0	32	S1	263	-	7.39	-	1,942
1971	6,017	0	32	S1	188	-	7.75	-	1,457
1972	6,795	0	32	S1	212	-	8.12	-	1,724
1973	8,877	0	32	S1	277	-	8.49	-	2,356
1974	5,641	0	32	S1	176	-	8.87	-	1,564
1975	4,065	0	32	S1	127	-	9.26	-	1,177
1976	2,843	0	32	S1	89	-	9.66	-	859
1977	2,209	0	32	S1	69	-	10.07	-	695
1978	1,604	0	32	S1	50	-	10.49	-	526

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 382 -- Meter Regulator Installation

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1979	4,463	0	32	S1	139	-	10.91	-	1,522
1980	5,200	0	32	S1	163	-	11.35	-	1,844
1981	12,046	0	32	S1	376	-	11.80	-	4,441
1982	66,540	0	32	S1	2,079	-	12.26	-	25,486
1983	99,610	0	32	S1	3,113	-	12.73	-	39,617
1984	94,296	0	32	S1	2,947	-	13.21	-	38,926
1985	67,324	0	32	S1	2,104	-	13.71	-	28,836
1986	69,688	0	32	S1	2,178	-	14.22	-	30,959
1987	60,219	0	32	S1	1,882	-	14.74	-	27,740
1988	71,400	0	32	S1	2,231	-	15.28	-	34,095
1989	89,262	296,457	32	S1	2,789	9,264	15.84	-	44,175
1990	147,697	0	32	S1	4,616	-	16.41	-	75,740
1991	118,996	0	32	S1	3,719	-	17.00	-	63,219
1992	170,332	0	32	S1	5,323	-	17.61	-	93,738
1993	142,352	0	32	S1	4,449	-	18.24	-	81,139
1994	160,617	0	32	S1	5,019	-	18.89	-	94,812
1995	148,177	0	32	S1	4,631	-	19.56	-	90,577
1996	150,837	0	32	S1	4,714	-	20.25	-	95,473
1997	149,850	0	32	S1	4,683	-	20.97	-	98,206
1998	172,095	0	32	S1	5,378	-	21.71	-	116,770
1999	155,766	0	32	S1	4,868	-	22.48	-	109,419
2000	122,090	0	32	S1	3,815	-	23.27	-	88,782
2001	98,891	0	32	S1	3,090	-	24.09	-	74,438
2002	93,543	0	32	S1	2,923	-	24.93	-	72,878
2003	102,667	0	32	S1	3,208	-	25.80	-	82,777
2004	112,534	0	32	S1	3,517	-	26.70	-	93,882
2005	110,798	0	32	S1	3,462	-	27.62	-	95,620
2006	82,818	0	32	S1	2,588	-	28.56	-	73,914
2007	90,410	0	32	S1	2,825	-	29.52	-	83,415
2008	68,713	0	32	S1	2,147	-	30.51	-	65,505
2009	54,832	0	32	S1	1,714	-	31.50	-	53,976
	3,222,294	296,457			100,697	9,264	19.91		2,005,342
									18.2

Average Remaining Life

Survivor Curve  
ASL

S1  
32



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 383 -- House Regulators

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	563	0	30	S0	19	-	-	-	-
1941	-	0	30	S0	-	-	-	-	-
1942	-	0	30	S0	-	-	-	-	-
1943	-	0	30	S0	-	-	-	-	-
1944	-	0	30	S0	-	-	-	-	-
1945	-	0	30	S0	-	-	-	-	-
1946	-	0	30	S0	-	-	-	-	-
1947	6,423	0	30	S0	214	-	-	-	-
1948	560	0	30	S0	19	-	-	-	-
1949	508	0	30	S0	17	-	0.50	-	8
1950	1,192	0	30	S0	40	-	0.50	-	20
1951	3,347	0	30	S0	112	-	0.65	-	72
1952	1,274	0	30	S0	42	-	0.97	-	41
1953	1,063	0	30	S0	35	-	1.32	-	47
1954	1,689	0	30	S0	56	-	1.69	-	95
1955	4,186	0	30	S0	140	-	2.05	-	286
1956	8,755	0	30	S0	292	-	2.42	-	707
1957	6,486	0	30	S0	216	-	2.79	-	604
1958	4,537	0	30	S0	151	-	3.17	-	479
1959	4,836	0	30	S0	161	-	3.55	-	572
1960	5,466	0	30	S0	182	-	3.93	-	716
1961	10,139	0	30	S0	338	-	4.31	-	1,457
1962	4,564	0	30	S0	152	-	4.70	-	715
1963	8,161	0	30	S0	272	-	5.08	-	1,383
1964	5,251	0	30	S0	175	-	5.48	-	958
1965	9,372	0	30	S0	312	-	5.87	-	1,833
1966	5,883	0	30	S0	196	-	6.26	-	1,228
1967	8,100	0	30	S0	270	-	6.66	-	1,799
1968	10,199	0	30	S0	340	-	7.06	-	2,402
1969	15,644	0	30	S0	521	-	7.47	-	3,895
1970	15,245	0	30	S0	508	-	7.88	-	4,003
1971	44,148	0	30	S0	1,472	-	8.29	-	12,196
1972	18,706	0	30	S0	624	-	8.70	-	5,426
1973	18,408	0	30	S0	614	-	9.12	-	5,596
1974	29,340	0	30	S0	978	-	9.54	-	9,331
1975	12,375	0	30	S0	413	-	9.97	-	4,111
1976	18,467	0	30	S0	616	-	10.40	-	6,399
1977	29,083	0	30	S0	969	-	10.83	-	10,497
1978	20,730	0	30	S0	691	-	11.27	-	7,785



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 383 -- House Regulators

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1979	17,688	0	30	S0	590	-	11.71	-	6,903
1980	44,258	0	30	S0	1,475	-	12.16	-	17,932
1981	46,611	0	30	S0	1,554	-	12.61	-	19,588
1982	62,018	0	30	S0	2,067	-	13.06	-	27,008
1983	79,203	0	30	S0	2,640	-	13.53	-	35,714
1984	68,536	0	30	S0	2,285	-	14.00	-	31,975
1985	82,809	0	30	S0	2,760	-	14.47	-	39,945
1986	45,980	0	30	S0	1,533	-	14.95	-	22,918
1987	107,385	3463	30	S0	3,580	115	15.44	-	55,271
1988	84,581	0	30	S0	2,819	-	15.94	-	44,931
1989	114,666	0	30	S0	3,822	-	16.44	-	62,837
1990	112,102	0	30	S0	3,737	-	16.95	-	63,344
1991	63,398	0	30	S0	2,113	-	17.47	-	36,923
1992	95,099	0	30	S0	3,170	-	18.00	-	57,064
1993	152,812	0	30	S0	5,094	-	18.54	-	94,443
1994	115,494	0	30	S0	3,850	-	19.09	-	73,497
1995	126,610	0	30	S0	4,220	-	19.65	-	82,941
1996	114,577	0	30	S0	3,819	-	20.23	-	77,250
1997	85,933	0	30	S0	2,864	-	20.81	-	59,619
1998	340,732	295	30	S0	11,358	10	21.41	15.94	243,379
1999	161,756	0	30	S0	5,392	-	22.03	-	118,790
2000	136,617	0	30	S0	4,554	-	22.66	-	103,214
2001	84,144	0	30	S0	2,805	-	23.32	-	65,399
2002	114,466	0	30	S0	3,816	-	23.99	-	91,531
2003	108,820	0	30	S0	3,627	-	24.68	-	89,535
2004	115,491	0	30	S0	3,850	-	25.40	-	97,792
2005	142,384	0	30	S0	4,746	-	26.15	-	124,109
2006	181,209	0	30	S0	6,040	-	26.93	-	162,656
2007	223,326	0	30	S0	7,444	-	27.74	-	206,530
2008	161,646	0	30	S0	5,388	-	28.60	-	154,115
2009	98,027	0	30	S0	3,268	-	29.52	-	96,443
	3,823,077	3,758			127,436	125	20.00		2,548,257

Average Remaining Life

20.0

Survivor Curve  
ASL

S0  
30

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 385 -- Industrial Meter Sets

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	-	0	40	L0	-	-	15.57	-	-
1941	-	0	40	L0	-	-	15.79	-	-
1942	-	0	40	L0	-	-	16.00	-	-
1943	-	0	40	L0	-	-	16.22	-	-
1944	-	0	40	L0	-	-	16.44	-	-
1945	-	0	40	L0	-	-	16.67	-	-
1946	-	0	40	L0	-	-	16.89	-	-
1947	-	0	40	L0	-	-	17.12	-	-
1948	-	0	40	L0	-	-	17.35	-	-
1949	-	0	40	L0	-	-	17.58	-	-
1950	-	0	40	L0	-	-	17.82	-	-
1951	-	0	40	L0	-	-	18.06	-	-
1952	-	0	40	L0	-	-	18.30	-	-
1953	-	0	40	L0	-	-	18.54	-	-
1954	-	0	40	L0	-	-	18.79	-	-
1955	-	0	40	L0	-	-	19.03	-	-
1956	702	0	40	L0	18	-	19.29	-	338
1957	1,860	0	40	L0	47	-	19.54	-	909
1958	1,172	0	40	L0	29	-	19.80	-	580
1959	366	0	40	L0	9	-	20.06	-	184
1960	1,596	0	40	L0	40	-	20.32	-	811
1961	941	0	40	L0	24	-	20.59	-	484
1962	168	0	40	L0	4	-	20.85	-	88
1963	1,767	0	40	L0	44	-	21.13	-	933
1964	308	0	40	L0	8	-	21.40	-	165
1965	1,098	0	40	L0	27	-	21.68	-	595
1966	1,847	0	40	L0	46	-	21.96	-	1,014
1967	2,885	0	40	L0	72	-	22.25	-	1,605
1968	2,179	0	40	L0	54	-	22.54	-	1,228
1969	1,759	0	40	L0	44	-	22.83	-	1,004
1970	3,485	0	40	L0	87	-	23.13	-	2,015
1971	3,084	0	40	L0	77	-	23.42	-	1,806
1972	2,554	0	40	L0	64	-	23.73	-	1,515
1973	3,174	0	40	L0	79	-	24.03	-	1,907
1974	2,543	0	40	L0	64	-	24.34	-	1,548
1975	1,682	0	40	L0	42	-	24.66	-	1,037
1976	6,518	0	40	L0	163	-	24.98	-	4,070
1977	-	0	40	L0	-	-	25.30	-	-
1978	4,035	0	40	L0	101	-	25.63	-	2,585
1979	3,969	0	40	L0	99	-	25.96	-	2,576

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 385 -- Industrial Meter Sets

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1980	4,307	0	40	L0	108	-	26.29	-	2,831
1981	33,109	0	40	L0	828	-	26.63	-	22,042
1982	19,688	0	40	L0	492	-	26.97	-	13,276
1983	17,371	0	40	L0	434	-	27.32	-	11,864
1984	26,528	0	40	L0	663	-	27.67	-	18,352
1985	39,740	0	40	L0	994	-	28.03	-	27,846
1986	70,515	0	40	L0	1,763	-	28.39	-	50,047
1987	58,538	0	40	L0	1,463	-	28.75	-	42,081
1988	109,462	0	40	L0	2,737	-	29.13	-	79,703
1989	141,310	0	40	L0	3,533	-	29.50	-	104,217
1990	98,320	0	40	L0	2,458	-	29.88	-	73,446
1991	71,191	0	40	L0	1,780	-	30.27	-	53,866
1992	42,672	0	40	L0	1,067	-	30.66	-	32,705
1993	79,131	0	40	L0	1,978	-	31.06	-	61,438
1994	89,330	0	40	L0	2,233	-	31.46	-	70,265
1995	89,881	0	40	L0	2,247	-	31.88	-	71,634
1996	72,772	0	40	L0	1,819	-	32.31	-	58,774
1997	57,974	0	40	L0	1,449	-	32.74	-	47,457
1998	91,757	0	40	L0	2,294	-	33.19	-	76,144
1999	60,714	0	40	L0	1,518	-	33.66	-	51,087
2000	54,409	0	40	L0	1,360	-	34.14	-	46,432
2001	70,925	0	40	L0	1,773	-	34.63	-	61,405
2002	13,368	0	40	L0	334	-	35.14	-	11,745
2003	54,587	0	40	L0	1,365	-	35.68	-	48,690
2004	53,260	0	40	L0	1,332	-	36.24	-	48,248
2005	31,213	0	40	L0	780	-	36.82	-	28,732
2006	51,486	0	40	L0	1,287	-	37.44	-	48,186
2007	24,432	0	40	L0	611	-	38.09	-	23,265
2008	51,360	0	40	L0	1,284	-	38.79	-	49,811
2009	11,085	0	40	L0	277	-	39.57	-	10,965
	1,740,127	-			43,503	-	31.62		1,375,550

Average Remaining Life

31.6

Survivor Curve  
ASL

L0  
40

Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002  
 390 -- General Plant Structures and Improvements

Year	Additions	Transfers	ASL	Survivor Curve	Annual Accrual of Additions	Annual Accrual of Transfers	Remaining Life of Additions	Remaining Life of Transfers	Avg Future Accruals
1940	-	0	35	L0	-	-	11.87	-	-
1941	-	0	35	L0	-	-	12.06	-	-
1942	-	0	35	L0	-	-	12.26	-	-
1943	-	0	35	L0	-	-	12.46	-	-
1944	-	0	35	L0	-	-	12.66	-	-
1945	-	0	35	L0	-	-	12.86	-	-
1946	-	0	35	L0	-	-	13.06	-	-
1947	-	0	35	L0	-	-	13.27	-	-
1948	-	0	35	L0	-	-	13.48	-	-
1949	-	0	35	L0	-	-	13.69	-	-
1950	-	0	35	L0	-	-	13.91	-	-
1951	-	0	35	L0	-	-	14.13	-	-
1952	-	0	35	L0	-	-	14.35	-	-
1953	-	0	35	L0	-	-	14.57	-	-
1954	-	0	35	L0	-	-	14.80	-	-
1955	-	0	35	L0	-	-	15.02	-	-
1956	-	0	35	L0	-	-	15.25	-	-
1957	-	0	35	L0	-	-	15.49	-	-
1958	20,586	0	35	L0	588	-	15.73	-	9,249
1959	27,726	0	35	L0	792	-	15.97	-	12,647
1960	250	0	35	L0	7	-	16.21	-	116
1961	832	0	35	L0	24	-	16.45	-	391
1962	1,197	0	35	L0	34	-	16.70	-	571
1963	23,367	0	35	L0	668	-	16.95	-	11,319
1964	357	0	35	L0	10	-	17.21	-	176
1965	10,712	0	35	L0	306	-	17.47	-	5,346
1966	24,179	0	35	L0	691	-	17.73	-	12,249
1967	149	0	35	L0	4	-	18.00	-	77
1968	3,179	0	35	L0	91	-	18.27	-	1,659
1969	94	0	35	L0	3	-	18.54	-	50
1970	37,380	0	35	L0	1,068	-	18.81	-	20,094
1971	29,546	0	35	L0	844	-	19.09	-	16,119
1972	11,406	0	35	L0	326	-	19.38	-	6,315
1973	84,336	0	35	L0	2,410	-	19.67	-	47,388
1974	480	0	35	L0	14	-	19.96	-	274
1975	700	0	35	L0	20	-	20.25	-	405
1976	2,119	0	35	L0	61	-	20.55	-	1,244
1977	1,374	0	35	L0	39	-	20.86	-	819
1978	568,930	0	35	L0	16,255	-	21.17	-	344,058



Delta Natural Gas Company  
 Depreciation Study  
 As of June 30, 2002

390 -- General Plant Structures and Improvements

1979	23,860	0	35	L0	682	-	21.48	-	14,642
1980	58,518	0	35	L0	1,672	-	21.80	-	36,442
1981	253,709	0	35	L0	7,249	-	22.12	-	160,326
1982	171,370	0	35	L0	4,896	-	22.44	-	109,891
1983	79,384	0	35	L0	2,268	-	22.77	-	51,656
1984	176,763	0	35	L0	5,050	-	23.11	-	116,716
1985	138,267	0	35	L0	3,950	-	23.45	-	92,643
1986	79,344	0	35	L0	2,267	-	23.80	-	53,946
1987	21,786	0	35	L0	622	-	24.15	-	15,031
1988	9,828	0	35	L0	281	-	24.50	-	6,880
1989	158,943	0	35	L0	4,541	-	24.86	-	112,912
1990	247,667	0	35	L0	7,076	-	25.23	-	178,533
1991	910	0	35	L0	26	-	25.60	-	666
1992	26,100	0	35	L0	746	-	25.98	-	19,373
1993	115,754	0	35	L0	3,307	-	26.36	-	87,186
1994	525,596	0	35	L0	15,017	-	26.75	-	401,731
1995	62,193	0	35	L0	1,777	-	27.15	-	48,243
1996	150,022	0	35	L0	4,286	-	27.56	-	118,116
1997	11,853	0	35	L0	339	-	27.97	-	9,474
1998	33,458	0	35	L0	956	-	28.40	-	27,152
1999	310,970	0	35	L0	8,885	-	28.85	-	256,297
2000	21,039	0	35	L0	601	-	29.30	-	17,615
2001	41,155	0	35	L0	1,176	-	29.78	-	35,015
2002	1,331,240	0	35	L0	38,035	-	30.27	-	1,151,371
2003	489,667	0	35	L0	13,990	-	30.78	-	430,691
2004	346,841	0	35	L0	9,910	-	31.32	-	310,391
2005	20,333	0	35	L0	581	-	31.89	-	18,524
2006	55,450	0	35	L0	1,584	-	32.48	-	51,464
2007	49,897	0	35	L0	1,426	-	33.12	-	47,217
2008	8,098	0	35	L0	231	-	33.81	-	7,823
2009	4,250	0	35	L0	121	-	34.57	-	4,198
	5,873,165	-			167,805	-	26.71	-	4,482,732

Average Remaining Life

27

Survivor Curve  
 ASL

L0  
 35