

**UNS GAS, INC.'S RESPONSES TO
RUCO'S 04 SET OF DATA REQUESTS
RE: UNSG ARAM
DOCKET NO. G-04204A-24-0237
OCTOBER 19, 2026**

RUCO 4.01

Tie-Out, Reproduce, Verify

Pursuant to the ARAM protocols, Original Sheet 711-7, Section III.c.iv., which requires disclosure of “any other information that may reasonably have substantive effect on the calculation of the rates pursuant to the Formula Rate Template . . .”, please provide schedules sufficient to demonstrate and allow RUCO to tie-out, reproduce, and verify (1) the bill impacts stated in the Company’s ARAM Application; and (2) that the rates the Company proposes to be charged in connection with the ARAM Application are accurate (Schedule G and Schedule H).

RESPONSE:

Please see the UNS Gas ARAM TY2026 Excel workpaper. Please see the “Rate Summary”, “Residential Bill Impact” tab and the “A1-ARAM Lead” tabs to see the derivation and application of the ARAM rates.

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RUCO 4.02

Plant Investment

This is a follow up RUCO DR 1.02, regarding the first quarterly report and response to DR 1.02. For all projects in the ARAM test year and ARAM post-test year period known as of the date of this request, please fully update your response to RUCO 1.02. This may include but is not limited to the following information:

1. Project name and description;
2. Total project cost;
3. Applicable in-service dates;
4. An explanation of why the project is now being recovered.

This request is meant to get all of the information previously provided regarding the first quarterly report for all following quarters relating to which the Company has responsive information.

RESPONSE:

For ARAM test year, please see response to RUCO 2.39 which updated RUCO 1.02.

For ARAM post-test year, please see attached RUCO 4.02 PTY Plant Investement.xlsx.

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RUCO 4.03

Post Test Year

For the six-month post-test year under consideration in the ARAM, the Company projects \$10,538,986 in accumulated additions. For Project No. 250973A, UNSG Fixed Network Replacement, the Company projects approximately \$1,871,475 in additions during the six-month post-test year. Please provide:

1. A detailed description of the project activity;
2. The type of equipment being installed;
3. The locations/district where the new equipment will be installed;
4. Identify if the project involves replacement of existing equipment, new installations, or both.

RESPONSE:

1. 250973A UNSG Fixed Network Replacement- Project Activity

The UNS Gas Fixed Network Project will replace the aging and obsolete Itron fixed network infrastructure and ERT devices currently installed on all UNS gas meters. As part of this modernization effort, a new head-end system is being integrated with the UNS billing, meter data management, and customer information systems. This platform will manage the transmission and collection of meter data, provide real-time monitoring capabilities, and deliver a centralized dashboard for managing meter alarms, alerts, and network base station operations.

To support the new advanced metering infrastructure (AMI), communication sites are being identified, engineered, and constructed to establish reliable fixed-network coverage throughout the service territory. In parallel, preparations are underway for comprehensive testing of the head-end system integrations. Three pilot deployments are planned to validate end-to-end functionality, system performance, and operational readiness before full-scale deployment begins.

2. Type of Equipment

Sensus AMI solutions are being installed and include the following:

- **Sensus Sonix IQ-** a smart residential ultrasonic gas meter that features integrated pressure monitoring, meter health diagnostics, theft/tamper detection, and a remote or automatic shut-off ball valve located at the inlet side, and connects to walk-by, drive-by, or a fixed-base network.
- **Sensus SmartPoint GM-** a two-way communication transceiver that connects natural gas utility meters to walk-by, drive-by, or a fixed-base network.

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- **Sensus FlexNet Base Station-** a high-power, point-to-multipoint communication hub built to collect and manage data from smart utility meters and sensors.

3. Location/ Districts

The Sensus AMI solution will be installed in all UNS Gas districts, Prescott, Flagstaff, Kingman, Verde Valley, Show Low, Nogales, Cottonwood, Santa Cruz, and Lake Havasu and at every gas meter.

4.

This project includes both the replacement of existing equipment and the installation of new metering technology. The existing Itron Fixed Network will be replaced with the Sensus FlexNet® AMI Network, and existing Itron ERT devices will be replaced with Sensus SmartPoint® modules installed on diaphragm, rotary, and turbine gas meters currently in service. In addition, the Sensus Sonix IQ® meter will be deployed for all new residential meter installations and will gradually replace aging diaphragm meters throughout the existing system as part of the meter replacement program.

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RUCO 4.04

Account G394 - Tool, Shop, and Garage Equipment

Please provide the total amount included in the ARAM for Account G394 related to tool, shop, and garage equipment, by district.

1. What rationale or basis did the Company use to replace tools, shop and garage equipment? Identify what, specifically, was replaced, and whether it was at the end of its useful life.
2. It appears the Company replaced all tools, shop and garage equipment for all districts. Please confirm or deny, and if denying, explain the basis for doing so.
3. For each tool, shop or garage equipment item retired because the Company asserts it was at the end of its useful life, please identify when it was purchased and the date of retirement.
4. Please confirm the tools, shop and garage equipment for Project 250940A are not assigned to any district. If confirmed, in which part(s) of the system will these items be in use?

RESPONSE:

1. UNS Gas rational to replace equipment is based on need and budget to ensure safe and efficient operation of gas utility facilities. There are many different pieces of equipment that we procure as capital purchases in each of the gas districts each year. For example, a few of the types of equipment UNS Gas purchases for capital installation and maintenance equipment include pipeline tapping equipment, pipeline joining equipment, facility locators, gas leak detectors, corrosion protection surveys, emergency control equipment, equipment used in warehouses and fabrication shops, and many other such needs typical of a natural gas utility.

Need based reasoning is split between replacement and new purchases. Replacement needs typically result from offsetting high repair costs or downtime, reduced performance or wear, improved safety or risk of injury, broken or damaged equipment, end of physical or operational useful life, or regulatory and compliance changes. New equipment needs can result from new or improved technology, improved efficiency and speed, improved safety or ergonomics, energy or resource savings, or upfitting new or expanded workload demand.

2. As explained in #1, G394 is used to both purchase new and replace existing equipment. The Company did not replace all tools and equipment in all districts. That is not necessary and would be wasteful, not prudent, exorbitantly costly, and put a debilitating burden on operating costs. UNS Gas leadership and employees ensure all tools and equipment provided by the company are operated and maintained according to manufactures' procedures and operating instructs, and industry best practices.

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3. The Company clarifies that the physical replacement or disposal of an individual item of Account G394 equipment for operational reasons, including an item reaching the end of its physical useful life, does not result in recognition of an interim accounting retirement for that individual item.

Account G394, Tools, Shop and Garage Equipment, is accounted for using the vintage-year accounting methodology permitted under FERC Accounting Release No. 15 (AR-15). Under this methodology, qualifying general plant additions are recorded by vintage rather than individually unitized and tracked for retirement purposes. Consistent with AR-15, interim retirements of individual items within the vintage are not recognized.

Accordingly, G394 plant additions are accounted for by vintage and systematically retired when the applicable vintage becomes fully depreciated based on its in-service date and the Company's approved depreciable life. Account G394 currently has an approved depreciable life of 25 years. Therefore, the Company does not maintain individual accounting retirement dates corresponding to the physical replacement or disposal of each individual tool or piece of equipment.

As a result, to the extent the request assumes that an individual G394 item was retired from the Company's accounting records when that particular item reached the end of its physical useful life or was physically replaced or disposed of, that assumption is not consistent with the Company's vintage-year accounting treatment for G394 property under AR-15.

For additional information regarding the total amount included in the ARAM for Account G394 and the associated accounting retirements,

Please refer to the attached Excel file, RUCO 4.04 G394 Tools, Shop and Garage Equipment.xlsx.

4. There were no items purchased for individual district needs. Project 250940A is an administrative project used for several different reasons. One is to purchase tools and equipment at the company level that benefits all district operations. When purchasing the same tools and/or equipment that will benefit all the district operations equally at the same time, the Company will use this project for ease of procurement. The tools and/or equipment are then dispersed as needed, which could include all districts.

Tools and equipment purchased for use at the Administrative Office also use this project as it does not apply to individual district operations.

Specialized company support functions include Engineering, GIS, Cathodic Protection, Leak Survey, Pressure Control and Measurement, collectively referred to as Engineering and Technical Services. These functions and associate departments purchase and replace

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equipment for the same reasons listed above. However, these departments provide operational support to all districts, thus the reason to purchase at the administrative level.

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RUCO 4.05

Account G392-Transportation

Please provide the total amount included in the ARAM for Account G392 Transportation, along with a detailed breakdown by district, project, vehicle/equipment type, and cost. Explain how the Company determines when the asset should be replaced and disclose any related written policies, standards, or criteria; and, for each transportation-related asset included in the ARAM, please identify whether it replaces an existing asset or is a new addition.

For replacement vehicles or equipment, please provide:

1. A description of the vehicle or equipment replaced;
2. The original purchase or in-service date;
3. The age, mileage, or operating hours of the asset replaced, as applicable;
4. The reason for replacement; and
5. The actual cost of the replacement, including purchase price and any associated costs (if a cost is projected and not actual, please identify all projections).

For new vehicles or transportation equipment valued over \$20,000, please provide:

1. A description of the asset;
2. The district or location where the asset will be assigned;
3. An explanation of why the existing fleet cannot meet the identified need (i.e., identify the operational need for the new asset);
4. For vehicles, identify whether the Company considered purchasing used vehicles, as opposed to new, and if not why not;
5. The cost of each new asset; and
6. Please also identify any vehicles or transportation assets that are not assigned to a specific district and explain where they will be assigned or how they will be utilized.

RESPONSE:

The Company does not have a formal written policy establishing specific vehicle or equipment replacement requirements. Fleet Services uses the following informal criteria to identify units for annual review and potential replacement:

- Light-duty and medium-duty vehicles: 150,000 miles and/or 11 years old
- Heavy-duty vehicles: 150,000 miles and/or 15 years old
- Boom/bucket trucks: 150,000 miles and/or 12 years old
- Trailers and equipment: evaluated based on condition

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Units meeting the applicable criteria are reviewed annually for potential replacement. Meeting these criteria identifies a unit for review and does not, by itself, indicate that the unit will be replaced.

For Replacements and New Vehicle/Transportation Equipment:

See attached excel file: RUCO 4.05 Account G392-Transportation.xlsx

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RUCO 4.06

Self-Contained Breathing Apparatus (SCBA)

Please provide information regarding the Company's Self-Contained Breathing Apparatus (SCBA) equipment used across its districts. Please include:

1. The total number of SCBA units currently in service, broken down by district;
2. The frequency and circumstances in which SCBA units are used;
3. How SCBA equipment is managed, inspected, maintained, and tracked;
4. The expected useful life or replacement interval for SCBA equipment under the Company's applicable policies or standards;
5. The purchase date and original cost of the SCBA units currently in service, by district;
6. The date and quantity of the most recent SCBA purchases for each district;
7. The number of SCBA units included in the current ARAM request and the associated costs; and
8. For any SCBA units being replaced, identify the units being replaced, their age, the reason for replacement, and the applicable Company standard or criteria supporting the replacement.

RESPONSE:

1. The total number of SCBA units currently in service, broken down by district;

Every employee that is expected to or could respond to atmospheric conditions, termed IDLH (Immediately Dangerous to Life or Health), is provided with SCBA gear. Each "kit" includes an air tank with backpack, face mask, associated fittings, battery, storage bag, and electronic equipment for communicating and alarms.

Total in-service 100

Cottonwood	19
Flagstaff	17
Havas	9
Kingman	13
Nogales	7
Prescott	23
Show Low	12

2. The frequency and circumstances in which SCBA units are used;

SCBA equipment is required and used in IDLH (Immediately Dangerous to Life or Health) atmospheres. UNS Gas employees primarily use SCBA equipment in known oxygen deficient atmospheres typically found in blowing gas emergency response conditions. For example, in 2025, UNS Gas responded to 90 belowground excavation damages with blowing gas. UNS Gas employees may also be required to use SCBA

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equipment when above ground facilities are damaged resulting in blowing gas.

3. How SCBA equipment is managed, inspected, maintained, and tracked;

Each district manages their inspections, maintenance and recordkeeping. Inspections are logged every two weeks. Equipment is inspected and cleaned after each use and logged. Annually inspections include a "fit tested" to ensure face mask maintains airtight seal on the face and equipment is fully inspected. Air tanks are sent out and hydrotested (pressurized with water) every 5 years.

4. The expected useful life or replacement interval for SCBA equipment under the Company's applicable policies or standards;

SCBA air tanks are rated for 20 years. Air tanks are hydrotested a maximum of three times. Best practices assume the useful life of the masks and gear aligns with the tanks at 20 years. However, if the tanks or any gear shows signs of excessive wear or damage, is not working properly, or does not pass inspection, the equipment is replaced as necessary.

5. The purchase date and original cost of the SCBA units currently in service, by district;

The full replacement of all tanks, masks and gear was procured in two shipments in Q4 2025 and Q1 2026 to manage efficient rollout and training across all districts. Total cost for each kit = \$10,048

Cottonwood	\$190,914
Flagstaff	\$170,817
Havas	\$ 90,433
Kingman	\$130,625
Nogales	\$70,337
Prescott	\$231,106
Show Low	\$120,577

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6. The date and quantity of the most recent SCBA purchases for each district;

See #1 and #5. SCBA equipment (59) for Cottonwood, Flagstaff and Prescott were purchased in Q4 2025 and all remaining (41) were purchased in Q1 2026.

7. The number of SCBA units included in the current ARAM request and the associated costs;
and

100 SCBA units and \$1,004,809

8. For any SCBA units being replaced, identify the units being replaced, their age, the reason for replacement, and the applicable Company standard or criteria supporting the replacement.

The original set of SCBA gear and tanks were purchased in 2006 and 2007. Because air tanks expire after 20 years of use and three hydrotests, they were all set to be replaced. Other factors such as age of equipment, improvements in safety and available new technology, all SCBA kits were replaced with the tanks.

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RUCO 4.07

Main Relocation Costs and Cost Responsibility

Please identify and provide a detailed breakdown of all main relocation costs included in the current filing, including relocations associated with rights-of-way, franchise agreements, private property, construction activities, or other third-party requests or conditions.

For each relocation project, please provide:

1. The project name or number, location, and reason for the relocation;
2. The existing location and ownership or property status associated with the affected main;
3. The party or circumstance that necessitated the relocation;
4. The total cost of the relocation and the amount included for recovery from ratepayers;
5. Whether the old mains have been properly retired; and
6. Please also provide the Company's policies, procedures, or guidelines governing the allocation and recovery of main relocation costs and identify any circumstances under which the Company absorbs, shares, or seeks reimbursement for such costs.

RESPONSE:

1-5. See Excel File: RUCO 4.07 Main Relocation Costs and Cost Responsibility.xlsx.

6. UNS Gas is required to relocate gas mains occasionally due to several key reasons.

-Public Improvement (PI) projects. PI projects are municipal or state civil projects that typically include installation of new utilities such as water, sanitary and storm drains, new roads, sidewalks and curb and gutter, and large drainage improvement projects. UNS Gas has franchise agreements or utility permits with many government agencies. These agreements often require gas facilities to be relocated, if necessary, to accommodate improvements by the agency. UNS Gas must engineer and relocate the main to a suitable location and/or depth to accommodate the improvements and, unless the franchise agreement says otherwise, pay for all costs. All costs are recovered through rates.

-Right-of-ways, easements and other parties without a franchise or prior right. When UNS Gas mains are located within easements, rights-of-way or other private properties and easement language states prior rights, the UNS Gas can request reimbursement for all costs.

- Encroachments. When gas facilities are located on property without a franchise, permit, easement, or other such rights, UNS Gas must relocate the gas facilities or procure a legal right to be on the property.

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RUCO 4.08

District Cost

Please provide the total cost of all capital additions included in this ARAM for each district (e.g., Flagstaff, Prescott) in a table showing the district and total cost. For the Prescott District, please include:

- a. Location/description;
- b. Project cost; and
- c. Identify whether the project relates to a new addition or replacement.

Please provide a narrative explaining why the Prescott District, in particular, is seeing a significant increase in capital expenditures compared to all other districts.

RESPONSE:

a – c See attached Excel File: RUCO 4.08 District Cost.xlsx

The Prescott Gas District includes two cities that are experiencing continued residential and commercial growth. The entire area, also called the Prescott Quad-Cities, is also part of that growth. By size and population, the Prescott District is going to see larger cost numbers than other districts. In addition, note the total capital costs included a Blanket Task associated with the purchasing of residential and small commercial meters for all gas districts. This large number skews total capital costs higher for the Prescott District.

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RUCO 4.09

Revenue Requirement Increase Cumulative Effect

Your revenue requirement increase is \$6.1M. If, hypothetically, the Commission approves the request, would that mean that the Application for next year would include that \$6.1M? If there were increases every year, cumulatively before the next general rate case in the same amount, wouldn't the cumulative increase be approximately \$30M?

RESPONSE:

No. The approximately \$6.1 million revenue requirement increase requested in the 2026 ARAM filing would not automatically result in an additional \$6.1 million increase being included in future ARAM filings. Under the Commission-approved ARAM protocols, each annual update is based on the Company's actual earned return, rate base, revenues, and expenses for the applicable test period. Any future ARAM adjustment would be determined using the updated financial information for that annual filing and could result in an increase, decrease, or no adjustment at all.

Furthermore, the Company's 2026 ARAM filing reflects a longer period of regulatory lag than will be present in future annual updates. As explained in the filing cover letter, this initial ARAM filing captures approximately two years of operating cost changes since the June 30, 2024 test year used in the Company's most recent rate case, as well as an additional six months of cumulative rate base additions relative to future filings. Future ARAM updates will generally reflect only one year of cost changes and one year of cumulative rate base additions

Accordingly, it would not be reasonable to assume that future ARAM filings would produce revenue requirement increases of a similar magnitude or that annual increases would accumulate to approximately \$30 million before the next general rate case. Any future adjustment will depend on the Company's actual financial results, including earned return, operating expenses, capital investments, customer usage, and other factors reflected in the applicable annual update.

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RUCO 4.10

PGA Revenues and Expenses

There appear to be significant balances on the Purchased Gas Adjustor (PGA). The delta appears to be reflected in A-3 – can you please state whether that is the amount between the revenues and the credits? Are you taking those revenues and expenses out of the ARAM adjustor because they will flow through the PGA? Please confirm if so.

RESPONSE:

Yes. The PGA-related revenues and expenses are removed from the ARAM calculations because they continue to be recovered through the PGA mechanism rather than through the ARAM. Worksheet A3, Line 1 removes PGA revenues from operating revenues, and Worksheet A4, Line 1 removes PGA-related purchased gas costs from operating revenues. In addition, Worksheet A3, Line 8 removes PGA credits from operating revenues.

The amount shown on Worksheet A3, Line 11 is not simply the difference between PGA revenues and PGA credits. Rather, it reflects the combined effect of all revenue adjustments included on Worksheet A3, including but not limited to PGA revenues and PGA credits.

Accordingly, PGA revenues, PGA credits, and PGA related expenses are excluded from the ARAM because those items continue to flow through the PGA mechanism.

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RUCO 4.11

Following up on the Retail Revenues Adjustment

Please provide the workpaper for the Retail Revenues adjustment reflected on Line 6 in schedule A-3.

RESPONSE:

Please see the file titled RUCO 4.11 ARAM Support Final UNSG Rate Case Revenue Proof H Schedules G Schedules.xlsx.

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RUCO 4.12

Customer Communication

Does the Company know how the ARAM will appear on the bill? Will it be a separate line item? If the Company does not know how the ARAM will appear on the bill, what is the timeframe for the Company to make a decision about how the ARAM will appear on the bill?

RESPONSE:

Please see the draft mockup of the bill below.

CHARGES

DELIVERY SERVICES	
Basic Service Charge and Meter Charge includes ARAM	\$31.52
Delivery Charge 225.00 Therms @ \$0.34474 includes ARAM	\$77.57
GAS SUPPLY CHARGES	
Cost of Natural Gas Charge 225.00 Therms @ \$0.4487	\$100.96
ENERGY EFFICIENCY CHARGE	
LFCR 0.1884% of \$199.80	\$0.38
TAXES AND ASSESSMENTS	
ACC Assessment	\$0.47
City Franchise Fee	\$4.00
State Sales Tax	\$11.46
County Sales Tax	\$2.66
City Sales Tax	\$5.09
TOTAL CURRENT CHARGES - Gas Service	\$234.11

METER INFORMATION

Meter	Read Date	Reading	Metered CCF Used	Billing Factor	Billed Usage
1736861	6/4/2026	99,054	279	0.8055	225
(Prior)	5/5/2026	98,775			

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ACCOUNT DETAILS

Budget Billing: Available
Auto Pay: Available
Warm Spirit: Available
e-bill: Available
Visit uesaz.com for details about rates and programs.

CONTACT US

Online at uesaz.com/contact
Find quick answers or submit a request

Mail Correspondence to:
PO Box 711 Tucson, AZ 85702

Phone
For assistance or billing disputes, contact: (877) 837-4968
TTY for the Hearing Impaired: (800) 842-4681
Para Asistencia en Español: (877) 837-4968
Fax: (866) 666-3041

Customer Service Phone Hours
Monday to Friday, 7 a.m. to 6 p.m.
Automated Phone System
24 hours a day, 7 days a week

REPORT AN OUTAGE
Call (877) 837-4968 or log in to My Account at uesaz.com to submit a report online.

WAYS TO PAY

Online at uesaz.com
Log in to My Account and sign up for free payment options.

UniSource Mobile App
Download our free mobile app for iOS or Android devices from the App Store or Google Play.

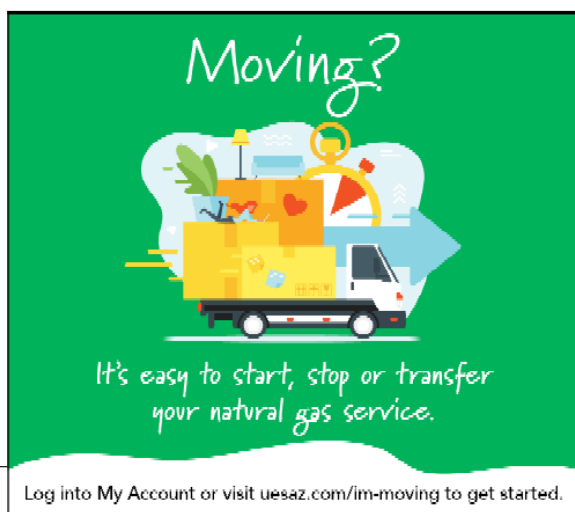
By Mail
Send payment to UNS GAS, INC
PO BOX 5213 Boone, IA 50950-0213

By Phone
Call (800) 284-9730 to pay by VISA, MasterCard, Discover, debit card, or electronic check. A fee will be charged for this service.

In Person
Payments are accepted at Walmart. For additional locations, visit uesaz.com. A fee will be charged for this service.

For more information about payment options visit uesaz.com/pay-my-bill.

REGULATORY AGENCY
Arizona Corporation Commission - azcc.gov
1200 W. Washington Phoenix, AZ 85007-2996
(602) 542-4251 (800) 222-7000



Arizona Corporation Commission ("Commission")
Tucson Electric Power Company ("TEP")
UNS Energy Corporation ("UNS")
UniSource Energy Services ("UES")

UniSource Energy Development Company ("UED")
UNS Electric, Inc. ("UNS Electric")
UNS Gas, Inc. ("UNS Gas" or the "Company")

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RUCO 4.13

Bill Inserts

Please provide true and accurate copies of the bill inserts sent to customers regarding the ARAM (from approximately July and September 2026).

RESPONSE:

Please see RUCO 4.13 682346 UES Gas Rates Insert - English & Spanish V3.pdf and RUCO 4.13 684940 UES ARAM Rates Insert FINAL.pdf for the true and accurate copies of the bill inserts sent to customers regarding the ARAM (from approximately July and September 2026).

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RUCO 4.14

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Pursuant to the ARAM protocols, Original Sheet 711-7, Section III.c.iv., which requires disclosure of “any other information that may reasonably have substantive effect on the calculation of the rates pursuant to the Formula Rate Template . . .”, please provide each rate schedule, please provide the test period non-gas base revenue split between (a) Basic Service Charge revenue and (b) Delivery Charge revenue, both at current rates and at current rates plus the proposed ARAM rates. Show the resulting percentage of non-gas revenue recovered through fixed charges for each class and compare it to the fixed and variable charges split approved in Decision No.81653.

RESPONSE:

Class revenue recovery figures are from the approved charges from Decision No. 81653.

Current Rates:	Recovery through Basic Service Charge (BSC)	Recovery through Delivery Charge	BSC Recovery %	Delivery Charge Recovery %
Residential	\$22,493,208	\$31,869,554	41%	59%
Small Volume Commercial Service	\$4,508,584	\$11,351,865	41%	59%
Large Volume General Service	\$271,589	\$6,899,315	4%	96%

UNSG's ARAM is a % charge that is the same for every rate component and class, thus the “fixed and variable charges split” as approved in Decision No. 81653 will be the same with the additional ARAM charge. Below is a re-created table that allocates the ARAM revenue recovery in the same manner as the split that was approved in Decision No. 81653. The \$6,074,440 comes from row 20 of the UNS Gas ARAM TY2026 file from the “A1-ARAM Lead” tab.

Current Rates + ARAM Allocation of \$6,074,440:	Recovery through Basic Service Charge (BSC)	Recovery through Delivery Charge	BSC Recovery %	Delivery Charge Recovery %
Residential	\$24,258,634	\$34,370,903	41%	59%
Small Volume Commercial Service	\$4,862,449	\$12,242,840	41%	59%
Large Volume General Service	\$292,905	\$7,440,822	4%	96%