

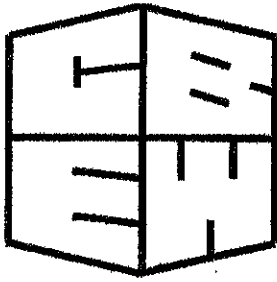
**KEYSTONE RURAL GAS DISTRICT #1
TULSA COUNTY
Sand Springs, Oklahoma**

**BASIC FINANCIAL STATEMENTS
October 31, 2024**

**KEYSTONE RURAL GAS DISTRICT #1
TULSA COUNTY
Sand Springs, Oklahoma**

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INDEPENDENT AUDITOR'S REPORT

December 5, 2024

Board of Directors
Keystone Rural Gas District No. 1
Tulsa County
Sand Springs, Oklahoma

Opinions

We have audited the accompanying financial statements of Keystone Rural Gas District No. 1, Tulsa County, Sand Springs, Oklahoma (the District), as of and for the years ended October 31, 2024 and 2023, and the related notes to the financial statements, as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the business-type activities of the Keystone Rural Gas District No. 1, Tulsa County, Sand Springs, Oklahoma as of October 31, 2024 and 2023, and the changes in financial position and cash flows thereof for the years then ended in conformity with accounting principles generally accepted in the United States of America.

Basis for Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the District and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Other Matters

Required Supplementary Information

The District has omitted Management's Discussion and Analysis that accounting principles generally accepted in the United States of America requires to be presented to supplement the basic financial statements. Such missing information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board (GASB), who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. Our opinions on the basic financial statements are not affected by this missing information.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 5, 2024, on our consideration of the Keystone Rural Gas District No. 1's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and results of that testing, and not to provide an opinion on the effectiveness of the District's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Keystone Rural Gas District No. 1's internal control over financial reporting and compliance.

CBEW Professional Group, LLP

CBEW PROFESSIONAL GROUP, LLP
Certified Public Accountants

KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma

STATEMENT OF NET POSITION
October 31, 2024 and 2023

	<u>October 31,</u> <u>2024</u>	<u>October 31,</u> <u>2023</u>
Current assets:		
Cash and cash equivalents (Note 1)	\$ 1,126,494	\$ 1,182,608
Investments (Note 1)	177,920	175,825
Receivables (net of allowance for uncollectible)	293	246
Accrued interest receivable	403	391
Prepaid insurance	12,653	10,803
Inventory	14,961	9,846
Total current assets	<u>1,332,724</u>	<u>1,379,719</u>
Capital assets:		
Buildings, gas system, equipment and vehicles net of depreciation (Note 2)	<u>298,251</u>	<u>268,178</u>
Total capital assets	<u>298,251</u>	<u>268,178</u>
Total assets	<u>\$ 1,630,975</u>	<u>\$ 1,647,897</u>
Deferred outflows of resources:		
Total deferred outflows	<u>-</u>	<u>-</u>
Current liabilities:		
Accounts payable	\$ 7,395	\$ 12,506
Accrued payroll	2,856	1,260
Accrued compensated absences	9,649	3,406
Payroll liabilities payable	6,287	5,781
Sales tax payable	10	10
Customer deposits	66,350	66,175
Total current liabilities	<u>92,547</u>	<u>89,138</u>
Total liabilities	<u>92,547</u>	<u>89,138</u>
Deferred inflows of resources:		
Total deferred inflows	<u>-</u>	<u>-</u>
Net Position:		
Net investment in capital assets	298,251	268,178
Unrestricted	<u>1,240,177</u>	<u>1,290,581</u>
Total net Position	<u>\$ 1,538,428</u>	<u>\$ 1,558,759</u>
Total liabilities and net position	<u><u>1,630,975</u></u>	<u><u>1,647,897</u></u>

The accompanying notes are an integral part of the basic financial statements.

KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma
STATEMENT OF ACTIVITIES
For the Years Ended October 31, 2024 and 2023

	<u>October 31,</u> <u>2024</u>	<u>October 31,</u> <u>2023</u>
Revenues:		
Gas sales	\$ 609,308	\$ 700,177
Late Fees	7,805	8,017
Meter Svc/Tap Fees	1,150	1,725
Other income	171	184
Total revenues	<u>618,434</u>	<u>710,103</u>
Expenses:		
Accounting and legal	15,486	15,004
Bad debt	-	-
Board Compensation	6,448	6,596
Contract services	1,663	-
Depreciation	39,862	27,677
Equipment Rental	-	-
Fuel	5,449	7,806
Gas purchases	168,638	160,030
Gas transportation costs	38,970	38,894
Insurance	53,533	43,751
Miscellaneous	25,904	10,090
Office supplies and postage	8,855	8,192
Payroll taxes	16,060	12,395
Postage	7,409	6,645
Repair and maintenance	48,754	56,596
Retirement contributions	3,952	1,055
Salaries	197,856	181,039
Telephone	4,858	3,867
Training/Education	11,098	8,312
Uniforms	5,189	4,804
Utilities	4,013	3,311
Total expenses	<u>663,997</u>	<u>596,064</u>
Operating income	<u>(45,563)</u>	<u>114,039</u>
Other income and expense:		
Interest income	16,732	10,649
Gain (loss) on sale of asset	8,500	-
Total other income and expense	<u>25,232</u>	<u>10,649</u>
Change in net position-Net income	<u>(20,331)</u>	<u>124,688</u>
Net position - beginning of year	<u>1,558,759</u>	<u>1,434,071</u>
Net position - end of year	<u>\$ 1,538,428</u>	<u>\$ 1,558,759</u>

The accompanying notes are an integral part of the basic financial statements.

**KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma**

**STATEMENT OF CHANGES IN NET POSITION
For the Years Ended October 31, 2024 and 2023**

	<u>Net Position (Unrestricted)</u>	<u>Net Position (Temporarily Restricted)</u>	<u>Total Net Position</u>
Balance - beginning of year 10/31/2023	\$ 1,558,759	\$ -	\$ 1,558,759
Change in net position	<u>(20,331)</u>	<u>-</u>	<u>(20,331)</u>
Balance - end of year 10/31/2024	\$ <u><u>1,538,428</u></u>	\$ <u><u>-</u></u>	\$ <u><u>1,538,428</u></u>

The accompanying notes are an integral part of the basic financial statements.

KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma
STATEMENT OF CASH FLOWS
For the Years Ended October 31, 2024 and 2023

	<u>October 31,</u> <u>2024</u>	<u>October 31,</u> <u>2023</u>
Cash flows from operating activities:		
Cash received from customers	\$ 611,422	\$ 710,948
Cash payments to suppliers for goods and contractors and other services	(620,726)	(569,466)
Net cash provided by operating activities	<u>(9,304)</u>	<u>141,482</u>
Cash flows from capital and related financing activities:		
Acquisition & construction of capital assets	(69,935)	(136,586)
Proceeds from sale of asset	8,500	-
Net cash used in capital and related financing activities	<u>(61,435)</u>	<u>(136,586)</u>
Cash flows from investing activities:		
(Purchase) liquidation of investments	(2,107)	(1,779)
Interest income	16,732	10,648
Net cash provided by investing activities	<u>14,625</u>	<u>8,869</u>
Net increase (decrease) in cash	(56,114)	13,765
Cash and cash equivalents at beginning of year	<u>1,182,608</u>	<u>1,168,843</u>
Cash and cash equivalents at end of year	<u>\$ 1,126,494</u>	<u>\$ 1,182,608</u>
Reconciliation of operation income to net cash provided by operating activities:		
Operating Income (loss)	\$ (45,563)	\$ 114,039
Adjustments to reconcile net income to net cash provided by operating activities:		
Depreciation	39,862	27,677
Changes in assets and liabilities:		
(Increase) decrease in accounts receivable	(47)	3,312
(Increase) decrease in prepaid expenses	(1,850)	(2,068)
(Increase) decrease in inventory	(5,115)	(399)
Increase (decrease) in customer deposits	175	1,840
Increase (decrease) in accounts payable	(5,111)	2,395
Increase (decrease) in sales tax payable	-	-
Increase (decrease) in accrued payroll payable	1,596	(5,749)
Increase (decrease) in accrued compensated absences payable	6,243	783
Increase (decrease) in payroll taxes payable	506	(348)
Total adjustments	<u>36,259</u>	<u>27,443</u>
Net cash provided by operating activities	<u>\$ (9,304)</u>	<u>\$ 141,482</u>

The accompanying notes are an integral part of the basic financial statements.

KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma

NOTES TO THE BASIC FINANCIAL STATEMENTS
October 31, 2024 and 2023

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Keystone Rural Gas District, Tulsa County, Oklahoma (the District), was created under the provisions of Title 82, O.S. 1981, Sections 1324.1-1324.26 inclusive, for the purpose of providing natural gas to the members it serves. Membership in the gas district consists of gas users who have paid the required membership and connection fees. The District is exempt from federal and state income taxes.

The more significant of the government's accounting policies are described below.

A. Reporting Entity

Keystone Rural Gas District No. 1 is an independent, self-contained reporting entity with no associated component units. It is operated in a manner similar to a private business enterprise where the cost (expenses, including depreciation) of providing gas services is financed through user charges. The District purchases the majority of its gas from Tiger, Inc.

B. Measurement Focus, Basis of Accounting and Basis of Presentation – Fund Accounting

The accompanying financial statements have been prepared on the accrual basis of accounting in accordance with Generally Accepted Accounting Principles (GAAP) promulgated in the United States of America. The accounting and financial reporting treatment is accounted for on a flow of economic resources measurement focus. With this measurement focus, all assets and liabilities associated with the operation are included on the statement of net assets. The operating statements present increases (e.g., revenues) and decreases (e.g., expenses) in net total assets. Depreciation expense is provided for capital assets based upon estimated useful lives.

C. Assets, Liabilities and Equity

1. Deposits and Investments

Oklahoma Statutes authorize the District to invest in certificates of deposit, repurchase agreements, passbooks, bankers' acceptances, and other available bank investments provided that all deposits are fully covered by approved securities pledged to secure those funds. In addition, the District can invest in direct debt securities of the United States unless such an investment is expressly prohibited by law.

All the bank deposits are held at one financial institution and are carried at cost. For purposes of statements of cash flows, the District considers cash and all highly liquid investments with an initial maturity of three months or less to be cash equivalents.

**KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
October 31, 2024 and 2023**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

C. Assets, Liabilities and Equity (Continued)

1. Deposits and Investments (Continued)

Custodial Credit Risk

At October 31, 2024 and 2023, the District held deposits of approximately \$1,304,109, and \$1,358,128 at financial institutions. The District's cash deposits, including interest-bearing certificates of deposit, are entirely covered by Federal Depository Insurance (FDIC) or direct obligation of the U.S. Government insured or collateralized with securities held by the District or by its agent in the District's name.

Investment Interest Rate Risk

The District does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

Investment Credit Risk

The District has no policy that limits its investment choices other than the limitation of state law as follows:

- a. Direct obligations of the U.S. Government, its agencies and instrumentalities to which the full faith and credit of the U.S. Government is pledged, or obligations to the payment of which the full faith and credit of the State is pledged.
- b. Certificates of deposits or savings accounts are either insured or secured with acceptable collateral with in-state financial institutions, and fully insured certificates of deposit or savings accounts in out-of-state financial institutions.
- c. With certain limitation, negotiable certificates of deposit, prime bankers' acceptances, prime commercial paper and repurchase agreements with certain limitations.
- d. County, municipal or school district tax supported debt obligations, bond or revenue anticipation notes, money judgments, or bond or revenue anticipation notes of public trusts whose beneficiary is a county, municipality or school district.
- e. Notes or bonds secured by mortgage or trust deed insured by the Federal Housing Administrator and debentures issued by the Federal Housing Administrator, and in obligations of the National Mortgage Association.
- f. Money market funds regulated by the SEC and in which investments consist of the investments mentioned in the previous paragraphs (a.-d.).

The investments held at October 31, 2024 are as follows:

Type	Weighted Average Maturity (Months)	Credit Rating	Market Value	Cost
Investments				
Certificate of deposit	10.47	N/A	177,920	177,920
Total investments			<u>\$ 177,920</u>	<u>\$ 177,920</u>

**KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
October 31, 2024 and 2023**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

C. Assets, Liabilities and Equity (Continued)

1. Deposits and Investments (Continued)

Concentration of Investment Credit Risk

The District places no limit on the amount it may invest in any one issuer. The District has the following of credit risk: 100% in Certificates of deposit.

2. Fair Value of Financial Instruments

The District's financial instruments include cash and cash equivalents, accounts receivable, accounts payable and notes payable. The District's estimate of the fair value of all financial instruments does not differ materially from the aggregate carrying values of its financial instruments recorded in the accompanying statement of net assets. The carrying amount of these financial instruments approximates fair value because of the short maturity of these instruments.

3. Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities, and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Accordingly, actual results could differ from those estimates.

4. Inventories

Inventories consist primarily of gas line supplies for the addition of new gas lines and repair of old gas lines. Inventory is valued at cost, principally on a first-in, first-out basis, but not in excess of market.

5. Capital Assets

Additions to the gas storage delivery system and other equipment are recorded at cost or, if contributed property, at their estimated fair value at time of contribution. Repairs and maintenance are recorded as expenses; renewals and betterments are capitalized. Non-cash contributions relate to both existing and new members of the District. If installation of gas lines is required to a member's property, the District performs this service for the member at cost. The member's payment for such installation is recorded as a capital asset contribution. The District maintains a capitalization threshold of \$500 and an estimated useful life in excess of two (2) years.

Depreciation has been calculated on each class of depreciable property using the straight-line method. Estimated useful lives are as follows:

Gas system	10-50 years
Buildings	10-25 years
Equipment	7-20 years
Office equipment	7-10 years
Vehicles	5 years

**KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
October 31, 2024 and 2023**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

C. Assets, Liabilities and Equity (Continued)

6. Compensated Absences

It is the District's policy to permit employees to accumulate earned but unused vacation and sick time. Full-time employees are granted vacation and sick leave benefits in varying amounts to specified maximums depending on tenure. The expense and related liability for vacation benefits is recorded in the financial statements.

7. Customer Deposits

The District requires that every customer pay a cash deposit upon opening or re-establishing an account with the District to guarantee payment on the account for gas service rendered. When the service is terminated, the deposit is refunded or applied to the outstanding balance due the District. The District maintains a cash reserve sufficient for payment of these deposits. The reserve amount is included in the District's cash and cash equivalents. Interest earned on customer deposits is used for operations of the District.

D. Revenues, Expenses and Other Changes in Net Assets

1. Operating Revenues and Expenses

Operating revenues and expenses are principally from gas sales and connection fees charged to new system subscribers. Customer gas consumption is determined by monthly meter readings taken by District personnel. The gas sales from subscriber gas consumption billed but unpaid at the District's year-end are recognized as revenue in the current year and reported in the statement of net assets as accounts receivable. Operating expense consist of those costs necessary to operate and maintain the gas distribution system and for general administration of the District.

2. Non-Operating Revenue and Expenses

Non-operating revenues and expenses consist of investment earnings, interest expense incurred on the District's notes payable and gains and losses on sales or the abandonment of long-lived assets.

3. Bad Debts

The District uses the direct write-off method for recognizing bad debts. Under the direct write-off method, accounts receivable are charged to income during the period they are determined to be uncollectible. The use of this method does not result in a material difference from the valuation method required by generally accepted accounting principles.

KEYSTONE RURAL GAS DISTRICT NO. 1
TULSA COUNTY
Sand Springs, Oklahoma

NOTES TO THE BASIC FINANCIAL STATEMENTS
October 31, 2024 and 2023

2. CAPITAL ASSETS

The following is a summary of changes in property, plant and equipment.

	Balance October 31, 2023	Additions	Deletions	Balance October 31, 2024
Buildings	166,457	-	-	166,457
Gas System & Equipment	1,267,241	-	-	1,267,241
Office equipment	19,736	6,671	-	26,407
Vehicles	61,953	63,264	26,805	98,412
Total	1,515,387	69,935	26,805	1,558,517
Less accumulated depreciation	1,247,209	39,862	26,805	1,260,266
Net	\$ 268,178	\$ 30,073	\$ -	\$ 298,251

	Balance October 31, 2022	Additions	Deletions	Balance October 31, 2023
Buildings	140,977	25,480	-	166,457
Gas System & Equipment	1,156,135	111,106	-	1,267,241
Office equipment	19,736	-	-	19,736
Vehicles	61,953	-	-	61,953
Total	1,378,801	136,586	-	1,515,387
Less accumulated depreciation	1,219,533	27,676	-	1,247,209
Net	\$ 159,268	\$ 108,910	\$ -	\$ 268,178

3. DEFERRRED COMPENSATION AND PENSION PLAN

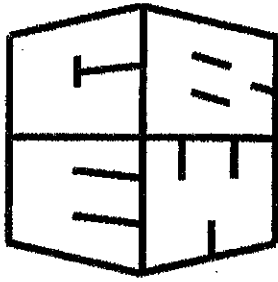
The District offers a simple individual retirement plan for employees. The District has approved a contribution to the employee's Simple IRA account each month. Employees are allowed to contribute a portion of their own salary each month with a 3% match by the District. All amounts are 100% vested at the date of contribution. The District's contributions to the plan for October 31, 2024 and 2023 were \$1,055 and \$3,952.

4. RISK MANAGEMENT

Keystone Rural Gas District No. 1 is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The District continues to carry commercial insurance for these risks, including general and auto liability, property damage, and public officials liability. Settled claims resulting from these risks have not exceeded the commercial insurance coverage in any of the past three fiscal years.

**KEYSTONE RURAL GAS DISTRICT #1
TULSA COUNTY
Sand Springs, Oklahoma**

**REPORT REQUIRED BY *GOVERNMENT AUDITING STANDARDS*
October 31, 2024**



CBEW Professional Group, LLP

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INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

December 5, 2024

Board of Directors
Keystone Rural Gas District No. 1
Tulsa County
Sand Springs, Oklahoma

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the business-type activities of the Keystone Rural Gas District No. 1, Tulsa County, Sand Springs, Oklahoma (the District), as of and for the year ended October 31, 2024, and the related notes to the financial statements, which collectively comprise the District's basic financial statements, and have issued our report thereon dated December 5, 2024. The District did not present the Management's Discussion and Analysis required by the Governmental Accounting Standards Board.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, we do not express an opinion on the effectiveness of the District's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or, significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. We did identify certain deficiencies in internal control, described in the accompanying schedule of findings and responses that we consider to be material weaknesses as findings 2024-001 and 2024-002.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Association's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

District's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the District's response to the findings identified in our audit is described in the accompanying schedule of findings and responses. The District's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this report is not suitable for any other purpose.

CBEW Professional Group, LLP

CBEW Professional Group, LLP
Certified Public Accountants

**KEYSTONE RURAL GAS DISTRICT #1
TULSA COUNTY
Sand Springs, Oklahoma**

**SCHEDULE OF FINDINGS AND RESPONSES
For the Year Ended October 31, 2024**

2024-001. Internal Control – Segregation of Duties

Criteria: The segregation of duties and responsibilities between different individuals for custody of assets, recordkeeping for those assets and reconciliation of those asset accounts is an important control activity needed to adequately protect the entity's assets and ensure accurate financial reporting.

Condition: Presently the same individual that receives utility service-related cash payments is also responsible for service billing and adjustment, also balances the daily cash drawer, posts payments to subsidiary accounts receivable ledger and reconciles the monthly bank statements. In addition, only limited oversight is provided over this individual in the conduct of their daily functions. This finding was also noted in 2023.

Cause: The district's limited size and staffing resources have made it difficult for management to provide sufficient staffing to fully segregate incompatible duties in a cost-effective manner.

Effect or Potential Effect: Without sufficient segregation of duties, the risk significantly increases that errors and fraud related to utility billing and collection activities, including misappropriation of assets, could occur and not be detected within a timely basis.

Recommendation: We recommend that management and the board should consider a formal evaluation of their risks associated with this lack of duties segregation over utility cash and receivables. In response to the identified risks, consideration should be given to identifying and implementing controls that could help mitigate the risks associated with lack of segregation of duties, such as providing increased management oversight and an independent reconciliation of accounts. For example, the entity might consider soliciting the assistance of independent volunteer labor to perform certain functions as compensating procedures where applicable.

Responsible Official's Response: The district concurs with the recommendation, although, the cost to correct this condition might exceed the benefit, the district has made certain changes in procedures that will improve the overall lack of segregation of duties and has implemented compensating procedures as appropriate.

2024-002. Internal Control – Material Adjusting Journal Entries

Criteria: The government's management is responsible for internal controls over accounting and financial reporting. This responsibility includes the design and implementation of controls over the fair and complete presentation of the government's annual financial statements in accordance with generally accepted accounting principles (GAAP) from trial balances derived from the government's accounting records. For trial balances to be both complete and accurate, the government must have effective internal controls over recording, processing, summarizing, and adjusting accounting data. As evidence of effective internal controls over accounting and financial reporting, there should generally be few, if any, material adjustments to the trial balances required that are detected and corrected solely as a result of the financial statement audit. In other words, government management should not rely on the external auditor to detect and correct material misstatements in the books and records as part of its internal controls, but rather should have its own procedures designed and in place that are independent of the external auditor to provide reasonable, although not absolute, assurance that material misstatements will be detected and corrected in its trial balances prior to audit.

Condition: The government's trial balances for the year ended October 31, 2024, required a number of material adjusting journal entries in order for the financial statements to be prepared in accordance with GAAP. These necessary adjusting entries, identified solely as a result of the financial statement audit, included such adjustments as the following: fixed asset purchases, inventory and accounts receivable. This finding was also noted in 2023.

**KEYSTONE RURAL GAS DISTRICT #1
TULSA COUNTY
Sand Springs, Oklahoma**

**SCHEDULE OF FINDINGS AND RESPONSES
For the Year Ended October 31, 2024**

Cause: The government's accounting and financial reporting staff lacks the necessary expertise, relative to the complex nature of applying GAAP applicable to state and local governments, sufficient to provide reasonable assurance that the trial balances used for preparing the GAAP financial statements are complete and accurate prior to audit. As a result, management has had to rely on the external auditors to identify and correct a number of material misstatements in the trial balances.

Effect or Potential Effect: As a result of this condition, without reliance on its external auditors, the government lacks the necessary internal controls over the completeness and accuracy of the trial balances that are used in the preparation of its financial statements in accordance with GAAP. This condition can result in undetected and uncorrected material misstatements in the financial statements that are not detected by management and may also not be detected by the financial statement audit. In addition, if management's intentions are to continue to rely on the external auditor to detect and correct material misstatements, this condition could place the auditor in a questionable position regarding auditor independence as a result of the auditor performing part of management's functions in regards to the trial balances.

Recommendation: The government should consider designing and implementing sufficient internal controls over the completeness and accuracy of trial balances by obtaining the necessary expertise and continuing education to apply GAAP in the development of working trial balances that will be used to prepare the government's annual financial statements. This could be achieved through employment of qualified accounting staff or the outsourcing of these control activities to a qualified accounting firm other than the external auditor.

Responsible Official's Response: The District concurs with the recommendation and will strive to prepare and post material adjusting journal entries to the financial statements.