

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Complaint Against  
**Atmos Energy by DH Pace Co.** located at:  
1901 E 119<sup>th</sup> St., Olathe, KS 66061  
Account #4002613056  
Meter #1017345

Docket No. 16-ATMG-049-COM

Firstly, let me thank you for reviewing DH Pace's complaint. My client and I are in a difficult position and I have great faith in the Kansas Corporation Commission's ability to find an agreement that all parties can feel good about.

The following exhibit, showing true numbers, is meant to provide some clarity to the overall intent of the complaint; to prove that the volumes charged to DH Pace by Atmos Energy were not actuals, they were estimates.

Exhibit D-1 includes November-December of 2015, showing a full 12 month comparison of ACTUAL usage in 2015 vs. ESTIMATED usage in 2014.

The usage for 2013 and 2015 are actual metered numbers. It is undeniable that the volume charged in 2014 is not only estimated, but also exaggerated. A difference of over 27,000 CCF was found. Keep in mind that there have been no operational changes in that time. Weather can account for a small variance, but not one that amounts to more than half of the actual usage the following year.

Please let me know of any questions you may have as we want to swiftly resolve this matter.

Cordially,



Leah Battista  
(913) 333-3713

# Usage Comparison - Actual vs. Estimate

D-1

Xpedx/IPC Usage Actuals 2013	
Jan-13	11,610
Feb-13	10,370
Mar-13	10,020
Apr-13	2,370
May-13	430
Jun-13	20
Jul-13	10
Aug-13	240
Sep-13	350
Oct-13	Estimated
Nov-13	Estimated
Dec-13	Estimated

Total (CCF)	35,420
-------------	--------

**ACTUAL**

DH Pace Actuals 2015	
Jan-15	9,084
Feb-15	13,829
Mar-15	8,427
Apr-15	1,472
May-15	1,795
Jun-15	8
Jul-15	10
Aug-15	50
Sep-15	130
Oct-15	1,400
Nov-15	4,570
Dec-15	4,389

Total (CCF)	45,164
-------------	--------

**ACTUAL**

DH Pace Estimates 2014	
Jan-14	6,372
Feb-14	5,775
Mar-14	5,775
Apr-14	5,974
May-14	6,372
Jun-14	5,775
Jul-14	5,974
Aug-14	6,372
Sep-14	5,974
Oct-14	5,775
Nov-14	5,576
Dec-14	6,970

Total (CCF)	72,684
-------------	--------

**ESTIMATED**

**Difference**

**27,520 CCF**