COST ALLOCATION MANUAL FOR ENSTAR NATURAL GAS COMPANY

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Regulatory Commission of Alaska
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Introduction

ENSTAR Natural Gas Company (ENSTAR) uses a work order accounting system, which is capable of identifying, segregating and accumulating costs to specific work orders. ENSTAR allocates indirect expenses (administrative & general and construction overhead) to construction activities on a monthly basis.

The allocation methodology for reimbursable construction projects (including CINGSA) is audited by the State of Alaska Department of Transportation and Public Facilities (AK-DOT) each year, and rates are set for each year based on prior year actual financial results. The State of Alaska uses the criteria in 23 CFR 1-645, Highways and 48 CFR 31, Federal Acquisition Regulations (FAR) to determine the acceptability of ENSTAR's accounting system and allowable costs.

The allocation methodology for internal construction projects is based on actual financial results for the current year. The methodology uses the same formulae as the allocation methodology for reimbursable construction and CINGSA, only without the one-year lag in rates that is inherent in the State's auditing and rate-setting program.

The following sections describe the allocation methodology for specific types of costs. In each case the costs are allocated to internal projected based on current year rates, and to reimbursable construction and CINGSA based on prior year rates.

CINGSA, LLC

Cook Inlet Natural Gas Storage Alaska (CINGSA), LLC, owns a gas storage facility that is managed by ENSTAR employees, per an agreement between the two entities. ENSTAR's parent company owns a 65% interest in the facility. CINGSA has its own set of books and records.

ENSTAR-bills GINGSA-each-month-for-direct-labor, materials and administrative & general (A&G) overhead. ENSTAR is precluded by the management agreement from charging a management fee to CINGSA.

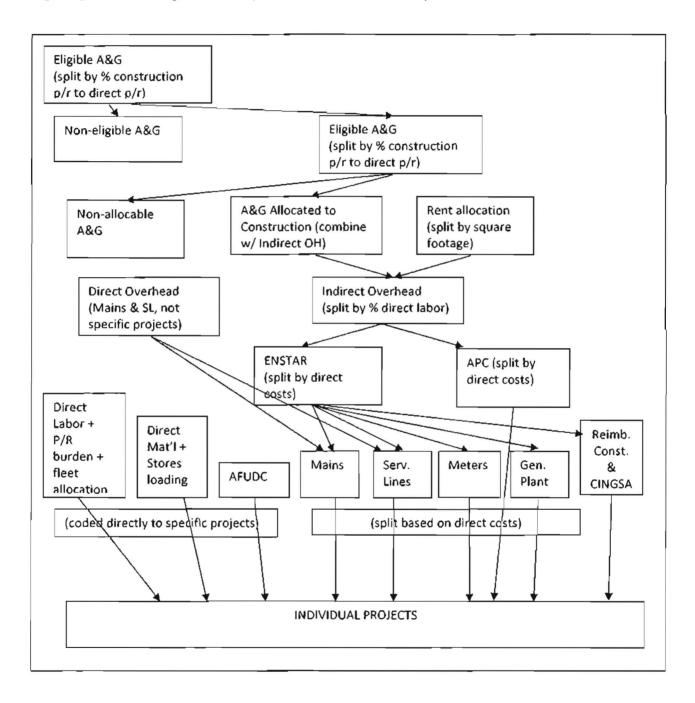
ENSTAR employees charge their time to CINGSA for work done on its behalf. Payroll burden is added to direct labor. The direct labor charges are then allocated A&G overhead using rates determined by AK-DOT in the annual audit. The methodology for determining these rates is described in the remaining sections of this document.

If materials are issued from ENSTAR's warehouse, stores loading will be added to the direct material cost.

Transportation loading is not allocated to CINGSA, as the costs for CINGSA vehicles are charged directly to CINGSA. However, if an ENSTAR employee with an ENSTAR vehicle were to perform work for CINGSA, fleet loading would be added to that employee's direct labor charges.

The most recent audit report from AK-DOT is attached as Appendix A. While the AK-DOT audit combines construction overhead and general overhead into one rate, ENSTAR separates this into two rates (see Appendix B). CINGSA is charged only for general overhead, not for construction overhead, as construction overhead relates solely to ENSTAR/APC construction projects.

The following flowchart summarizes the flow of project costs through ENSTAR's accounting systems. Details regarding the methodology for each step of the flowchart are in subsequent sections.



Allocation of Administrative & General Expenses

Eligible administrative & general ("A&G") expenses are based on Regulatory Commission of Alaska (RCA), Federal Energy Regulatory Commission (FERC), FAR, and AK-DOT guidelines, rules and regulations. The basis for selecting the eligible accounts is their relationship to the normal operating functions of the utility. Some accounts are analyzed and split into eligible and non-eligible expenses based on the nature of the specific charges-to-the-account. Accounts that are currently analyzed and split, and the determination of which expenses are eligible, include:

| Object Account / Description | Determination of eligibility |
|------------------------------|--|
| Office supplies | Supplies related to regular business activity are eligible. |
| Office – contract labor | Charges for office temporary labor are eligible. |
| Legal | Charges related to general business, such as human resources or rate case issues. Charges related to litigation are not eligible. |
| Insurance | Charges for general liability. Charges for Directors & Officers policy and other policies are not eligible. |
| Advertising | Charges for educational and safety materials, such as statement inserts and 811 promotion. Charges for company promotion are not eligible. |

The following is a partial list of A&G accounts and their eligibility:

Description Eligibility Salaries Eligible - Labor Payroll Vac-Sick-Holida Eligible - Labor Benefits Eligible - Benefits Employee Relations Not eligible Employee Awards Eligible - Benefits Eligible - Benefits Relocation Expenses Community Relations Not eligible Employee Other Benefits Not eligible

Office Supplies Split

Telephone Eligible - Expense Postage & Shipping Eligible - Expense

Eligible - Data Processing Computer Expenses

Office - Contract Labor Split

Building Maintenance Eligible - Expense Ground Travel Eligible - Expense Air Travel Eligible - Expense Lodging Eligible - Expense Eligible - Expense Meals & Ent-Out of Town

Meals & Ent-Other Not eligible Meetings Not eligible Training Not eligible Conferences Not eligible Social Club Dues Not eligible **Dues & Subscriptions**

Eligible - Expense Eligible - Expense Membership Dues - Other Parent Allocations Not eligible

Legal Split

Accounting Eligible - Audit Other Professional Svs Eligible - Expense

Split General Liability Insur Split Property Insurance Auto Liab - TPA Fees Not eligible Bonds Not eligible Regulatory Expenses Eligible - Expense

Advertising Split

Job Advertising-Recruitment Eligible - Expense Corporate & Securities Not eligible Eligible - Expense Safety Expenses Injuries & Damages Not eligible Discounts Taken/Lost Not eligible

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Once the eligible A&G is determined, the A&G allocable to construction (including reimbursable construction and CINGSA) is calculated. The ratio of total construction payroll, including CINGSA, to total direct payroll determines the percentage of eligible A&G that can be allocated to construction.

To determine total direct payroll, indirect salaries (administrative and general) are subtracted from total gross payroll. Salaries for Directors in Operations and Engineering that were charged to indirect payroll are added back. Finally, payroll accruals are removed.

Total construction payroll is calculated by adding the payroll charged directly to CWIP (Construction Work-in-Process) projects, RWIP (Retirement Work-in-Process) projects and CINGSA; as well as payroll charged to Stores Expense Undistributed (Warehouse) and Transportation (Vehicle Shop) allocated to CWIP. For example:

| Direct Payroll | |
|---|-------------------|
| Gross Payroll | 14,461,992 |
| Indirect payroll | (1,314,505) |
| Add back: Operations Management Directors | 31,642 |
| Accruals | (1,924,231) |
| | |
| Total Direct Payroll | <u>11,254,898</u> |
| | |
| Construction Payroll (CWIP & RWIP) | |
| ENSTAR-Direct payroll charges | 2,458,213 |
| ENSTAR-Direct payroll overhead charges | 517,645 |
| APC-Direct payroll charges | 281,926 |
| CINGSA - Direct payroll charges | 697,209 |
| CMID Decirel shares included to | |
| CWIP Payroll charges included in: | 00.047 |
| Stores Loading | 83,947 |
| Transportation Loading | 107,306 |
| Total Construction Powell | 4 146 247 |
| Total Construction Payroll | 4,146,247 |
| Percentage to apply to eligible A&G | <u>36.84%</u> |

The calculation of A&G to allocate to all types of construction starts with the *eligible* A&G expenses (as described above), and subtracts Directors' payroll and benefits. The remaining A&G is multiplied by the percentage calculated above.

The A&G allocated to internal construction projects is split between ENSTAR and APC based on the direct labor charges to each company, and added to Indirect Construction Overhead. It is then allocated to specific activities via the Indirect Overhead Allocation methodology (see Allocation of Indirect Overhead in next section.)

Allocation of Indirect Construction Overhead

ENSTAR allocates indirect construction overhead to internal construction projects and reimbursable construction projects. Because these costs do not provide benefit to CINGSA, they are not allocated to CINGSA.

Indirect construction overhead consists of costs related to ENSTAR construction projects, but not to one particular project. These costs are accumulated in the following project accounts:

| Project Number* | Description |
|-----------------|-------------------------------|
| 415199000500 | Engineering OH – Anchorage |
| 415199000xxx | Distribution OH – Anchorage |
| 415399000500 | Engineering OH – Kenai |
| 415399000xxx | Distribution OH – Kenai |
| 415499000500 | Engineering OH – Mat. Valley |
| 415499000xxx | Distribution OH – Mat. Valley |

*Project Number Key:

- First digit indicates Company (4=ENSTAR, 5=APC)
- Second and third digits indicate year
- Fourth digit indicates geographic area (1=Anchorage, 2=ER, 3=Kenaí, 4=Mat Valley)
- Fifth and sixth digits indicate FERC type of job (76=Mains, 80=Serv. Lines, 99=Overhead)
- Seventh through tenth digits indicate specific project
- Last two digits indicate type and size of pipe, if applicable.

Charges to these projects (and all CWIP projects) are recorded in the general ledger in the following object accounts:

| Object Account | Description |
|----------------|-------------------------------------|
| 26100 - 26170 | Labor |
| 26410 | Subcontract |
| 26300 | Materials / Supplies |
| 26301 | Other Costs (Rent & A&G Allocation) |
| 26600 | Permits |
| 26210 | Fleet |
| 26220 | Other clearing (Payroll Burden) |
| 26610 | AFUDC |

Examples of indirect overhead costs include maintenance costs, supplies, and salaries.

The allocation methodology for indirect overhead uses a ratio of direct costs by activity to total direct costs. This ratio is applied to the total of indirect overhead plus allocated A&G expenses (see A&G allocation section), and the result is allocated to the appropriate construction activities.

For example, the calculation of the amount of indirect overhead and A&G to allocate to internal construction projects is:

| Project # | Description | |
|---------------------|-----------------------------------|-----------|
| 406199000500 | Engineering OH-AN | 365,084 |
| 406199000xxx | Distribution OH-AN | 744,859 |
| 406399000500 | Engineering OH-SK | - |
| 406399000xxx | Distribution OH-SK | 202,621 |
| 406499000500 | Engineering OH-MV | 24,543 |
| 406499000xxx | Distribution OH-MV | 165,950 |
| | 0.47.1.1 | 4.500.053 |
| | Subtotal | 1,503,057 |
| 406999000100 | A&G Allocations to Const - Enstar | 2,420,570 |
| 506999000300 | A&G Allocations to Const - APC | 163,090 |
| | | |
| | Subtotal | 2,583,661 |
| | | |
| Total Indirect Cons | struction and A&G to allocate | 4,086,717 |
| | | |

This amount is split between ENSTAR and APC based on direct labor dollars, as shown below:

| | 0.00 |
|--------------------------------------|---|
| Direct Labor | |
| Mains | 312,269 |
| Services lines | 523,595 |
| Meter Loop Assem | 199,833 |
| Asbuilts | 77,368 |
| Purchases & Facilities | |
| Subtotal - Enstar | 1,113,065 |
| APC | 211,179 |
| Total Direct Labor | 1,324,244 |
| Percentage of Total Enstar APC Total | 84.05% <u>15.95%</u> <u>100.00%</u> |
| | |

The indirect Construction and A&G to be allocated is split between the two companies:

| Enstar Overhead to Allocate APC Overhead to Allocate | 3,315,554.81 629,186.19 | (\$3,944,741 x 84.05%) (\$3,944,741 x 15.95%) |
|--|----------------------------|--|
| Total | 3,944,741.00 | |

These amounts are allocated based on the ratio of direct costs by activity to total direct costs:

| CWIP Activity | Direct Costs | Percent | Indirect OH |
|---------------------------|--------------|----------------|------------------|
| Mains-AN/ER/TA | 530,543 | 9.01% | 298,893 |
| Mains-SK | 316,564 | 5.38% | 178,343 |
| Mains-MV | 1,218,646 | 20.71% | 686,5 5 0 |
| Services-AN/ER/TA | 711,091 | 12.08% | 400,608 |
| Services-SK | 196,025 | 3.33% | 110,435 |
| Services-MV | 842,381 | 14.31% | 474,573 |
| Meter Loop Assem-AN/ER/TA | 941,547 | 16.00% | 530,441 |
| Meter Loop Assem-SK | 46,448 | 0.79% | 26,167 |
| Meter Loop Assem-MV | 203,063 | 3.45% | 114,400 |
| Asbuilts - AN/ER/TA | 69,511 | 1.18% | 39,161 |
| Asbuilts - SK | 20,526 | 0.35% | 11,564 |
| Asbuilts - MV | 37,980 | 0.65% | 21,397 |
| Purchases & Facilities | 750,877 | <u>12.76%</u> | 423,023 |
| Subtotal - Enstar | 5,885,203 | <u>100.00%</u> | 3,315,555 |
| APC | 7,123,250 | <u>100.00%</u> | 629,186 |
| Total | 13,008,453 | | 3,944,741 |
| | | | |

This overhead allocation is added to the Direct overhead allocation (see Allocation of Direct Overhead in next section) for Total overhead, which is used to calculate the effective overhead rate:

| CWIP Activity | Direct Costs | Indirect OH | Direct OH | Total OH | OH Rate |
|---------------------------|--------------|-------------|-----------|-----------|----------------|
| Mains-AN/ER/TA | 530,543 | 298,893 | 161,993 | 460,886 | 86.87% |
| Mains-SK | 316,564 | 178,343 | 81,698 | 260,041 | 82.14% |
| Mains-MV | 1,218,646 | 686,550 | 265,667 | 952,217 | 78.14% |
| Services-AN/ER/TA | _711,091 | 400,608 | 93,187 | 493,795 | 69,44% |
| Services-SK | 196,025 | 110,435 | 20,465 | 130,900 | 66.78% |
| Services-MV | 842,381 | 474,573 | 122,273 | 596,846 | 70.85% |
| Meter Loop Assem-AN/ER/TA | 941,547 | 530,441 | - | 530,441 | 56.34% |
| Meter Loop Assem-SK | 46,448 | 26,167 | - | 26,167 | 56.34% |
| Meter Loop Assem-MV | 203,063 | 114,400 | - | 114,400 | 56.34% |
| Asbuilts - AN/ER/TA | 69,511 | 39,161 | - | 39,161 | 56.34% |
| Asbuilts - SK | 20,526 | 11,564 | - | 11,564 | 56.34% |
| Asbuilts - MV | 37,980 | 21,397 | - | 21,397 | 56.34% |
| Purchases & Facilities | 750,877 | 423,023 | | 423,023 | 56.34% |
| Subtotal - Enstar | 5,885,203 | 3,315,555 | 745,283 | 4,060,838 | 69.00% |
| APC | 7,123,250 | 629,186 | 59,285 | 688,471 | 9.67% |
| Total | 13,008,453 | 3,944,741 | 804,568 | 4,749,309 | 36.51% |
| | | | | | |

The calculated rate at the end of each year is used to allocate overhead to reimbursable construction in the subsequent year. CINGSA does not get allocated indirect construction costs or direct overhead, only the A&G portion of indirect overhead.

Allocation of Direct Construction Overhead

Direct construction overhead is not charged to reimbursable construction projects or to CINGSA. Direct construction overhead is for costs related to Mains and Service lines, but not related to a specific main or service line. These costs are accumulated in the following project accounts:

| Project Number* | Description |
|-----------------|--|
| 415176990100 | Direct Dist. – Mains – Anchorage |
| 415176990200 | Direct Eng. – Mains – Anchorage |
| 415176990300 | Direct Mktg. – Mains - Anchorage |
| 415376990100 | Direct Dist. – Mains – Kenai |
| 415376990200 | Direct Eng. – Mains – Kenai |
| 415376990300 | Direct Mktg. – Mains - Kenai |
| 415476990100 | Direct Dist. – Mains – Mat. Valley |
| 415476990200 | Direct Eng. – Mains – Mat. Valley |
| 415476990300 | Direct Mktg. – Mains – Mat. Valley |
| 415180990100 | Direct Dist. – Serv. Lines – Anchorage |
| 415180990200 | Direct Eng. – Serv. Lines – Anchorage |
| 415180990300 | Direct Mktg. – Serv. Lines - Anchorage |
| 415380990100 | Direct Dist. – Serv. Lines – Kenai |
| 415380990200 | Direct Eng. – Serv. Lines – Kenai |
| 415380990300 | Direct Mktg. – Serv. Lines - Kenai |
| 415480990100 | Direct Dist. – Serv. Lines – Mat. Valley |
| 415480990200 | Direct Eng. – Serv. Lines – Mat. Valley |
| 415480990300 | Direct Mktg. – Serv. Lines – Mat. Valley |
| 515999000100 | Engineering OH – APC |
| 515999000200 | Trans. Distribution OH - APC |

*Project Number Key:

- First digit indicates Company (4=ENSTAR, S=APC)
- Second and third digits indicate year
- Fourth digit indicates geographic area (1=Anchorage, 2=ER, 3=Kenai, 4=Mat Valley)
- Fifth and sixth digits indicate FERC type of job (76=Mains, 80=Serv. Lines, 99=Overhead)
- Seventh through tenth digits indicate specific project
- Last two digits indicate type and size of pipe, if applicable.

Charges to these projects (and all CWIP projects) are recorded in the general ledger in the following object accounts:

| Object Account | Description | |
|----------------|----------------------|--|
| 26100 - 26170 | Labor | |
| 26410 | Subcontract | |
| 26300 | Materials / Supplies | |
| 26301 | Other Costs | |
| 26600 | Permits | |
| 26210 | Fleet | |
| 26220 | Other clearing | |
| 26610 | AFUDC | |

Direct overhead costs are made up of supervisor time directly related to mains/service lines activities, materials used on multiple projects, and other direct costs that are not specific to one project.

Direct overhead is allocated to the related CWIP jobs based on direct costs. For example, 415176990100 (Direct Dist. – Mains – Anchorage) would be allocated to CWIP projects for Mains in the Anchorage area.

An example of the allocation for direct overhead related to Anchorage service lines:

| 415180990100.26xxx | 100.00 | |
|---------------------------------|------------|-----------------------------|
| 415180990200.26xxx | 2,500.00 | |
| 415180990300.26xxx | 450.00 | |
| Total - Direct OH- SL Anchorage | 3,050.00 | (to be allocated) |
| | | |
| SL Anchorage open CWIP direct c | osts: | |
| 4151800001xx.26xxx | 15,500.00 | 60.67% |
| 4151800002xx.26xxx | 3,200.00 | 12.52% |
| 4151800003xx.26xxx | 6,850.00 | <u>26.81%</u> |
| Total Direct Costs-SL Anchorage | 25,550.00 | <u>100.00%</u> |
| Allocation of OH to CWIP | | |
| 4151800001xx.26570 | 1,850.29 | $(60.67\% \times 3,050.00)$ |
| 4151800002xx.26570 | 382.00 | $(12.52\% \times 3,050.00)$ |
| 4151800003xx.26570 | 817.71 | (26.81% x 3,050.00) |
| 415999000200.26570 | (3,050.00) | |
| | | |

Stores Expense Allocation

The Stores Expense Undistributed account consists of the following: payroll and benefits, accounts payable vouchers, fleet allocations, insurance, building services and data processing charges. All charges relating to the warehousing function are accumulated in this account. The stores expense is allocated based on a percentage of the value of items leaving ENSTAR's inventory.

The inventory object accounts are:

| Object Account | Description |
|----------------|------------------------------------|
| 4.15100 | Pipe, Fittings & General Inventory |
| 4.15130 | Pipe, Fittings – Shop Trucks |
| 4.15220 | Gas Meas. & Reg. Material |
| 4.15230 | Gas Meters |
| 4.15280 | Non Stock Inventory |

The stores loading rate is developed using a ratio of stores expense loaded out divided by the total dollar value of inventory issues to compute a rate which can be applied to material charged to each project.

For CINGSA and reimbursable construction projects, the stores loading rate is based on prior year actual stores costs and inventory issued.

Fleet Allocation

Several accounts are used to accumulate costs associated with the transportation shop: labor, materials, depreciation, supplies, etc. At month end, vehicle work costs are transferred as direct vehicle charges (i.e. repairs) using a standard shop rate. Costs are charged to each vehicle that had work performed on it based on labor hours. The shop rate is adjusted periodically to make sure it allocates all accumulated costs.

Separate accounts accumulate costs directly associated with a vehicle. In order to allocate the costs from these accounts, the charges are first sorted by business unit, based on where the vehicles are assigned. CINGSA has a unique set of business units, and vehicles used by CINGSA exclusively are assigned to those business units.

For example: The balance in the direct vehicle charge accounts is \$2,100.

| Business Unit | Direct Charges |
|----------------|----------------|
| 4400 | \$500 |
| 4271 | 600 |
| 72200 (CINGSA) | 1,000 |
| Total | \$2,100 |

Now the gross wages for these business units are subtotaled (excluding payroll accruals):

| Business Unit | Gross Wages |
|----------------|-------------|
| 4400 | \$4,000 |
| 4271 | 7,500 |
| 72200 (CINGSA) | 3,000 |
| Total | \$11,800 |

The ratio of the direct charges to the gross wages is the percentage of labor dollars that will be used to distribute fleet costs by object code within the business unit. For business unit 4400: \$500/\$4,000 = 12.5%, for business unit 4271: \$600/\$7,500 = 8%, and for 4271 - \$1,000/\$3000 = 33.3%.

Now the gross wages are analyzed by account within the business unit. The fleet costs are allocated to each of these according to the percentage calculated above times the wages that were charged to the particular job or other account. For business unit 4400 in the example above, the charges are to the following object codes:

| Account | Fleet allocation |
|--------------|-----------------------|
| CWIP | \$2,000*12.5% = \$250 |
| Reimbursable | |
| Construction | \$2,000*12.5% = \$250 |

Charges to the CINGSA business unit are likewise separated based on labor charges within CINGSA. If labor is charged to CINGSA capital projects, the related fleet allocation will go to CINGSA capital. If labor is charged to CINGSA O&M, the fleet allocation will go to CINGSA O&M.

The CWIP and Reimbursable Construction allocations are broken down one step further and allocated to specific job numbers.

BU 4400 employees' wages charged to CWIP are now broken down into specific CWIP job numbers and multiplied by the allocation percentage:

| CWIP Job # | Wages | | Allocation |
|------------|------------|-----------|------------|
| CWIP #1 | \$500.00 | @ 12.5% = | \$62.50 |
| CWIP #2 | \$500.00 | @ 12.5% = | \$62.50 |
| CWIP#3 | \$750.00 | @ 12.5% = | \$93.75 |
| CWIP #4 | \$250.00 | @ 12.5% = | \$31.25 |
| | \$2,000.00 | | \$250.00 |

CINGSA fleet allocations would be similarly broken down by project, assuming labor is charged to capital projects.

Payroll Burden Allocation

Payroll burden costs are accumulated in a balance sheet account (4.18960) and allocated each month. These costs include employer's payroll taxes, workers' compensation costs, accrued vacation and accrued holidays. Payroll burden does not include pension, 401(k) matching, or healthcare costs, as these are included in A&G and allocated through a separate process (as described above).

The allocation begins with payroll, which is sorted based on the accounts to which labor has been charged within each Business Unit. Labor charged to CINGSA is tracked in a unique set of business units (72xxx). Payroll burden related to CINGSA labor charges is added to the direct labor charged to CINGSA. Reimbursable construction labor is charged to a specific object account (18932), and payroll burden is added accordingly.

Example: The applicable Gross Wages for the month are \$50,725. The balance to be allocated is \$15,000. Payroll burden is calculated as \$15,000/50,725 = average of 29.57% to be loaded to the applicable business units.

| Object | Description | Gross Wages (Adjusted) | Burden to Allocate | Burden % |
|--------------------|---------------------------|---------------------------|-----------------------|----------|
| 415xxxxxxxxx.26110 | CWIP | \$10,000 | \$2,957 | 29.57% |
| 4xxxx.18932 | Reimbursable Construction | 10,000 | 2,957 | 29.57% |
| 72200.xxxxx | CINGSA | 2,000 | 591 | 29.57% |
| xxxx.76100 | A&G | 3,000 | 887 | 29.57% |
| xxxx.75200.9021 | Meter Reading O&M | 10,725 | 3,172 | 29.57% |
| xxxx.74320 | Service Calls O&M | 7,000 | 2,070 | 29.57% |
| xxxx.74872 | Mains Expense O&M | 8,000 | <u>2,366</u> | 29.57% |
| | TOTAL | \$50,725 | \$15,000 | |

Rent Allocation

ENSTAR distributes 45% of Building Maintenance to various balance sheet accounts and O&M accounts. This percentage was derived based on square footage for each of ENSTAR's building facilities. CINGSA has separate facilities and does not receive a separate rent allocation.

Direct charges (electricity, snow removal, lawn care, etc.) are accumulated in object account 76490. Sub-accounts are used to track costs by location:

| 76490.1 | Admin Building | |
|----------|---------------------|--|
| 76490.3 | Soldotna Office | |
| 76490.4 | Wasilla Office | |
| 76490.11 | Operations Building | |
| 76490.14 | Palmer | |
| 76490.50 | Allocation | |

Year-to-date charges are totaled for all 76490 sub-accounts except 76590.50. The amount to be allocated is calculated as 45% of this total. The allocation is distributed by business unit and object account. The percentage charged to each facility is fixed based upon the facilities' footage.

The accounts that are charged are as follows:

| Account number | Description |
|--------------------|------------------------------|
| 415199000200.26301 | CWIP Overhead – Anchorage |
| 415399000200.26301 | CWIP Overhead – Kenai |
| 415499000200.26301 | CWIP Overhead - Mat. Valley |
| 4001.74790 | Distribution Operations |
| 5001.73140 | Transport Operations |
| 4.15900 | Stores Expense Undistributed |
| 4.18718 | Fleet |

The allocation is reversed each month and a recalculation of the YTD Rent Allocation is performed.

Allowance for Funds Used During Construction (AFUDC) Allocation to Construction Work In Progress

"An AFUDC rate is calculated based on guidance provided by FERC. The formula takes into account the company's debt rates and allowed return on equity (as determined by the most recently adjudicated rate case). Rates are computed at the beginning of each year based on prior year actual financial data.

A CWIP job that is eligible for AFUDC receives half of the monthly AFUDC percentage for all current month activity, including CWIP overhead allocation for that job, and a full percentage for all prior months' activity. Each job has an AFUDC code attached to it indicating whether it will receive AFUDC allocation. When the job is completed, it no longer receives AFUDC, so the code is changed in the job master file.

CINGSA capital projects are similarly coded to indicate whether they should receive an AFUDC charge. The interest rate for CINGSA AFUDC is based on CINGSA's debt rates and allowed equity rate.

After all direct cost activity for the month is posted to the job system and the allocation of overhead is posted to the job system, the AFUDC allocation is run. The allocation first totals all activity for the current month (direct costs plus overhead), then determines the AFUDC amount based on the half-month percentage. Next, the system totals all prior activity and determines the AFUDC allocation based on the full-month percentage. The half-month and full-month amounts are combined and posted to the job.

Reimbursable Construction

Costs are accumulated in specific project accounts. Timesheets, materials, accounts payable, and manual journal vouchers are coded to the applicable business unit (job number) and object code. ENSTAR then manually prepares job charge summaries of payroll, materials, subcontract costs and overheads. These job charges are then summarized on an ENSTAR billing to the State of Alaska or other customer.

For example:

| Business Unit* | Description | |
|----------------|--------------------------------|--|
| 41550 | Old Glenn Hwy relocation | |
| 41551 | Girdwood Drainage relocation | |
| 41552 | Huffman and Pintail relocation | |
| 41553 | France Road relocation | |

*Key: 1st digit equals Company number (4=ENSTAR, S=APC)

2nd and 3rd digits equal year

4th and 5th digits equal sequential job number.

Charges to these business units are accumulated in the following object codes:

| Object Code | Description | |
|-------------|--------------|--|
| 18932-18934 | Labor | |
| 18935 | Sub-contract | |
| 18936 | Materials | |
| 18937 | Permits | |
| 18938 | Overhead | |
| 18939 | Clearing | |

Overheads are applied to the billing based on rates audited and approved by the State of Alaska Department of Transportation each year, based on prior year actual numbers. The methodology for determining these rates is the same as the methodology described above.

Construction overhead, A&G overhead, payroll burden and fleet loading are applied to reimbursable projects based on direct labor charged to the project. Stores loading is applied based on inventory issued to the project.

A copy of the most recent audit report from AK-DOT is attached as Appendix A.

Appendix A

[Insert copy of AK-DOT audit here] $G:\Plant\Allocations\A\&G\A\&G\2014\From\ State\ Auditors\Flnal\ State\ Audit\ Report\ -\ 2015\ RC\ Rates.pdf$

Appendix B



ENSTAR Natural Gas Company

2015 Reimbursable Construction Projects Rates (based on 2014 data) - 6/4/2015

The proposed rates for the Construction and General Overhead and other loadings on Reimbursable Construction Projects for the 2015 Construction season have been calculated:

| | Year 2015 | |
|------------------------|-----------|-----------------------|
| Construction Overhead | 49.58% | of direct gross wages |
| General Overhead | 96.97% | of direct gross wages |
| Transportation Loading | 15.98% | of direct gross wages |
| Material Handling | 39.73% | of inventory issues |