



Citizens Gas | Citizens Thermal | Citizens Resources
2020 N. Meridian St. | Indianapolis, IN | 46202-1393
www.citizensenergygroup.com

Jill A. Phillips
Manager, Rates & Regulatory Affairs
Office/Fax: (317) 927-4427
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November 24, 2015

Brenda A. Howe
Secretary of the Commission
Indiana Utility Regulatory Commission
101 West Washington St., Suite 1500 E
Indianapolis, IN 46204

Re: Thirty – Day Filing for Citizens Gas Pursuant to 170 IAC 1-6

Dear Ms. Howe:

In compliance with the Stipulation and Settlement Agreement in Cause No. 41605 ("Settlement Agreement"), Citizens Gas is requesting Commission approval of this Customer Benefit Distribution ("CBD") filing under the Commission's Thirty-Day Administrative Filing Procedures and Guidelines ("Guidelines") pursuant to 170 IAC 1-6 in order to be effective January 1, 2016. This filing is an allowable request under the Guidelines because it is a filing for which the Commission already has approved the procedure for the change. Notice of Citizens Gas' intent to make this filing was provided to the Office of the Utility Consumer Counselor on October 12, 2015.

Enclosed for review and approval by the Commission, please find the following:

Fifth Revised Page No. 503 Customer Benefit Distribution

Also enclosed are supporting schedules 1 through 3 and Exhibit A.

The Settlement Agreement established the CBD for the purposes of (1) distributing to Citizens Gas customers available funds from its unregulated businesses and affiliates or subsidiaries and (2) providing a means for Citizens Gas to recover certain agreed to FAS106 and FAS71 costs incurred by Citizens Gas.

The CBD filing shows the amount of available funds Citizens Gas received during the preceding fiscal year from unregulated businesses and affiliates or subsidiaries, and the net amount of those funds that Citizens Gas' management and its Board of Directors, by resolution, have determined will be provided for the benefit of gas customers through the CBD. The calculation of the CBD, based upon expected calendar year 2016 throughput to gas customers is provided on schedules 1 through 3.

Citizens Gas affirms that a notice regarding the filing in the form attached hereto as Exhibit A



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was published on November 20, 2015 in the Indianapolis Star, a newspaper of general circulation in the Indianapolis metro area, where the largest number of Citizens Gas customers is located. Citizens Gas also affirms that this notice has been posted on the Utility's website and in the Utility's customer service lobby.

Upon approval of the enclosed tariff sheet, please return one (1) file-marked and approved stamped copy of the tariff sheet to me for our files. Any questions concerning this submission should be directed to:

Jill A. Phillips
Manager, Rates & Regulatory Affairs
2020 N. Meridian Street
Indianapolis, IN 46202
Email: jphillips@citizensenergygroup.com
Phone/Fax: 317-927-4427

Sincerely,

/s/ Jill A. Phillips
Jill A. Phillips
Manager, Rates & Regulatory Affairs

Enclosures
cc: Office of the Utility Consumer Counselor

RIDER C

CUSTOMER BENEFIT DISTRIBUTION

The Delivery Charges specified in Gas Rate Nos. D1, D2, D3, D4, D5, D7 and D9 shall be adjusted from time to time in accordance with the Final Order of the Indiana Utility Regulatory Commission in Cause No. 41605 to reflect funds made available from the non-regulated activities of the Utility.

APPLICABLE RATE: \$ (0.0006) per Therm

Citizens Gas
2016 Customer Benefit Fund
Customer Benefit Distribution Calculation For Distribution During 2016

Schedule 1

1	Cash Available for Customer Benefit Policy Consideration at 9/30/15 (Sch. 2, In 12)	\$0
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Cash Used for Customer Benefit Policy

Uses FY2015

2	Philanthropy	\$1,035,000
3	Trust Image	\$1,284,000
4	FAS 106 Recovery - Gas Div. Expense	<u>\$410,000</u>
5	Total Uses (In 2 + In 3 + In 4)	\$2,729,000

Customer Benefit Policy Funds to Customers

6	FAS106 Matching	\$410,000
7	Additional Customer Benefit	<u>\$0</u>
8	Customer Benefit Policy Funds to Customers (In 6+In 7)	410,000
9	Total Cash Used by Customer Benefit Policy (In 5+In 8)	<u>3,139,000</u>
10	Cash Held for Long-Term Trust Needs (In1-In 9)	<u><u>\$0</u></u>

Customer Benefit Distribution Calculation
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11	Customer Benefit Policy Funds to Customers (In 8)	\$410,000
12	Undistributed Customer Benefit Funds at 12/31/14 (Sch. 3, In 3)	<u>(\$143,303)</u>
13	Total Funds to Customers (In 11+In 12)	\$266,697
14	Projected Sales for Calendar Year 2016	<u>44,850,294 Dth</u>
15	Customer Benefit Tracking Factor per Dth (In 13 / In 14)	<u><u>\$0.006 /Dth</u></u>

Citizens Gas
2016 Customer Benefit Fund
Cash Available for Customer Benefit Policy Consideration

Schedule 2

1	Citizens Resources (Parent) Cash Available at 10/1/14	3,643,497	
2	Chilled Water Division Cash Available at 10/1/14	<u>24,537,893</u>	
3	Total Non-regulated Cash Available at 10/1/14 (In 1 through In 3)		\$28,181,390
Cash Proceeds from Alliances/Affiliates			
Wholly Owned Subsidiaries and Non-Regulated Divisions			
Non-regulated Sources FY2015:			
4	Citizens Resources (Parent)	10,620,756	
5	Chilled Water	<u>11,186,466</u>	
6	Total Non-regulated Sources (In 4 + In 5)		21,807,222
Non-regulated Uses FY2015:			
7	Citizens Resources (Parent)	(12,025,256)	
8	Chilled Water	<u>(7,263,884)</u>	
9	Total Non-regulated Uses (In 7 + In 8)		<u>(19,289,140)</u>
10	Total Available Non-regulated Cash (In 3 + In 6 + In 9)		\$30,699,473
Funding Needs:			
11	Discontinued Operations Asset Retirement Obligation		46,382,000
12	Non-regulated Cash Available for Customer Benefit Policy Consideration @ 9/30/15 (In 10 - In 11)		<u><u>\$0</u></u>

Citizens Gas
2016 Customer Benefit Fund
Reconciliation of Calendar Year 2014

Schedule 3

1	Undistributed Customer Benefit funds as of 12/31/14	\$294,681
	Less: Total Customer Benefit funds provided in fiscal year	
2	2014 to be refunded to customers during calendar year 2015	<u>437,984</u>
	Variance of calendar year 2014 funds to be included in	
3	the 2016 Customer Benefit Distribution (ln 1 - ln 2)	<u><u>(\$143,303)</u></u>

EXHIBIT A

LEGAL NOTICE

PUBLIC NOTICE is hereby given that on or before November 25, 2015, the Board of Directors for Utilities (the "Board") of the Department of Public Utilities of the City of Indianapolis d/b/a Citizens Gas (the "Utility") intends to file with the Indiana Utility Regulatory Commission ("Commission") a proposed change to the Utility's Customer Benefit Distribution ("CBD"). The Customer Benefit Distribution is used to (1) distribute to the Utility's customers certain funds from the Board's unregulated affiliates or subsidiaries; and (2) provide a means for the Utility potentially to recover through a CBD credit mechanism certain FAS106 and FAS71 costs incurred by the Utility. The proposed CBD will be applicable to the Utility's customers served under Gas Rate Nos. D1, D2, D3, D4, D5, D7 and D9. Approval of the proposed CBD is expected no later than December 31, 2015. The proposed CBD, if approved by the Commission, will become effective January 1, 2016. This notice is provided to the public pursuant to 170 IAC 1-6-6. Contact information, to which an objection should be made, is as follows:

Secretary
Indiana Utility Regulatory Commission
PNC Center
101 West Washington Street
Suite 1500 E
Indianapolis, Indiana 46204
Telephone: (317) 232-2701
Facsimile: (317) 232-6758

Office of Utility Consumer Counselor
PNC Center
115 W. Washington St.
Suite 1500 South
Indianapolis, Indiana 46204
Telephone: (317) 232-2494
Toll Free: (888) 441-2494
Facsimile: (317) 232-5923

Date: November 18, 2015