

## Summary of 191 Account Audit Procedures and Results for CY 2012

### 1 SCOPE

The Division of Public Utilities conducted an audit of Questar Gas Company's Account No. 191.1 of the Uniform System of Accounts for the calendar year of 2012. The majority of the Division's work focused on net costs (costs offset by miscellaneous revenues) included in Account No. 191.1, although limited testing was performed on the reported revenues. The purpose of this audit was to compare the costs and revenues included in the Account No. 191.1 filing with the tariff and evaluate whether or not their calculation of the balance substantially conformed to the approved accounts and method of calculation.

### 2 DEFINITIONS

Various terms or abbreviations are used in the following sections. Those terms or abbreviations are described below:

- 1) "Division": Utah Division of Public Utilities
- 2) "QGC": Questar Gas Company
- 3) "QPC": Questar Pipeline Company
- 4) "ABS": Account Balance Summary. A spreadsheet consisting of individual accounting entries to the various accounts in the 191 account.
- 5) "GL": General Ledger or "Accounting Works". A QGC spreadsheet report produced monthly that originates from the Company's general ledger.
- 6) "191 SUM": The monthly 191 summary sheet produced by QGC. This sheet shows the 191 account calculations, including a breakdown by account, interest calculations and adjustments to the 191 account.
- 7) "191 Account": Account No. 191.1 of the Uniform System of Accounts

### 3 AUDIT PROCEDURES

The Division's audit procedures of the 191 Account for the calendar year 2012 consists of the following:

- 1) Risk Assessment – The Division reviewed the information provided by QGC to determine that it was substantially similar to previous years and relied upon risk areas that were identified in previous audits, particularly storage gas costs, which will be discussed later in this report.
- 2) High Level Reconciliations – Reconcile QGC's 10K report to the 191 SUM.
- 3) Net Gas Cost Review
  - a) Verify that the Commodity percentage was calculated correctly.
  - b) Verify that the Demand percentage was calculated correctly.

- c) Recalculate the ending 191 balance and compare to the 191 SUM.
  - d) Review supporting documentation for Wexpro costs.
  - e) Review supporting documentation for purchased gas costs.
  - f) Review supporting documentation for storage gas costs.
  - g) Review supporting documentation for gathering costs.
  - h) Review supporting documentation for transportation costs.
  - i) Review supporting documentation for overriding royalty revenues.
  - j) Review supporting documentation for the 191 Account adjustments shown in the 191 SUM.
- 4) Revenue Review
- a) Recalculate the 191 Account revenues (excluding miscellaneous revenues and credits) and tie the result to the 191 SUM.

## 4 RISK ASSESSMENT

As part of the risk assessment, the Division requested a list of QGC's internal audit reports (operational or financial/internal control) that had been performed on 191 components for CY 2012. The Division reviewed the list of QGC's internal audit reports and did not find any particular issues or areas of concern. Finding no additional areas of concerns from the 2012 internal audit report list, the Division determined that it was substantially similar to previous years and relied upon risk areas that were identified in the CY 2009 and 2010 audit. The two main areas of risk are storage gas related costs and adjustment to the 191 Account.

### 4.1 RISK - STORAGE GAS RELATED COSTS

During the audit, it was determined that the greatest likelihood of misstatement was with storage gas costs (withdrawal value/charges, injection value/charges, return on storage gas). This is due to the complexity of the storage inventory calculations, and the use of an estimate that is determined by the company for storage injection and withdrawal values. Net storage gas costs constitute 4.64% of total gas costs. The Division's audit for 2012 included a review of storage costs for January, March, July, and August.

### 4.2 RISK - COMPANY ADJUSTMENTS TO THE 191 ACCOUNT

Adjustments to the 191 Account were also considered to be of greater risk due to their nature of being outside the normal operating expenses and revenues that are booked to the 191 Account. In the calendar year of 2012, there were approximately \$(321,840) in net adjustments to the 191 account. The results of the adjustment review are discussed in section 5.3.7 below.

## 5 AUDIT PROCEDURES AND RESULTS

In addition to the items identified in the risk assessment, the Division tested many other key areas of the 191 account. The majority of the Division's audit procedures focused on the costs and revenues included in the 191 account for the calendar year of 2012. The audit procedures and tests discussed below are summaries of the work performed by the Division. In addition to the audit procedures and tests performed, the Division also sent data requests and held meetings with QGC to discuss certain aspects of the 191 account.

## 5.1 HIGH LEVEL RECONCILIATIONS – RECONCILE 191 ACCOUNT TO 2012 10K

The purpose of this procedure was to verify that the amounts included in the 191 account tie to the amounts reported in the 2012 10K. Differences were investigated when the amounts differed. Based on the Division's review, it appears the costs and revenues reported in the 191 account tie back to the costs and revenues reported in the Company's 10K report.

## 5.2 NET GAS COST REVIEW

### 5.2.1 COMMODITY PERCENTAGE RECONCILIATION

The Division verified that the commodity percentages used to allocate costs to Utah were calculated correctly. The DPU calculated commodity percentages from the decatherms reported in the Booked Revenue Report. The DPU recalculated Utah Commodity percentages and tied them to the amounts reported by QGC. No material exceptions were noted.

### 5.2.2 DEMAND PERCENTAGE RECONCILIATION

The percentages used to allocate demand costs to Utah originate from QGC's pass through filings. The applicable pass through filings for CY 2012 are Docket Nos. 11-057-08, and Docket Nos. 12-057-02. According to the pass through model in Docket No. 11-057-08, 96.931% should be applied as the monthly demand percentage in January through August. After reviewing QGC's reported demand percentages, the Division found that the correct demand percentages were applied in January through July. However, the incorrect demand percentage was applied in August. It appears that QGC applied the new September demand percentage of 96.700% a month early in August. As shown in the table below, \$15,893 was misallocated due to the incorrect demand percentage applied in August. With the exception in August, the demand percentages applied in the rest of the calendar year of 2012 agreed to the demand percentages filed in QGC's pass through model.

Audit Month	DPU Demand %	QGC Reported Demand %	Difference	Demand Costs	Potential Error
1/31/2012	96.931%	96.9300%	-0.0010%	7,821,919	77
2/29/2012	96.931%	96.9300%	-0.0010%	7,812,500	77
3/31/2012	96.931%	96.9300%	-0.0010%	7,672,242	76

4/30/2012	96.931%	96.9300%	-0.0010%	7,169,189	71
5/31/2012	96.931%	96.9300%	-0.0010%	6,760,656	67
6/30/2012	96.931%	96.9300%	-0.0010%	6,861,054	68
7/31/2012	96.931%	96.9300%	-0.0010%	6,891,079	68
8/31/2012	96.931%	96.7000%	-0.2310%	6,880,293	15,893
9/30/2012	96.700%	96.7000%	0.0000%	6,897,439	(1)
10/31/2012	96.700%	96.7000%	0.0000%	6,910,024	(1)
11/30/2012	96.700%	96.7000%	0.0000%	6,924,246	(1)
12/31/2012	96.700%	96.7000%	0.0000%	15,114,375	(1)
Total					16,392

### 5.2.3 RECALCULATION OF MONTHLY 191 ACCOUNT BALANCE

In this audit procedure, the Division allocated the total Company costs to Utah, added DPU calculated gas revenues, and applied the applicable interest costs, bad debt percentages, and other QGC 191 Adjustments to arrive at monthly 191 Account balances. These amounts were then compared to the amounts reported by QGC in the 191 SUM. The results of this procedure are shown below.

<b>Month</b>	<b>DPU CALCULATED 191 BALANCE</b>	<b>QGC REPORTED 191 BALANCE</b>	<b>Difference</b>
1/31/2012	(25,399,705)	(25,399,085)	(620)
2/29/2012	(40,993,513)	(40,990,871)	(2,642)
3/31/2012	(52,493,590)	(52,490,620)	(2,970)
4/30/2012	(50,233,330)	(50,230,132)	(3,198)
5/31/2012	(3,195,933)	(3,192,332)	(3,601)
6/30/2012	315,454	318,487	(3,033)
7/31/2012	6,119,436	6,122,582	(3,146)
8/31/2012	17,049,935	17,037,279	12,656
9/30/2012	27,232,756	27,220,286	12,470
10/31/2012	30,954,482	30,943,266	11,216
11/30/2012	24,587,076	24,577,348	9,728
12/31/2012	15,480,837	15,473,515	7,322

The difference between DPU calculated balance and QGC reported balance is \$7,322 for the calendar year 2012. The difference occurred primarily due to the incorrect demand percentage applied by QGC in August. The Division asked QGC for an explanation, as this error was observed in both 2011 and 2012. In response to the Division's inquiry, QGC explained that it implemented a verification procedure in June of 2012 to increase accuracy in the 191 Account.<sup>1</sup>

<sup>1</sup> In the Matter of Division of Public Utilities Audit of Questar Gas Company's 2012 191 Account, DPU Data Request 6.02.

With this explanation, the Division finds that QGC reported balance is reasonable and proposes no adjustments.

### 5.3 NET GAS COST REVIEW

The Division performed several review procedures to ensure that total Company expenses and Utah revenues reported in the 191 SUM are in fact supported by invoices, billing statements, checks, inventory calculations, and other documentation. The 191 account net gas costs can be broken down into the following components: Wexpro operating costs, purchased gas, storage gas, gathering costs, transportation costs, and overriding royalties. The proportion of each component related to the total net gas costs as a whole is shown below:

Total Company Net Gas Cost		
Gas Cost	CY 2012 Amount	% of Total
<b>Wexpro Costs</b>	<b>290,958,847</b>	<b>59.75%</b>
<b>Purchased Gas</b>	<b>104,174,730</b>	<b>21.39%</b>
<b>Storage Gas Costs</b>	<b>22,612,703</b>	<b>4.64%</b>
<b>Gathering Costs</b>	<b>20,526,658</b>	<b>4.21%</b>
<b>Transportation Costs</b>	<b>63,871,934</b>	<b>13.12%</b>
<b>Overriding Royalties</b>	<b>-15,060,432</b>	<b>-3.09%</b>
<b>Gas Management (WY Only)</b>	<b>44,600</b>	<b>0.01%</b>
<b>Non-Core Customer Revenue (WY Only)</b>	<b>-133,310</b>	<b>-0.03%</b>
<b>Total Net Gas Costs</b>	<b>486,995,730</b>	<b>100.00%</b>

Each of these components, with the exception of the Wyoming accounts, are discussed in the sections that follow.

#### 5.3.1 WEXPRO COSTS

QGC's total Wexpro costs are \$291 million. Wexpro related costs constitutes 59.75% of the total net gas costs. These costs are spread to approximately 9 different sub-accounts of the 191 Account. The Division aggregated Wexpro account entries shown on QGC's ABS and then tied those amounts to the 191 SUM. In addition to reconciling the total Wexpro costs with 191 SUM, the Division reviewed sample invoices and found that invoices support the amounts stated in ABS entries.

#### 5.3.2 PURCHASED GAS COSTS

QGC's total purchased gas costs are \$104 million. Purchased gas constitutes 21.39% of the total net gas costs. These costs are spread to approximately 6 different sub-accounts. The Division totaled the purchased gas amounts shown on QGC's ABS and then tied those amounts to the 191 SUM. The Division requested QGC purchase gas cost related invoices and found the supporting documents are consistent with the total purchased gas costs stated in ABS entries.

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### 5.3.3 STORAGE GAS COSTS

Storage related costs consist of injection and withdrawal charges, injection and withdrawal value, and return on storage gas. While the net storage gas costs constitutes only 4.64% of the total Company gas costs, it is important to note that two components of the storage gas costs are the value of gas injected into storage (\$72 million) and the value of gas withdrawn from storage (\$73.9 million). These two components largely offset each other but are significant in and of themselves. The Division reviewed the storage costs invoices for the accounting or “voucher” months of January, March, July, and August. No exceptions were noted.

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### 5.3.4 GATHERING COSTS

QGC’s total gathering costs are \$20.5 million. Gathering costs constitute approximately 4.21% of the total net gas costs. The gathering costs in the 191 SUM can be traced to accounting estimates in QGC's accounting journals and invoices from third parties.

The Division was able to tie gathering costs related invoices related to the amounts included in the 191 SUM. It appears the gathering costs are properly stated in 191 SUM.

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### 5.3.5 TRANSPORTATION COSTS

QGC’s total Transportation costs are \$63.9 million and constitute approximately 13.12% of the net gas costs. The Division tied the Demand, Commodity and ACA charges from the 191 SUM to the QPC invoices.

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### 5.3.6 OVERRIDING ROYALTIES

QGC receives 7% overriding royalty payments from Wexpro’s exploratory properties. For the calendar year of 2012, \$15.1 million is recorded as revenues from overriding royalties in account 495007. These revenues offset gas costs and represent 3.09% of total net gas costs.

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### 5.3.7 QGC ADJUSTMENTS TO 191 ACCOUNT

In addition to the net costs and revenues reported in the QGC 191 SUM, QGC made several adjustments to Utah’s 191 Account balance that had the net impact of reducing the balance by \$(321,840). The adjustments for each month are shown as follows:

Month	Amount
February 2012	(22)
April 2012	(166,663)
May 2012	(28)
June 2012	4,186
July 2012	143
August 2012	1,316

September 2012	(133)
October 2012	(122,705)
November 2012	(481)
December 2012	(37,453)
<b>Total 2012 Adjustment</b>	<b>(321,840)</b>

The Division reviewed the list of adjustments made in each month and found that large adjustments made in 2012 were cash payments from Questar Pipeline. According to the explanation by QGC, these cash payments arise when Questar Pipeline is required by its tariff to distribute revenue to its customers from penalties paid by other customers, such as overrun penalties. Another large adjustment entry made in 2012 was a \$41.6 million dollar adjustment. This adjustment was a customer refund that was given because the 191 Account balance reached a level that was too high and was decided that a one-time refund was more appropriate than amortizing the balance.

## 5.4 REVENUE REVIEW – ACCURACY

### 5.4.1 RECALCULATE 191 REVENUES

The Division recalculated tariff revenues by taking the decatherms reported in the Booked Revenue Report spreadsheet provided by QGC and multiplying the applicable rate classes by the corresponding tariff rates effective at that time. The Division calculated a difference of \$546,221 between the 191 Utah reported revenue total and the Division's revenue calculation. This difference constitutes 0.1126% of the total \$485,297,448 Utah reported revenue. The Division asked QGC about the difference was provided with an explanation. The variance in the reported revenue is due to the billing cycle timing and the change of tariff rate timing. Because the customer billing cycles do not always correspond to the beginning and ending of each month, when there is a rate change, those customers are billed using a weighted average of the two rates. The Division finds that the revenue difference is reasonable and is not material.

## 6 CONCLUSION

Based on the findings of our audit, the differences found between the reported 191 Account balance and the Division's calculated 191 Account balance were immaterial. No adjustments are proposed for the calendar year of 2012.