

**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 119th St., Olathe, KS 66061
Account #4002613056
Meter #1017345

Docket No. 16-ATMG-049-COM

FORMAL COMPLAINT

Background Information

DH Pace contacted Atmos Energy on Oct. 18th, 2013 to submit a change in occupancy request to move the Atmos account into their name. No invoice was received by DH Pace for Natural Gas usage from the change of occupancy date to the end of 2014. In December of 2014 DH Pace contacted Atmos to let them know that they had never received a bill. The following week a meter read was taken and DH Pace was billed for usage determined using a beginning and ending meter read that spanned over 13.5 months.

Explanation of Bills – Refer to Exhibit A (1-12)

On January 19th, 2015 Atmos Energy created 12 separate monthly bills that show the usage over 12 months, January 2014 – December 2014. These bills were mailed to DH Pace with no cover letter or any explanation of how the amounts were determined and/or estimated.

Upon review of the bills, the following errors were found:

1. The first bill ever created for DH Pace by Atmos energy depicted usage from 12/27/2013 – 1/27/2014. This bill had a previous balance of \$6,634.69 (See Exhibit A1).
2. All 12 bills show different dates of service and varying usage amounts, but all share the same billing date (January 1st, 2015) and due date for payment (February 3rd, 2015). Atmos sent 12 months of bills to the customer, provided no explanation of usage or charges, and gave them less than 30 days to pay the total amount before it would be considered past due.

DH Pace paid the total of the 12 inflated bills on February 1st, 2015 in the amount of \$68,449.05 (See Exhibit B). At the end of March 2015 DH Pace hired Managed Energy Systems to complete an Energy Review for their facility. It was at that time that Managed Energy Systems realized multiple billing discrepancies.

Usage Estimating Procedures

DH Pace is a winter user; they should not have substantial usage over the summer months. The exaggerated Atmos bills from January 2014-December 2014, painted a very different picture. See Exhibit G for a breakdown of the usage totals.

Following this discovery, Vlad Kaufman, the President of Managed Energy Systems, contacted Kevin Jones at Atmos via email. Kevin Jones agreed to meet with Managed Energy Systems at the end of April 2015 to discuss this specific customer. During the meeting Kevin explained that the bills were determined using a beginning and ending meter read. The beginning meter read taken November 12th, 2013 was 1095. The ending meter read taken on 12/26/2014 was 82,541. None of this was ever explained to the customer and no supporting documentation was provided.

Managed Energy Systems compared the billed volumes with the expected volumes. Estimates were calculated following these procedures:

1. DH Pace's Modern EMS System estimates using a square footage estimation
 - a. .020 MCF per square foot for 65,000 sq ft. office
 - b. .022 MCF per square foot for a 160,000 sq ft. warehouse
 - i. Total Estimated Annual Usage would be **48,200 CCF/year**
2. Previous occupants' usage history was approximately **40,000 +/- year**. This amount was confirmed with both Xpedx (previous tenant) and the previous gas marketer.
 - a. Last winter use was:
 - i. **11,061 CCF (Jan'13), 10,037 CCF (Feb'13), 1,002 CCF (Mar'13)**
3. A Usage Analysis was done based on the ACTUAL usage by DH Pace for Jan & Feb 2015 – the outcome was an estimated total of **35,000 CCF/year**.
 - a. **9,080 CCF (Jan'15) & 10,545 CCF (Feb'15)**
 - b. The bill for April 2015 was again an estimated amount, no meter read was taken.
 - i. How was the bill for March 2015 estimated? What process was used? It was again an exaggerated amount.

Based off of this information, we concluded the estimated usage should have been in a range of **35,000-48,200 CCF/year**, not Atmos Energy's estimated amount of **72,684 CCF/year**. Refer to Exhibit J for details.

The employee at Atmos who completed the estimated monthly bills on January 19th, 2015 is no longer employed by Atmos. Proof of the meter reads, estimation calculations, date of Change in Occupancy and the ending meter read for the previous tenant was requested. Managed Energy Systems never received any of the requested information and Atmos energy was not willing to revise the estimated monthly bills using the proper estimation procedures. (See Exhibit

The following Tariffs were not followed by Atmos Energy when determining usage estimates on back-billing for DH Pace.

1. **Atmos Tariff Section F.1.** – If the Premise to be estimated has 24 consecutive months of billing history then estimated consumption will be calculated using the “least – lines – Squared” method of estimation, whereby the 24 months of consumption, along with the heating degree days for each consumption period, establishes a relationship between the gas consumed compared to the number of heating degree days for each given period, and calculates the estimation by using this factor times the current number of heating degree days for the period being estimated.
2. **Atmos Tariff Section F.2.** – If the Premise to be estimated does not have 24 consecutive months of billing history then the estimated consumption will be calculated using the “average consumption” method, whereby the previous year same month usage, the previous year following month usage, the previous 2nd year same month usage and previous 2nd year following month usage are added together and an average is calculated that will be used for the estimated usage.
3. **Atmos Tariff Section F.3.** – If neither of the conditions in F,1, or F,2, exist then a manual process will be initiated that will include, but not be limited to, the comparison of neighbors’ actual or estimated usage for the same period that this Premise is to be estimated.

Bill Contents

The 12 bills that were created on January 19th, 2015 and mailed to DH Pace were all estimated. The meter reads and dates were all forged. The usage on the bills was portrayed as actual meter reads, not estimations.

According to the Tariffs, estimating is ok and allowed in certain situations, but the customer must be made aware of the estimation.

1. Atmos Energy billed DH Pace for 12 consecutive months of estimated billing. Refer to (Section 4.G.5), bills cannot be estimated for more than (3) consecutive months.
2. None of the 12 months of back billing indicated that the usage amounts were estimated. All 12 bills state “Actual Usage in CCF.” (Section 4.B.1.a & Section 4.G.6.b)
3. None of the 12 months of back billing included an “amount due after delinquency.” (Section 4.B.e)
4. All 12 months of back-billing had different PGA amounts. Each bill had a billing date of 1/19/2015, so the PGA amount should have been .51033 with no hedge factor included. Refer to (Section 4.G.8). The cost difference between the estimating procedure Atmos should have used compared to the correct procedure is over \$12,000. See Exhibit H for details.

Atmos Tariff Section 4.B.a. – the beginning and ending meter registration for the reading period, except that an estimated billing shall disclose that it is based on estimated usage: and the word “ESTIMATED” will be shown on the bill.

Atmos Tariff Section 4.B.1.e – the bill should show the amount due for prompt payment and the amount due after delinquency in payment.

Atmos Tariff Section 4.B.5 – The Company will not render a bill based on estimated usage for more than (3) three consecutive billing periods...

Atmos Tariff Section 4.G.6.a – Maintains accurate records of the reasons therefore and efforts made to secure an actual reading.

Atmos Tariff Section 4.G.6.b – Clearly disclose on the bill that it is based on estimated usage.

Atmos Tariff Section 4.G.8 – Purchase gas cost adjustments covering more than a one month period shall be based on the most recent adjustment clause calculation filed with the commission.

In the time since the informal complaint was submitted, DH Pace as received 2 more bills. One dated 05/12/15 (Exhibit D) and one dated 6/30/2015 (Exhibit E). The bill dated 5/12/15 was estimated at more than 50% of what the actual usage was (Exhibit D). The following bill (Exhibit E) was a bill for estimated usage from 3/27/2015-6/24/15.

Exhibit E states that Exhibit D was a canceled bill and usage for those dates is accounted for on the new estimated bill for 3 months of service. DH Pace had already paid the bill dated 5/12/15, so that amount was credited toward the total of the new bill, leaving a credit on the account of \$1,251.54. The bill was estimated for 3 full months, and 3 separate PGA amounts were used on the same bill.

Atmos Energy did not follow tariff 4.G.8 when estimating gas usage for the 3 combined months of estimated usage.

Meter Reading Periods

DH Pace was billed for 12 consecutive months and the usage was based on 2 meter reads taken over a span of 13 months. (November 2013 & December 2014).

Atmos Tariff Section 4.C – Unless otherwise provided in the Rate Schedules, meters shall be read in a range of no less than 26 days and no more than 36 days for monthly billing. The Company may vary its meter reads from this period to take into account the effects of connections, disconnections, and for customers directly affected by rerouting.

The range of days between the meter reads for DH Pace is more than 10 times the approved 36 days. The bills were sent to DH Pace in a monthly format that falsely stated the meter read dates.

Information from KSCC on behalf of Atmos Energy

A request was made to both the KS Corporation Commission and to Atmos Energy to provide validation of the beginning and ending meter reads. Please refer to exhibit I , I-1, & I-2.

Upon reviewing the documents, the following discrepancies were noted:

1. The letter mentioned the meter had "rolled over" at some point, but no dates or further information was given. If the meter "rolled over" it would need to have an older model reader that rolls over at 999,999. The reader currently attached to the meter is digital.
2. The digital meter carries a 4 year battery life. If the digital reader were installed 6/15/10, then the battery would have died at some point between Nov. 2013 and Dec 2014, during the time in which the meter was not being read.
3. Exhibit I-1 states Dead MTR, VFY MTR INFO. There is not date associated with this note. Screen Shot also states: LAST READ @ MVN in NOV 2014. PLS CHECK MTR, AND NOTE ALL INFO INCLUDING READ THANKS. I believe this was a typo because the last read we were ever told about was NOV 2013. By looking only at these notes with no dates it seems that the meter was DEAD long before November 2014. The notes in I-1 also don't have an accurate serial #.

The information provided by the Corporation Commission on behalf of Atmos Energy did not provide any confirmation of the meter reads or exaggerated estimates. Instead the information lead to further questions on when and how the meter reads took place.

Requested Information

Previous requests for information have not been carried out by Atmos. We are now submitting a formal request for the following documentation:

1. Provide documentation that validates both the beginning (Nov'13) and ending (Dec'14) meter reads.
2. Provide documentation that shows the final meter read for the previous tenant.
3. What prompted the meter read taken Mid-November 2013? All other bills show the reads as being taken toward the end of the month.
4. Provide proof of change of occupancy.
5. Email from Corporation Commission said that meter was installed 6/10/15 and "rolled over" at some point. Please provide record of any repairs and/or parts replaced on the meter post install date.
6. The very first bill that DH Pace ever received from Atmos shows a previous balance. Where did that balance come from? Why did you charge the customer for a previous balance that they were never billed for to begin with?
7. Why was the bill for April 2015 estimated? What estimating procedure was used to determine estimated usage?
8. Why were the bills for April-June 2015 estimated? What prompted the original bill to be cancelled and the new bill to have 3 different estimated months on it?
9. Is there any documentation that states "cause for estimation?"

Expected Resolution

1. The full \$68,449.05 refunded to DH Pace for the fabricated bills.
2. Any consulting or legal fees DH Pace paid to 3rd party to determine the misrepresentation of usage estimates are paid by Atmos Energy.

Managed Energy Systems tried to work with Atmos Energy on revising the estimated bills to a realistic usage amount, but they declined. Managed Energy Systems then tried to come to an agreement through an informal complaint and was told that we did not have a case because Atmos had a beginning and ending meter read. There is much more to this complaint than a beginning and ending meter read. This complaint is about a regulated utility willfully neglecting its tariffs.

Leah Mulley

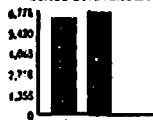


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001000401965

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	12/27/13	1/27/14	9857	16229
	Read Difference			6372.00
	Actual Usage in CCF			6372.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

Atmos Energy encourages customers who are having difficulty paying their energy bills to apply today for energy assistance funds. A local energy-assistance agency can help determine if you qualify and then can help you sign up.

Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,700) are eligible for grants under the Atmos Energy "Share the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-568-2769, Ext. 403.

BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 6634.69

CURRENT GAS CHARGE TOTAL 4536.21
COMMERCIAL

Facility Charge 37.75
COM Commodity Cost @ 0.137/CCF 872.96
PGA @ 0.53034/CCF 3379.33
WNA Factor @ 0.00550000-/CCF 35.05-
Franchise Fee @ 0.052632 226.81
AD Valorem Surcharge @ 0.0084/CCF 53.52
GSRS Surcharge 0.89

TAX/FEE CHARGE TOTAL 402.59

State Sales Tax @ 0.06150 278.98
County Sales Tax @ 0.01225 55.57
City Sales Tax @ 0.01500 68.04

CURRENT CHARGES

4938.80

TOTAL AMOUNT DUE

11573.49

MAP 52600

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

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Exhibit A-1

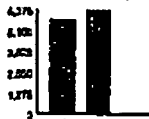


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001000431966

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	1/28/14	2/25/14	16229	22004
	Read Difference			5775.00
	Actual Usage in CCF			5775.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

Atmos Energy encourages customers who are having difficulty paying their energy bills to apply today for energy assistance funds. A local energy-assistance agency can help determine if you qualify and then can help you sign up.

Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,700) are eligible for grants under the Atmos Energy "Share the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-566-2769, Ext. 403.

BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 11573.49

CURRENT GAS CHARGE TOTAL 4244.91
COMMERCIAL

Facility Charge	37.75
COM Commodity Cost @ 0.137/CCF	791.18
PGA @ 0.55284/CCF	3192.65
WNA Factor @ 0.00550000-/CCF	31.76
Franchise Fee @ 0.052632	212.25
AD Valorem Surcharge @ 0.00696/CCF	40.19
GSRS Surcharge	2.65

TAX/FEE CHARGE TOTAL 376.73

State Sales Tax @ 0.06150	261.06
County Sales Tax @ 0.01225	52.00
City Sales Tax @ 0.01500	63.67

CURRENT CHARGES

4621.64

TOTAL AMOUNT DUE 16195.13

MAP 52601

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

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Exhibit A-2

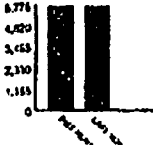


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001000401974

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	2/26/14	3/26/14	22004	27779
	Read Difference			5775.00
	Actual Usage in CCF			5775.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

Almos Energy encourages customers who are having difficulty paying their energy bills to apply today for energy assistance funds. A local energy-assistance agency can help determine if you qualify and then can help you sign up.

Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,700) are eligible for grants under the Almos Energy "Share the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-588-2769, Ext. 403.

BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 16195.13

CURRENT GAS CHARGE TOTAL 5396.81
COMMERCIAL

Facility Charge 37.75
COM Commodity Cost @ 0.137/CCF 791.18
PGA @ 0.74233/CCF 4286.96
WNA Factor @ 0.00550000-/CCF 31.76-
Franchise Fee @ 0.052632 269.84
AD Valorem Surcharge @ 0.00696/CCF 40.19
GSRS Surcharge 2.65

TAX/FEE CHARGE TOTAL 478.96

State Sales Tax @ 0.06150 331.90
County Sales Tax @ 0.01225 66.11
City Sales Tax @ 0.01500 80.95

CURRENT CHARGES

5875.77

260.53400.950

TOTAL AMOUNT DUE 22070.90

MAP 52602

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

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001000401979

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	3/27/14	4/25/14	27779	33753
	Read Difference			5974.00
	Actual Usage in CCF			5974.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

Atmos Energy encourages customers who are having difficulty paying their energy bills to apply today for energy assistance funds. A local energy-assistance agency can help determine if you qualify and then can help you sign up.

Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,700) are eligible for grants under the Atmos Energy "Share the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-586-2789, Ext. 403.

BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 22070.90

CURRENT GAS CHARGE TOTAL 5666.33
COMMERCIAL

Facility Charge	37.75
COM Commodity Cost @ 0.137/CCF	818.44
PGA @ 0.69452/CCF	4149.06
WNA Factor @ 0.00550000-/CCF	32.86
Franchise Fee @ 0.052632	283.32
Gas Hedge Factor @ 0.06133/CCF	366.39
AD Valorem Surcharge @ 0.00696/CCF	41.58
GSRG Surcharge	2.65

TAX/FEE CHARGE TOTAL 502.88

State Sales Tax @ 0.06150	348.48
County Sales Tax @ 0.01225	69.41
City Sales Tax @ 0.01500	84.99

CURRENT CHARGES 6169.21

TOTAL AMOUNT DUE 28240.11

MAP 52603

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

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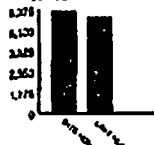


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001000401962

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	4/26/14	5/27/14	33753	40125
	Read Difference			6372.00
	Actual Usage In CCF			6372.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

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BEWARE OF CARBON MONOXIDE

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Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 28240.11

CURRENT GAS CHARGE TOTAL 5226.71
COMMERCIAL

Facility Charge 37.75
COM Commodity Cost @ 0.137/CCF 872.96
PGA @ 0.57312/CCF 3651.92
WNA Factor @ 0.00550000-/CCF 35.05-
Franchise Fee @ 0.052632 261.34
Gas Hedge Factor @ 0.06133/CCF 390.79
AD Valorem Surcharge @ 0.00696/CCF 44.35
GSRIS Surcharge 2.65

TAX/FEE CHARGE TOTAL 463.87

State Sales Tax @ 0.06150 321.44
County Sales Tax @ 0.01225 64.03
City Sales Tax @ 0.01500 78.40

CURRENT CHARGES

5690.58

260 53400.950

TOTAL AMOUNT DUE 33930.69

MAF 52604

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

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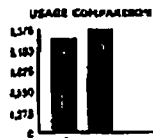
Exhibit A-5



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COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	5/28/14	6/25/14	40125	45900
	Read Difference			5775.00
	Actual Usage in CCF			5775.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

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Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 33930.69

CURRENT GAS CHARGE TOTAL 4372.02
COMMERCIAL

Facility Charge	37.75
COM Commodity Cost @ 0.137/CCF	791.18
PGA @ 0.51242/CCF	2959.23
WNA Factor @ 0.00550000-/CCF	31.76
Franchise Fee @ 0.052632	218.60
Gas Hedge Factor @ 0.06133/CCF	354.18
AD Valorem Surcharge @ 0.00696/CCF	40.19
GSRS Surcharge	2.65

TAX/FEE CHARGE TOTAL 388.02

State Sales Tax @ 0.06150	268.88
County Sales Tax @ 0.01225	53.56
City Sales Tax @ 0.01500	65.58

CURRENT CHARGES

4760.04

260 52x100 950

TOTAL AMOUNT DUE 38690.73

MAP 52x100

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com

Exhibit A-6

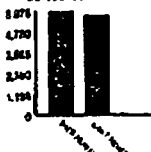


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001000401987

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	6/26/14	7/25/14	45900	51874
	Read Difference			5974.00
	Actual Usage in CCF			5974.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

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Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,700) are eligible for grants under the Atmos Energy "Share the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-566-2769, Ext. 403.

BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 38690.73

CURRENT GAS CHARGE TOTAL 4501.28
COMMERCIAL

Facility Charge	37.75
COM Commodity Cost @ 0.137/CCF	818.44
PGA @ 0.50925/CCF	3042.26
WNA Factor @ 0.00550000-/CCF	32.86
Franchise Fee @ 0.052632	225.07
Gas Hedge Factor @ 0.06133/CCF	366.39
AD Valorem Surcharge @ 0.00696/CCF	41.58
GSRG Surcharge	2.65

TAX/FEE CHARGE TOTAL 399.49

State Sales Tax @ 0.06150	276.83
County Sales Tax @ 0.01225	55.14
City Sales Tax @ 0.01500	67.52

CURRENT CHARGES

4900.77

260 53400-950

TOTAL AMOUNT DUE 43591.50

MAP 52606

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

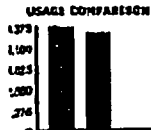
atmosenergy.com



Emergency Telephone
24/7
1-866-322-8667

Customer Service
M-F 7am-8pm Sat 8am-5pm (Central)
1-888-286-6700
atmosenergy.com

001006401988



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	7/26/14	8/26/14	51874	58246
	Read Difference		6372.00	
	Actual Usage In CCF		6372.00	

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

Atmos Energy encourages customers who are having difficulty paying their energy bills to apply today for energy assistance funds. A local energy-assistance agency can help determine if you qualify and then can help you sign up.

Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,700) are eligible for grants under the Atmos Energy "Share the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-568-2769, Ext. 403.

BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 43591.50

CURRENT GAS CHARGE TOTAL 4742.11
COMMERCIAL

Facility Charge	37.75
COM Commodity Cost @ 0.137/CCF	872.96
PGA @ 0.50652/CCF	3227.55
WNA Factor @ 0.01115000-/CCF	71.05
Franchise Fee @ 0.052632	237.11
Gas Hedge Factor @ 0.06133/CCF	390.79
AD Valorem Surcharge @ 0.00696/CCF	44.35
GSRS Surcharge	2.65

TAX/FEE CHARGE TOTAL 420.86

State Sales Tax @ 0.06150	291.64
County Sales Tax @ 0.01225	58.09
City Sales Tax @ 0.01500	71.13

CURRENT CHARGES

5162.97

2600.53400.950

TOTAL AMOUNT DUE 48754.47

MAP 52601

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com

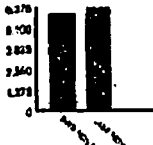


Emergency Telephone
24/7
1-866-322-8667

Customer Service
M-F 7am-8pm Sat 8am-5pm (Central)
1-888-286-6700
atmosenergy.com

001000401991

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	8/27/14	9/25/14	58246	64220
Read Difference				5974.00
Actual Usage in CCF				5974.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

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BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 48754.47
CURRENT GAS CHARGE TOTAL 4698.01
COMMERCIAL

Facility Charge	39.53
COM Commodity Cost @ 0.137/CCF	115.63
COM Commodity Cost @ 0.1486/CCF	762.32
PGA @ 0.53637/CCF	3204.27
WNA Factor @ 0.01115000-/CCF	66.61
Franchise Fee @ 0.052632	234.90
Gas Hedge Factor @ 0.06133/CCF	366.39
AD Valorem Surcharge @ 0.00696/CCF	41.58

TAX/FEE CHARGE TOTAL 416.95

State Sales Tax @ 0.06150	288.93
County Sales Tax @ 0.01225	57.55
City Sales Tax @ 0.01500	70.47

CURRENT CHARGES

260.33400 950

5114.96

TOTAL AMOUNT DUE 53869.43

MAP 52608

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com

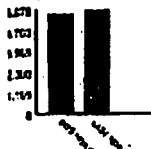


Emergency Telephone
24/7
1-866-322-8607

Customer Service
M-F 7am-8pm Sat 8am-5pm (Central)
1-888-286-6700
atmosenergy.com

001000401993

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	9/26/14	10/24/14	64220	69995
	Read Difference			5775.00
	Actual Usage in CCF			5775.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

Atmos Energy encourages customers who are having difficulty paying their energy bills to apply today for energy assistance funds. A local energy-assistance agency can help determine if you qualify and then can help you sign up.

Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,700) are eligible for grants under the Atmos Energy "Share the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-566-2769, Ext. 403.

BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 53869.43

CURRENT GAS CHARGE TOTAL 4554.29
COMMERCIAL

Facility Charge	40.88
COM Commodity Cost @ 0.1486/CCF	858.17
PGA @ 0.53637/CCF	3097.54
WNA Factor @ 0.01115000-/CCF	64.39
Franchise Fee @ 0.052632	227.72
Gas Hedge Factor @ 0.06133/CCF	354.18
AD Valorem Surcharge @ 0.00696/CCF	40.19

TAX/FEE CHARGE TOTAL 404.19

State Sales Tax @ 0.06150	280.09
County Sales Tax @ 0.01225	55.79
City Sales Tax @ 0.01500	68.31

CURRENT CHARGES 4958.48

260-53400 950

TOTAL AMOUNT DUE 58827.91

MAP 57409

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com

Exhibit A-10



Emergency Telephone
24/7
1-866-322-8667

Customer Service
M-F 7am-8pm Sat 8am-5pm (Central)
1-888-286-6700
atmosenergy.com

001000401995

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	10/25/14	11/21/14	69995	75571
Read Difference				5576.00
Actual Usage In CCF				5576.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

Almos Energy encourages customers who are having difficulty paying their energy bills to apply today for energy assistance funds. A local energy-assistance agency can help determine if you qualify and then can help you sign up.

Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,700) are eligible for grants under the Atmos Energy "Share the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-586-2769, Ext. 403.

BEWARE OF CARBON MONOXIDE

Carbon monoxide (CO) is a potentially deadly gas produced by improperly working appliances. Have your heating equipment checked regularly for safety and efficiency. Also, install approved CO detectors in sleeping areas.

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com

Customer Number: 4002813056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 58827.91

CURRENT GAS CHARGE TOTAL 3903.26
COMMERCIAL

Facility Charge	40.88
COM Commodity Cost @ 0.1486/CCF	828.59
PGA @ 0.51327/CCF	2861.99
WNA Factor @ 0.01115000-/CCF	62.17
Franchise Fee @ 0.052632	195.16
AD Valorem Surcharge @ 0.00696/CCF	38.81

TAX/FEE CHARGE TOTAL 346.41

State Sales Tax @ 0.06150	240.05
County Sales Tax @ 0.01225	47.81
City Sales Tax @ 0.01500	58.55

CURRENT CHARGES

2400 53400.950 4249.67

TOTAL AMOUNT DUE 63077.58

MAP 52610

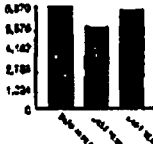


Emergency Telephone
24/7
1-866-322-8667

Customer Service
M-F 7am-8pm Sat 8am-5pm (Central)
1-888-286-6700
atmosenergy.com

001000402005

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	11/22/14	12/26/14	75571	82541
	Read Difference			6970.00
	Actual Usage in CCF			6970.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

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BEWARE OF CARBON MONOXIDE

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Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 01/19/15
PAST DUE AFTER 02/03/15

BILLING INFORMATION:

PREVIOUS BALANCE 63077.58
CURRENT GAS CHARGE TOTAL 4933.61
COMMERCIAL
Facility Charge 40.88
COM Commodity Cost @ 0.1486/CCF 1035.74
PGA @ 0.52217/CCF 3639.52
WNA Factor @ 0.01115000-/CCF 77.72-
Franchise Fee @ 0.052632 246.68
AD Valorem Surcharge @ 0.00696/CCF 48.51
TAX/FEE CHARGE TOTAL 437.86
State Sales Tax @ 0.06150 303.42
County Sales Tax @ 0.01225 60.44
City Sales Tax @ 0.01500 74.00
CURRENT CHARGES 5371.47
TOTAL AMOUNT DUE 68449.05

MAP 52611

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com



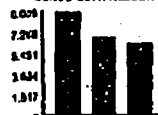
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Emergency Telephone
24/7
1-866-322-8667

Customer Service
M-F 7am-8pm Sat 8am-5pm (Central)
1-888-286-6700
atmosenergy.com

007301324811

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	12/27/14	1/29/15	82541	91625
	Read Difference		9084.00	
	Actual Usage in CCF		9084.00	

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

SURCHARGE EXPLANATION:

The Gas System Reliability Surcharge (GSRs) is a surcharge to recover the costs of utility plant projects that have been completed since the last rate case pursuant to K.S.A. 66-2001 through 66-2204, and includes a small "true-up" amount from a prior filing. This is a monthly fixed amount per meter for each customer within each respective customer classification and will appear on your bill until this surcharge is rolled into regular rates following the next rate case settlement.

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BEWARE OF CARBON MONOXIDE

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IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 02/02/15
PAST DUE AFTER 02/17/15

BILLING INFORMATION:

PREVIOUS BALANCE 68449.05
Payment Received 02/01/2015 68449.05-

CURRENT GAS CHARGE TOTAL 6303.72
COMMERCIAL

Facility Charge 40.88
COM Commodity Cost @ 0.1486/CCF 1349.88
PGA @ 0.51033/CCF 4635.84
WNA Factor @ 0.01115000-/CCF 101.29-
Franchise Fee @ 0.052632 315.19
AD Valorem Surcharge @ 0.00696/CCF 63.22

TAX/FEE CHARGE TOTAL 559.46

State Sales Tax @ 0.06150 387.68
County Sales Tax @ 0.01225 77.22
City Sales Tax @ 0.01500 94.56

CURRENT CHARGES 6863.18

TOTAL AMOUNT DUE 6863.18

MAP-52839 January
MAP 52822 Remove - needs
260-53400-450 to go in Jan

Exhibit B



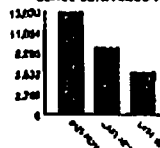
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Emergency Telephone
24/7
1-866-322-8667

Customer Service
M-F 7am-8pm Sat 8am-5pm (Central)
1-888-286-6700
atmosenergy.com

001000435943

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	1/30/15	2/24/15	91625	105454
	Read Difference			13829.00
	Actual Usage in CCF			13829.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

SURCHARGE EXPLANATION

The Gas System Reliability Surcharge (GSRS) is a surcharge to recover the costs of utility plant projects that have been completed since the last rate case pursuant to K.S.A. 66-2001 through 66-2204, and includes a small "true-up" amount from a prior filing. This is a monthly fixed amount per meter for each customer within each respective customer classification and will appear on your bill until this surcharge is rolled into regular rates following the next rate case settlement.

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

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Customers with an income not exceeding 200 percent of the Federal Poverty Guidelines (for example, a family of four with income less than \$47,100) are eligible for grants under the Atmos Energy "Sharing the Warmth" energy-assistance program administered by The Salvation Army. For a grant application, please call The Salvation Army at 1-877-566-2769, Ext. 403.

IF YOU SMELL GAS

If you smell a "rotten egg" odor or suspect a gas leak, don't wait! Leave the area and call 1-866-322-8667 or 911.

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 03/06/15
PAST DUE AFTER 03/23/15

Exhibit C-1

BILLING INFORMATION:

PREVIOUS BALANCE 6863.18
Payment Received 02/17/2015 6863.18-

CURRENT GAS CHARGE TOTAL 8855.46
COMMERCIAL

Facility Charge 40.88
COM Commodity Cost @ 0.1486/CCF 2054.99
PGA @ 0.46739/CCF 6463.54
WNA Factor @ 0.01115000-/CCF 154.19-
Franchise Fee @ 0.052632 442.78
AD Valorem Surcharge @ 0.0005/CCF 6.91
GSRS Surcharge 0.55

TAX/FEE CHARGE TOTAL 785.92

State Sales Tax @ 0.06150 544.61
County Sales Tax @ 0.01225 108.48
City Sales Tax @ 0.01500 132.83

OTHER CHARGE TOTAL 0.03-

Deposit Interest Applied 2/28/15 0.03-

CURRENT CHARGES 9641.35

TOTAL AMOUNT DUE 9641.35

MAP 53221
240-53400-950

IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com



10388

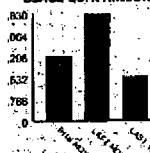
energy put in April?

Emergency Telephone
24/7
1-866-322-8667

Customer Service
M-F 7am-8pm Sat 8am-5pm (Central)
1-866-286-6700
atmosenergy.com

008701433147

USAGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	2/25/15	3/26/15	105454	113881
	Read Difference			8427.00
	Actual Usage in CCF			8427.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

ENTER TO WIN A \$2,000 YARD MAKEOVER!

Before you dig into your next outdoor project, enter the Yard Rescue 811 photo contest. Snap a photo of your yard for a chance to win a \$2,000 yard makeover. Go to www.atmosenergy.com or our Facebook page for contest rules and to upload your photo. Always remember to call 811 to have utility-owned lines marked before you start digging.

SURCHARGE EXPLANATION

The Gas System Reliability Surcharge (GSRS) is a surcharge to recover the costs of utility plant projects that have been completed since the last rate case pursuant to K.S.A. 66-2001 through 66-2204, and includes a small "true-up" amount from a prior filing. This is a monthly fixed amount per meter for each customer within each respective customer classification and will appear on your bill until this surcharge is rolled into regular rates following the next rate case settlement.

ARE YOU UNABLE TO PAY YOUR ENERGY BILLS?

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IF BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR ON YOUR NEXT BILL

atmosenergy.com

Customer Number: 4002613056 Exhibit C-2
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 03/27/15
PAST DUE AFTER 04/13/15

BILLING INFORMATION:

PREVIOUS BALANCE 9641.35
Payment Received 03/18/2015 9641.35-

CURRENT GAS CHARGE TOTAL 5296.56
COMMERCIAL

Facility Charge	40.88
COM Commodity Cost @ 0.1486/CCF	1252.25
PGA @ 0.45423/CCF	3827.80
WNA Factor @ 0.01115000-/CCF	93.96-
Franchise Fee @ 0.052632	264.83
AD Valorem Surcharge @ 0.0005/CCF	4.21
GSRS Surcharge	0.55

TAX/FEE CHARGE TOTAL 470.07

State Sales Tax @ 0.06150	325.74
County Sales Tax @ 0.01225	64.88
City Sales Tax @ 0.01500	79.45

CURRENT CHARGES 5766.63

TOTAL AMOUNT DUE 5766.63

MAP 53562
260-53400-950



Emergency Telephone
24/7
1-866-322-8667

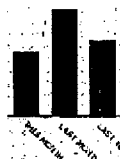
Customer Service
M-F 7am-6pm (Central)
1-888-286-6700
atmosenergy.com

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 05/12/15
PAST DUE AFTER 05/27/15

Exhibit D

009801505399

AGE COMPARISON



COMMERCIAL

Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	3/27/15	4/27/15	113881	118921
Read Difference				5040.00
Estimated Usage in CCF				5040.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

BE CAREFUL AROUND PIPELINE RIGHTS OF WAY

Yellow warning markers indicate the approximate route of larger pipelines and how to contact the operator. The right of way for a pipeline must always be kept clear so the line can be visually inspected and quickly repaired. Obstructions—such as buildings, cars and debris—must be kept off the right of way. State law requires you call 811 at least two working days before digging to have pipelines or other utilities marked.

CALL US IMMEDIATELY IF YOU SMELL GAS

If you smell a "rotten egg" odor or suspect a gas leak, don't wait! Leave the area immediately and call our emergency service number at 1-866-322-8667 or call 911.

REAT DEALS ON HOME SERVICES

Save up to 30 percent on internet, TV, telephone and other utility providers through our Connection Center. For more information, visit www.atmosenergy.com/move.

BILLING INFORMATION:

PREVIOUS BALANCE 5766.63
Payment Received 04/13/2015 5766.63-

CURRENT GAS CHARGE TOTAL 3432.23
COMMERCIAL

Facility Charge	40.88
COM Commodity Cost @ 0.1486/CCF	748.94
PGA @ 0.46017/CCF	2319.26
WNA Factor @ 0.01115000-/CCF	56.20-
Franchise Fee @ 0.052632	171.61
Gas Hedge Factor @ 0.04061/CCF	204.67
AD Valorem Surcharge @ 0.0005/CCF	2.52
GSRS Surcharge	0.55

TAX/FEE CHARGE TOTAL 304.60

State Sales Tax @ 0.06150	211.08
County Sales Tax @ 0.01225	42.04
City Sales Tax @ 0.01500	51.48

CURRENT CHARGES 3736.83

TOTAL AMOUNT DUE 3736.83

MAP 54177
260-53400-950

BILL IS NOT PAID BY DUE DATE A PENALTY (IF APPLICABLE) WILL APPEAR
ON YOUR NEXT BILL

atmosenergy.com



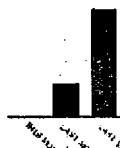
Emergency Telephone
24/7
1-866-322-8667

Customer Service
M-F 7am-6pm (Central)
1-888-286-6700
atmosenergy.com

002701513218

COMMERCIAL

AGE COMPARISON



Meter Serial #	Date of Service		Meter Reading	
	From	To	Previous	Present
1017345	3/27/15	4/27/15	113881	115353
1017345	4/28/15	5/26/15	115353	117148
1017345	5/27/15	6/24/15	117148	117156
Read Difference				3275.00
Estimated Usage in CCF				3275.00

IMPORTANT MESSAGES FROM YOUR NATURAL GAS COMPANY:

LOWER YOUR WINTER GAS BILLS WITH BUDGET BILLING

Enroll in budget billing now to better manage your heating bills this winter. Avoid the highs and lows in your natural gas bills as the weather changes. Budget billing works year-round, continually adjusting for how much you use and for changes in the cost of natural gas.

For residential customers only. Qualifications apply. To enroll, log in to your Account Center at www.atmosenergy.com or call 1-888-286-6700.

BE CAREFUL AROUND PIPELINE RIGHTS OF WAY

Yellow warning markers indicate the approximate route of larger pipelines and how to contact the operator. The right of way for a pipeline must always be kept clear so the line can be visually inspected and quickly repaired. Obstructions—such as buildings, cars and debris—must be kept off the right of way. State law requires you call 811 at least two working days before digging to have pipelines or other utilities marked.

YOU SMELL GAS

If you smell a 'rotten egg' odor or suspect a gas leak, don't wait! Leave the area immediately from a safe distance, call 911 or our emergency service number anytime at 866-322-8667.

YOUR ACCOUNT SHOWS A CREDIT BALANCE

atmosenergy.com



Customer Number: 4002613056



To update your mailing address or donate to energy assistance check here and complete the form on the back.

BKMAIL:ATMOS.20150530_23.afp

DH PACE CO
1901 E 119TH ST
OLATHE KS 66061-9502



68

Customer Number: 4002613056
Customer Name: DH PACE CO
Service Address: 1901 E 119TH ST
OLATHE KS 66061-9502
Billing Date: 06/30/15
Credit Balance: \$1,251.54

Exhibit E

BILLING INFORMATION:

PREVIOUS BALANCE 3736.83
Payment Received 05/27/2015 3736.83-

CURRENT GAS CHARGE TOTAL 2282.70
COMMERCIAL - 3/27/15 to 4/27/15

Facility Charge	40.88
COM Commodity Cost @ 0.1486/CCF	218.74
PGA @ 0.46017/CCF	677.37
WNA Factor @ 0.01115000-/CCF	16.41-
Franchise Fee @ 0.052632	51.67
Gas Hedge Factor @ 0.04061/CCF	59.78
AD Valorem Surcharge @ 0.0005/CCF	0.74
GSRS Surcharge	0.55

COMMERCIAL - 4/28/15 to 5/26/15

Facility Charge	40.88
COM Commodity Cost @ 0.1486/CCF	266.74
PGA @ 0.43383/CCF	778.72
WNA Factor @ 0.01115000-/CCF	20.01-
Franchise Fee @ 0.052632	60.04
Gas Hedge Factor @ 0.04061/CCF	72.89
AD Valorem Surcharge @ 0.0005/CCF	0.90
GSRS Surcharge	0.55

COMMERCIAL - 5/27/15 to 6/24/15

Facility Charge	40.88
COM Commodity Cost @ 0.1486/CCF	1.19
PGA @ 0.42382/CCF	3.39
WNA Factor @ 0.01115000-/CCF	0.09-
Franchise Fee @ 0.052632	2.43
Gas Hedge Factor @ 0.04061/CCF	0.32
GSRS Surcharge	0.55

TAX/FEE CHARGE TOTAL 202.59

State Sales Tax @ 0.06150	140.39
County Sales Tax @ 0.01225	27.96
City Sales Tax @ 0.01500	34.24

OTHER CHARGE TOTAL 3736.83-

Cancel Bill (-) 6/30/15 3736.83-

PRIOR AMOUNT DUE TOTAL AMOUNT DUE

0.00 0.00

Bill is due upon receipt. If current bill is not paid by the past due after date, a penalty (if applicable) will appear on your next bill. Prior amounts already past due may result in disconnection.

Amount Enclosed: \$

ATMOS ENERGY
PO Box 790311
St Louis, MO 63179-0311



Please return this portion with your payment. Include your customer number on your check or money order. If paying in person, please bring this bill. Thank you.

*** Account has Credit Balance ***



Leah Mullen <leah@energymes.com>

DH Pace - Re-billing Error

2 messages

Vlad Kaufman <vlad@energymes.com>

Sun, Apr 26, 2015 at 9:39 AM

To: "Jones, Kevin D" <kevin.jones@atmosenergy.com>

Cc: Leah Mullen <leah@energymes.com>

Kevin,

Great meeting with you on Thursday. Did you have a chance to see if the telemetry equipment on site? Did you get Xpdex last meter read?

In looking at this a few different ways, there is definitely an error. Could you help me correct it?

- **Atmos Revised Billing:** 72,684 CCF over 12 months from 12/27/13 to 12/26/14
- **Sq Ft Estimate:** Based off modern EMS system, .020 MCF/sf for 65,000 sf office, .022 MCF/sf for 160,000 sf of warehouse, would use 48,200 CCF/year.
- **Xpedx Usage:** Talked with XPedix and previous gas marketer - when transporting from last winter, used 11,061 CCF (Jan'13) and 10,037 CCF (Feb'13) and 1,002 CCF (Mar'13). With that kind of winter curve, I'd estimate around 40,000 ccf/year.
- **DH Pace 2015 Actuals:** Actual Atmos bills were 9,080 CCF in Jan'15 and 10,545 CCF in Feb'15. Estimating around 35,000 ccf/year

I'd guess their billing should have been in the 35,000-48,000 ccf range, while they were billed for 72,684 ccf.

Vlad Kaufman*President - Managed Energy Systems*

913-449-0000 (cell)

<http://www.energymes.com/>

Jones, Kevin D <Kevin.Jones@atmosenergy.com>

Mon, Apr 27, 2015 at 10:55 AM

To: Vlad Kaufman <vlad@energymes.com>

Cc: Leah Mullen <leah@energymes.com>, "Palmer, Bruce E" <Bruce.Palmer@atmosenergy.com>

Vlad,

We did confirm that the telemetry was still in place and the phone line is connected. I am not sure if it is operational. We also confirmed that the meter read 1095 on 11/12/13 and then read 82541 on 12/26/14. These are the dates and reads we were asked to get and prorated the billing for 81,446 CCF per the days of service. We took a reading when we were on site April 23rd of 116344 and their last reading on March 26th was 113881. So they have used 2,463 CCF in about a month. This is a direct read meter so it is very difficult not to get the correct reading. On our visit to the facility last week we did notice that several of the large overhead doors were open and my guess is that during the move in these doors could have been opened during some cold times increasing consumption. I did look at the volume usage for Xpedex for 2013 and they

- used 53,730 CCF. There are concerns with strictly estimating based on square footage since every business use is different. I would be open to discussing this further if you still have questions or concerns.

Thanks

Kevin

Exhibit F

**Estimated Back - Billing
By Atmos (2014)**

Service Dates	CCF Usage	Total \$	Atmos Rate
12/27/2013 - 1/27/2014	6,372	\$ 4,938.81	0.53034
1/28/2014 - 2/25/2014	5,775	\$ 4,621.64	0.55284
2/26/2014 - 3/26/2014	5,775	\$ 5,875.77	0.74233
3/27/2014 - 4/25/2014	5,974	\$ 6,169.21	0.69452
4/26/2014 - 5/27/2014	6,372	\$ 5,690.58	0.57312
5/28/2014 - 6/25/2014	5,775	\$ 4,760.04	0.51242
6/26/2014 - 7/25/2014	5,974	\$ 4,900.77	0.50925
7/26/2014 - 8/26/2014	6,372	\$ 5,162.97	0.50652
8/27/2014 - 9/25/2014	5,974	\$ 5,114.96	0.53637
9/26/2014 - 10/24/2014	5,775	\$ 4,958.48	0.53637
10/25/2014 - 11/21/2014	5,576	\$ 4,249.67	0.51327
11/22/2014 - 12/26/2014	6,970	\$ 5,371.47	0.52217

72,684 \$ 61,814.37

Previous Balance?!? \$ 6,634.69

Total Paid by DH Pace \$ 68,449.06

8-5 Operation

Office	
0.020	MCF/sf
65,000	sf
1,300	Total MCF

Warehouse	
0.022	MCF/sf
160,000	sf
3,520	Total MCF

4,820 Total MCF

48,200 Total CCF

Difference in CCF 24,484

Difference in \$ \$ 33,969.81

**Projected Billing
(Sq. Ft. Estimate)**

Service Dates	% Usage	CCF Usage	Total \$	Atmos Rate	COG
12/27/2013 - 1/27/2014	20.0%	4,000	\$ 3,100.32	0.53034	\$ 0.78
1/28/2014 - 2/25/2014	20.0%	4,000	\$ 3,201.14	0.55284	\$ 0.80
2/26/2014 - 3/26/2014	12.0%	2,000	\$ 2,034.90	0.74233	\$ 1.02
3/27/2014 - 4/25/2014	9.0%	4,338	\$ 4,479.75	0.69452	\$ 1.03
4/26/2014 - 5/27/2014	6.0%	2,892	\$ 2,582.73	0.57312	\$ 0.89
5/28/2014 - 6/25/2014	0.5%	241	\$ 198.64	0.51242	\$ 0.82
6/26/2014 - 7/25/2014	0.5%	241	\$ 197.70	0.50925	\$ 0.82
7/26/2014 - 8/26/2014	0.5%	241	\$ 195.27	0.50652	\$ 0.81
8/27/2014 - 9/25/2014	0.5%	241	\$ 206.35	0.53637	\$ 0.86
9/26/2014 - 10/24/2014	4.0%	1,928	\$ 1,655.40	0.53637	\$ 0.86
10/25/2014 - 11/21/2014	9.0%	4,338	\$ 3,306.15	0.51327	\$ 0.76
11/22/2014 - 12/26/2014	18.0%	8,676	\$ 6,686.21	0.52217	\$ 0.77
	100%	48,200	\$ 27,844.56		

ACTUAL Billing (2015)

Service Dates	CCF Usage	Total \$	Atmos Rate
12/27/2014 - 1/29/2015	9,084	\$ 6,863.18	0.51033
1/30/2015 - 2/24/2015	13,829	\$ 9,641.35	0.46739
2/25/15-3/26/2015	8,427	\$ 5,766.63	0.45423

31,340

Estimated Billing (2015)

Service Dates	CCF Usage	Total \$	Atmos Rate
3/26/2015-4/27/2015	5,040	\$ 3,736.83	0.46017
3/27/2015-4/27/2015	1,472	\$ 1,033.32	0.46017
4/28/2015-5/26/2015	1,795	\$ 1,200.71	0.43383
5/27/2015-6/24/2015	8	\$ 48.67	0.42382

Bill Cancelled See Exhibit E

**Previous Tenant Usage
ACTUAL (2013)**

Service Dates	CCF Usage
January 1, 2013	12,880
February 1, 2013	10,720
March 1, 2013	5,630
April 1, 2013	2,440
May 1, 2013	450
June 1, 2013	20
July 1, 2013	130

32,270

*We were not able to get a full 12 months of usage

DH Pace - Atmos

PGA Differences

ESTIMATED BILLS 2014 & 2015

Service Dates	CCF Usage	Jan 2015 PGA	PGA	Hedge	Not Following Tariffs	Following Tariffs
					Total	Total Jan 2015 PGA
Previous Balance - Bill Never Received					\$ 6,634.69	
12/27/2013 - 1/27/2014 -Jan	6,372	0.51033	\$0.5303		\$ 3,379.33	\$3,251.82
1/28/2014 - 2/25/2014 -Feb	5,775	0.51033	\$0.5228		\$ 3,019.40	\$2,947.16
2/26/2014 - 3/26/2014 - March	5,775	0.51033	\$0.7423		\$ 4,286.96	\$2,947.16
3/27/2014 - 4/25/2014 - April	5,974	0.51033	\$0.6945	\$0.0613	\$ 4,515.45	\$3,048.71
4/26/2014 - 5/27/2014 - May	6,372	0.51033	\$0.5731	\$0.0613	\$ 4,042.72	\$3,251.82
5/28/2014 - 6/25/2014 - June	5,775	0.51033	\$0.5124	\$0.0613	\$ 3,313.23	\$2,947.16
6/26/2014 - 7/25/2014 - July	5,974	0.51033	\$0.5093	\$0.0613	\$ 3,408.47	\$3,048.71
7/26/2014 - 8/26/2014 - August	6,372	0.51033	\$0.5065	\$0.0613	\$ 3,618.15	\$3,251.82
8/27/2014 - 9/25/2014 - Sept.	5,974	0.51033	\$0.5364	\$0.0613	\$ 3,570.48	\$3,048.71
9/26/2014 - 10/24/2014 - Oct.	5,775	0.51033	\$0.5364	\$0.0613	\$ 3,451.72	\$2,947.16
10/25/2014 - 11/21/2014 - Nov.	5,576	0.51033	\$0.5364		\$ 2,990.80	\$2,845.60
11/22/2014 - 12/26/2014 Dec.	6,970	0.51033	\$0.5133		\$ 3,577.49	\$3,557.00
Estimated Bills (2015)		June 2015 PGA				
3/27/2015-4/27/2015	1472	0.42382	\$0.4602	\$0.0406	\$ 677.37	\$623.86
4/28/2015-5/26/2015	1795	0.42382	\$0.4338	\$0.0406	\$ 778.72	\$760.76
5/27/2015-6/24/2015	8	0.42382	\$0.4238	\$0.0406	\$ 3.39	\$3.39

Totals: \$ 51,268.36 \$38,480.84

Atmos Tariff Section 4.G.8 – Purchase gas cost adjustments covering more than a one month period shall be based on the most recent adjustment clause calculation filed with the commission.

Difference \$ 12,787.52

Exhibit H

1500 SW Arrowhead Road
Topeka, KS 66604-4027

Shari Feist Albrecht, Chair
Jay Scott Emler, Commissioner
Pat Apple, Commissioner



Exhibit I

Phone: 785-271-3100
Fax: 785-271-3354
<http://kcc.ks.gov/>

Sam Brownback, Governor

July 8, 2015

Ms. Leah Mullin
6600 College Blvd. Suite 125
Overland Park, KS 66211

Dear Ms. Mullin:

I apologize for not getting back with you sooner, but the Atmos manager that I have been dealing with has been out of the office. Upon his return he sent me screen shots of the Atmos billing system that show the beginning and ending readings for the meter that serves the DH Pace company. Copies of the screen shots are enclosed.

According to Atmos, the meter at this location is a roots 2M, and was set on 6/15/2010 when it read 000000. It apparently had recently "rolled over." The company believes that the meter readings are correct and it has billed for actual, not estimated usage.

If you are not satisfied with the response from Atmos, I have also enclosed a formal complaint form. If you wish to file a formal complaint it must include a statement from DH Pace that gives you permission to act on its behalf.

Cordially,

Steve Boyd
Program Consultant



Public Affairs and Consumer Protection
Kansas Corporation Commission
1500 SW Arrowhead Road | Topeka, KS | 66604-4027
Phone (785) 271-3242 | Fax (785) 271-3111 | <http://kcc.ks.gov/>

http://cmrprod.atmosenergy.com sap-b01ib2p1 Applications | M... Interaction C... Interaction Cent... Update Delete re... Location Maps ... Citrix XenApp - ...

SAP CRM Interaction Center Personalize Help Center System News Log Off

DH PACE CO / 4002613056 Has an open BPEN case on Business Partner or Contract Ac
1001 E 119TH ST . OLATHE, KS 66061-8502
End Ready

Saved Searches Back

Launch Transaction

Display Transaction text: Operation 0010 Language EN

Menu Back Cancel Exit Systems Select Text Symbol Definition

1 2 3 4 5 6 7

- DEAD MTR, VFY MTR INFO.
- LAST READ @ MVN IN NOV 2014. PLS CHECK MTR, AND NOTE ALL INFO INCLUDING READ THANKS
- DOGS
- FEE WAIVE: NO
- TECH COMPLETION NOTES:
- # davis 1 13 15 086127 reading is 086127 meter is on 08 - Reading: 06
- 6127; Meter Serial Number: 086127; Meter Manufacture: DR; Meter Model: 2
- M; ALZAMR Serial Number: ; ALZAMR Manufacture: "" #

SYSTEM Lines 1 - 9 / 9

PE1 ds00puapp471

10:22 AM 10/20/2015

SAP CRM Interaction Center

Personalize Help Center System News Log Off

<http://singerad.abnester.org.com>
[SAP](#)
[Applications](#)
[Interaction C.](#)
[Interaction C.](#)
[Interaction C.](#)
[Interaction C.](#)
[Report > St...](#)
[Location Ma...](#)
[Cont. Xmp...](#)

[End](#)
[Send Searches](#)
[Help](#)
[Back](#)

Launch Transaction

Display Transaction text: Operation 0010, Language EN

[Menu](#)
[Back](#)
[Cancel](#)
[End](#)
[System](#)
[Select Tool](#)
[Symbol Definition](#)

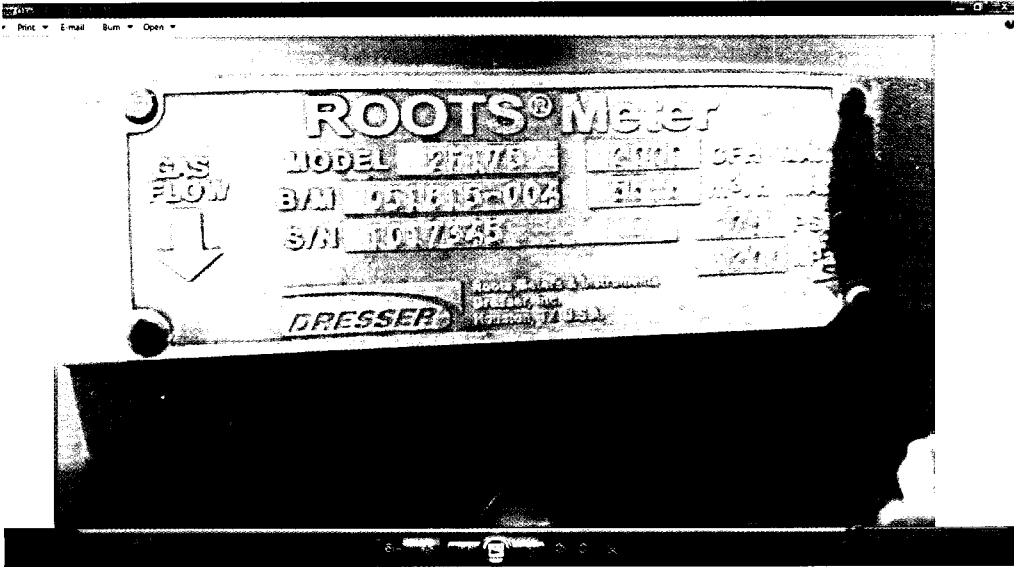
- Identification
- BP Overview
- Summary
- Service order List
- Interaction Record
- Payment List
- BP Balance Overview
- Billing
- Outgoing History
- Master Reading
- Ad Hoc Correspondence
- Display Case List
- Resources

- FEE WAIVE: NO
- TECH COMPLETION NOTES:
- // Reads 001695, 11/12/13 - C. Beads B

SYSTEM ----- Lines 1 - 3 / 3 -----

PR1:11, 0000000001

[SAP](#)
[Applications](#)
[Interaction C.](#)
[Interaction C.](#)
[Interaction C.](#)
[Interaction C.](#)
[Report > St...](#)
[Location Ma...](#)
[Cont. Xmp...](#)





Managed Energy Systems
Your Energy Advocate

6600 College Blvd. Suite 125
Overland Park, KS 66211

Phone: 913.333.3713
www.energymes.com

Formal Complaint
7/21/2015

Customer of Record: DH Pace

The following complaint is being submitted by Managed Energy Systems on behalf of DH Pace. Please see the attached letter of authorization to confirm.

Service Address:

1901 E 119th St., Olathe, KS 66085

Daytime Phone: 913-333-3713

Email: leah@energymes.com

Name of the Utility: Atmos Energy

Account #: 4002613056

Please see the attached documents for further information regarding this complaint.

Received
on

JUL 22 2015

by
State Corporation Commission
of Kansas

July 20, 2015


Managed Energy Systems
Leah Mullen, Director
6600 College Blvd, Suite 125
Overland Park, KS 66211

RE: DH Pace permission to Managed Energy Systems

Leah,

This letter serves to give permission to Managed Energy Systems to act on behalf of DH Pace Company, Inc., as it relates to the formal complaint submitted to the KS Corporation Commission against Atmos Energy.

Regards,



Chris Mann

Executive Vice President / CIO

DH Pace Company, Inc.

Direct: (816) 480-2613

Office: (816) 221-0543

Mobile: (816) 935-1245

Email: Chris.Mann@dhpac.com

Received
on

JUL 22 2015

by
State Corporation Commission
of Kansas

DH Pace Door Company, Inc.

1901 E. 119th Street • Olathe, KS 66061 • P 913-648-3667 • P 816-221-0072 • F 816-480-2625 • DHPace.com

ARIZONA • COLORADO • GEORGIA • ILLINOIS • KANSAS • MISSOURI • NEW MEXICO