BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

)

)

)

In the Matter of the Complaint Against Atmos Energy by DH Pace Company Located At: 1901 E. 119th Street, Olathe, Kansas 66061

Docket No. 16-ATMG-049-COM

ANSWER

Atmos Energy submits the following Answer to the Complaint filed by DH Pace Co. ("DH Pace").

FACTUAL BACKGROUND

Atmos Energy provides natural gas service to the commercial building located at 1901
E. 119th Street, Olathe, Kansas, 66061 ("1901").

2. Prior to October 18, 2013, the account relating to 1901 was in the name of International Paper Company ("IPC").

3. Atmos Energy provided transportation service to IPC at 1901 through September 2013.

4. According to Atmos Energy Service Order No. 10000815499, on October 18, 2013, DH Pace submitted to Atmos Energy a change in occupancy request to place the account at 1901 into its name. A copy of that Service Order is attached hereto as Exhibit D and is incorporated herein by reference.

5. On November 12, 2013, Atmos Energy's technician read the electronic meter at 1901. The technician recorded an actual reading of 1,095 ccf. A copy of the technician's notes dated November 12, 2013, showing the actual reading of 1,095 ccf is attached hereto as Exhibit A and is incorporated herein by reference.

6. Because IPC was taking transportation service at 1901, electronic flow measurement equipment was installed at 1901. This allowed the utility to remotely read actual usage at 1901.

Therefore, 1901 was not on a meter reading route. At the time DH Pace began taking sales service in October, 2013, 1901 was not assigned a meter reading route. No meter readings were taken and no bills issued to DH Pace between October 18, 2013 and January 18, 2015.

7. On December 17, 2014, DH Pace contacted Atmos Energy to ask why it had not received a bill from Atmos Energy for the past 13-month period (October 2013-December 2014).

8. Upon the inquiry by DH Pace, 1901 was assigned a meter reading route. On January 13, 2015, Atmos Energy read the electronic meter at 1901. The reading of actual usage measured by the electronic meter was 86,127 ccf. This meant that between November 12, 2013, and January 13, 2015, DH Pace used 85,032 ccf (86,127 ccf minus 1,095 ccf equals 85,032 ccf). DH Pace suggested in its Complaint that it was billed for an "estimate" of usage during the 13-month period. However, the 85, 032 ccf is not an estimate. Instead, it is the actual amount of usage as measured by the electronic meter during that period of time when DH Pace did not receive a bill from Atmos Energy.

9. On January 19, 2015, Atmos Energy submitted DH Pace bills for a portion of the 85,032 ccf of actual usage (81,446 ccf) for the period between November 12, 2013, and December 26, 2014). Atmos Energy prorated the 81,446 ccf equally over the 13-month period.¹ The total amount owed by DH Pace for actual usage between November 12, 2013 and December 26, 2014, was calculated by Atmos Energy to be \$68,449.05. Contrary to the allegations contained in the Complaint, Atmos Energy had several conversations with DH Pace explaining how the actual usage during the 13-month period had been prorated over that period of time in determining the bills issued by the utility.

¹Atmos Energy took the total days of service between November 12, 2013, and January 13, 205, divided that into the actual usage based upon the meter reading on November 12, 2013, and the meter reading on January 13, 2015, to arrive at a daily usage amount. It then multiplied the daily usage amount by the number of days in the billing period to obtain the monthly usage.

10. On February 1, 2015, Atmos Energy received payment from DH Pace in the amount of \$68,449.05.

11. Atmos Energy did use an estimated rather than actual usage in issuing its bill to DH Pace for April 2015.² Because the historical usage information for April 2014 was the prorated amounts that Atmos Energy had used to calculate the amount owed by DH Pace for that period when no bills were issued, the estimates used to calculate the bill for April 2014 exceeded the actual usage for April 2015. This has been corrected by Atmos Energy and DH Pace's account has been credited for the difference between the estimated usage and actual usage for April 2015.

REASON WHY DH PACE DID NOT RECEIVE BILL FOR SERVICE BETWEEN OCTOBER 18, 2013, AND DECEMBER 2014 AND ATMOS ENERGY'S CORRECTION OF THE BILLING ISSUE

12. Atmos Energy's billing control department determined that there were a number of factors that led to DH Pace not receiving a bill for service between October 18, 2013, when DH Pace notified Atmos Energy to change the name on the 1901 account from IPC to DH Pace, and December, 2014, when DH Pace notified Atmos Energy it had not received a bill from Atmos Energy for usage during that 13-month period. Those factors included:

(a) Atmos Energy changed its billing system in 2013.

(b) IPC was a transportation customer. DH Pace was a sales customer. This was the first time under the new billing system where an account location changed from a transportation account to a sales account. Instead of the billing system maintaining the account location and changing the name and type of service at the account location, it dropped

²It is likely the billing system compared the actual usage in April 2015 to the prorated usage calculated by Atmos Energy for April 2014 and because the prorated usage was different from the April 2015 actual usage, the billing system used an estimate rather than the actual usage to generate the bill.

the account.

(c) IPC's electronic meter at 1901 was read remotely, and therefore, 1901 (the physical location) was not included on any meter reading route and therefore the meter was not read during the 13-month period.

13. Atmos Energy's billing control department has created a process to correct the billing issue that arose with the 1901 account. Currently, when a transportation customer either ends service or switches to sales service, Atmos Energy's billing department creates an inter-department request for SAP related work. This process requests that the customer account be moved out of the transportation account and the billing control department changes the rate designation from transportation to commercial/industrial sales. Atmos Energy is also in the process of reviewing any inactive customer accounts which still have a transportation rate category in order to confirm that those accounts are either inactive or if active are being billed and billed under the proper rate.

ATMOS ENERGY'S DISCUSSIONS WITH DH PACE AND THE KCC STAFF

14. In April 2015, Atmos Energy met with Managed Energy Systems ("MES"), who was retained by DH Pace. Atmos Energy explained to MES that the electronic meter was in proper working condition and recorded actual usage between November 12, 2013, and January 13, 2015. Atmos Energy also explained how the usage was prorated during that 13-month period. Atmos Energy had the same discussion with the KCC Staff.

KANSAS LAW REQUIRES DH PACE TO PAY FOR ACTUAL USAGE

15. As set forth by the Kansas Supreme Court in *Kansas Electric Power Co. v. Thomas*, 123 Kan. 321, 325, 255 P.33 (1927) ("*Thomas Case*"), and the Commission's recognition of the holding in the *Thomas Case*, see, *In the Matter of the Complaint of Astor Universal Corporation* *Against Atmos Energy*, Docket No. 98-GRLG-102-COM, DH Pace is required under Kansas law to pay for it actual usage.

ATMOS ENERGY'S RESPONSE TO DH PACE'S COMPLAINT

16. Atmos Energy admits that DH Pace contacted Atmos Energy on October 18, 2013, to submit a change in occupancy request to move the account relating to service at 1901 into DH Pace's name. See Exhibit D attached to this Answer.

17. Atmos Energy admits that for the reasons stated above, Atmos Energy did not send DH Pace an invoice for natural gas used by DH Pace at 1901 between October 18, 2013 and the end of December, 2014. However, Atmos Energy's records show that it had a technician read the electronic meter at 1901 on November 12, 2013, and that technician recorded the meter reading on November 12, 2013, at 1,095 ccf. A copy of Atmos Energy's business record is attached to this Answer as Exhibit A. Atmos Energy also took a meter reading at 1901 on January 13, 2015. The meter read 86,127 ccf. This means that between November 12, 2013 and January 13, 2015, DH Pace's actual metered usage was 85,032 ccf.

18. Atmos Energy admits that in December 2014, DH Pace contacted Atmos Energy to let it know DH Pace had not received a bill for gas usage for the past 13-month period (October 2013-December 2014).

19. Atmos Energy admits that following DH Pace letting it know it had not received a bill for gas usage for the past 13-month period Atmos Energy determined DH Pace's actual usage during that period by using the meter reading that Atmos Energy's technician recorded on November 12, 2013, as shown in Exhibit A to this Answer, and the meter reading taken by Atmos Energy on January 13, 2015, as shown in Exhibit B to this Answer. As explained above, Atmos Energy billed DH Pace for its actual usage for that 13-month period by prorating the usage on an equal daily basis over that time period.

20. Atmos Energy admits that on January 19, 2015, it created 12 separate monthly bills that prorated the 13 month actual usage on an equal daily basis.

21. Atmos Energy denies that the bills it sent DH Pace on January 19, 2015, for its actual usage for the 13-month period in which DH Pace did not receive a bill, contained any errors. The \$6,634.69 balance in the bill that Atmos Energy created for the period 12/27/2013 to 1/27/2014, was for usage that was assigned to the period between November 12, 2013, and December 26, 2013. DH Pace was not charged for any usage it may have had at 1901 prior to the meter reading that took place on November 12, 2013.

22. Atmos Energy denies that it did not follow up with DH Pace to explain how it prorated DH Pace's actual usage over the 13-month period for billing purposes. Atmos Energy's representatives had several discussions with DH Pace regarding how the actual usage was prorated over the 13-month period for billing purposes.

23. Atmos Energy admits that DH Pace paid Atmos Energy, \$68,449.05, on February 1,2015.

24. Atmos Energy admits that DH Pace hired MES. Atmos Energy admits it has met with MES to discuss this matter.

25. Atmos Energy admits that DH Pace is a "winter user" and that DH Pace should not have substantial usage over the summer months. The equal daily proration method that Atmos Energy used to spread DH Pace's actual usage during the 13-month period in which DH Pace was not billed to determine the amount owed for that actual usage would have shifted some of DH Pace's usage to

the non-winter months (June 2014-August 2014) when the commodity portion of the bill ranged from 50 cents per ccf to 53 cents per ccf.

26. Atmos Energy admits that MES contacted Kevin Jones at Atmos Energy to set up a meeting to discuss the billing issue relating to DH Pace and that a meeting between MES and Mr. Jones occurred in April 2015. Mr. Jones explained that the bills were based upon the actual usage by DH Pace during the 13-month period as measured by the meter reading that was documented on November 12, 2013, and the meter reading that was documented on January 13, 2015. He explained how the actual usage was prorated. Atmos Energy does not have sufficient information to determine the truth of the expected calculated volumes prepared by MES that are set forth on page 2 of the Complaint and therefore denies the same. In response to this information, Atmos Energy's employees who visited 1901 in April 2015, noted that the commercial building has several large garage doors that were left open to the outside and not shut during the entire time of their visit. If these large garage doors were left open to the outside and not shut during business hours, then for those periods of time when the weather outside was cold, keeping the garage doors open would have significantly increased the amount of natural gas used by DH Pace for heating purposes and the expected volumes calculations included by MES at page 2 would not account for that fact and would have significantly underestimated the amount of gas used by DH Pace.

27. In addition, because the actual usage by DH Pace during the period between November 12, 2013, and January 13, 2015, was measured by a properly working meter, it was not necessary to use an estimated amount of usage in this matter.

28. Atmos Energy admits that Nancy Landers retired and is no longer with Atmos Energy. Atmos Energy denies that it does not have business records to substantiate DH Pace's actual usage during the 13 months in which it was not billed by Atmos Energy. Atmos Energy admits that it was not willing to revise DH Pace's bill for the 13-month period based upon MES' expected volumes calculation because it was not necessary to use an estimated amount of usage in this matter due to the existence of the meter readings that measured the actual amount of gas used during that 13-month period.

29. Atmos Energy denies the allegation made at page 3 of the Complaint that it did not follow its tariffs. The tariff provisions sited at page 3 of the Complaint relate to a situation where the customer's actual usage was not metered properly, for example, where a meter is not working and so the utility is required to estimate the customer's usage. In this case, the meter at 1901 worked properly. Atmos Energy had a recorded usage amount for November 12, 2013, and a recorded usage amount for January 13, 2015, which measured the actual amount of gas used by DH Pace over that 13-month period. Therefore, there was no reason to estimate consumption and no violation of the tariff sections set forth on page 3 of the Complaint.

30. Atmos Energy denies the allegations made at pages 3 and 4 of the Complaint that the proration method used by Atmos Energy to spread the customer's actual usage over the 13-month period on an equal daily basis violated any of Atmos Energy's tariffs relating to billing.

31. Atmos Energy admits that DH Pace's meter was not read in April 2015 and that an estimated bill was generated and sent to DH Pace based upon the usage amounts for that month generated by the proration method used by Atmos Energy to spread the customer's actual usage over the 13-month period. Atmos Energy denies that it violated any of its tariffs in issuing the estimated bill. Atmos Energy admits that it has provided DH Pace a credit for the difference between the estimated usage and actual usage for the month of April 2015.

32. Atmos Energy denies the allegation at page 5 of the Complaint that it did not provide confirmation through its business records that a technician read the meter at 1901 on November 12, 2013, and the meter read 1,095 ccf and that a technician read the meter at 1901 on January 13, 2015, and the meter read 86,127 ccf. Atmos Energy provided this information to the KCC Staff who was reviewing the informal complaint submitted by MES on behalf of DH Pace.

33. The following is Atmos Energy's response to the "Requested Information" items set forth at page 5 of the Complaint:

1. **Provide documentation that validates both the beginning** (November 2013) and end (December 2014) meter reads. <u>Response</u>: Attached to this Answer as Exhibit A, and incorporated herein by reference, is a copy of Atmos Energy's business record showing that on November 12, 2013, an Atmos Energy technician read the meter at 1901 and recorded the meter reading of 1,095 ccf. Attached to this Answer as Exhibit B, and incorporated herein by reference, is a copy of Atmos Energy's business record showing that on January 13, 2015, an Atmos Energy technician read the meter at 1901 and recorded the meter reading of 86,127 ccf.

2. **Provide documentation that shows the final meter read for the previous tenant.** <u>Response</u>: Attached to this Answer as Exhibit C, and incorporated herein by reference, is a copy of Atmos Energy's business record showing that IPC was last billed on September 30, 2013, and that on October 1, 2013, the electronic meter was reset to 00000.

3. What prompted the meter read taken in mid-November 2013? All

other bills show the reads taken toward the end of the month. <u>Response</u>: Attached to this Answer as Exhibit D, and incorporated herein by reference, is a copy of Atmos Energy's business record showing that a "Move-In Read Only" service order was issued for 1901 on October 18, 2013. This date coincides with DH Pace's statement that on October 18, 2013, it requested that the account relating to the commercial building at 1901 be placed in its name. Exhibit D shows that the "move-in read only" meter read took place on November 12, 2013 and that the meter read 1,095 ccf. The reason for the meter reading in mid-November 2013 was to take the reading on the meter due to the account relating to 1901 being placed in DH Pace's name.

4. **Provide proof of change of occupancy.** <u>Response</u>: Exhibit D, attached to this Answer, is the Atmos Energy business record that shows that on October 18, 2013 a move-in read only for 1901 was created. The date that this business record was created coincides with DH Pace's statement that on October 18, 2013, it requested that the account relating to the commercial building at 1901 be placed in its name.

5. Email from Corporation Commission said that meter was installed 6/10/2010 and "rolled over" at some point. Please provide record of any repairs and/or parts replaced on the meter post install date. <u>Response</u>: When IPS ceased being a transportation customer at this location on October 1, 2013, the meter technician changed the meter from Mcf (thousand cubic feet) readings that are required for transportation customers on EFM (electronic flow measurement) devises, to Ccf (hundred cubic feet) because this meter was going back to "sales," and Ccf is required for meters to be read manually in the Itron hand-held meter reading device. At this time the meter technician reset the electronic reading to zero. There were no repairs done nor parts replaced since this meter was installed.

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? <u>Response</u>: The \$6,634.69 balance on the bill for the period 12/27/2013 through 1/27/2014 was for the period between November 12, 2013, when the meter was first read, and December 26, 2013. Atmos Energy did not charge DH Pace for any usage from the previous customer at 1901. In fact, DH Pace was not charged for any of DH Pace's usage at 1901 prior to November 12, 2013.

7. Why was the bill for April 2015 estimated? What estimating procedure was used to determine the estimated usage? <u>Response</u>: Atmos Energy believes its billing system elected to use an estimate for April 2015 rather than the actual usage because the actual usage was different than the prorated usage that showed up on the billing system for April 2014. Atmos Energy used the procedure to estimate April 2015 usage at 1901 based upon its tariffs and policies. Atmos Energy used the prorated usage for April 2014 as the estimate for April 2015. This issue has been corrected.

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? <u>Response</u>: Only the April 2015 bill contained an estimate. See, response above for reason why bill contained an estimate. The original bill was cancelled because Atmos Energy realized that the prorated usage contained in the April 2014 bill should not have been used to estimate the April 2015 usage at 1901.

9. Is there any documentation that states "cause for estimation?" <u>Response</u>: Before the April 2015 estimated bill was generated, the system first automatically generated a request for a re-read and an order was assigned to one of our service technicians, but that technician's work load consisted of other, more-pressing matters that prohibited him from completing the order, and the billing system therefore automatically generated the estimated bill. When the actual reading was obtained for the May 2015 bill a correction was created for the April 2015 bill.

34. Atmos Energy denies that DH Pace is entitled to any refund. Atmos Energy billed DH Pace for its actual usage during the 13-month period in which DH Pace did not receive a bill from Atmos Energy.

35. Atmos Energy denies that DH Pace is entitled to recover consulting or legal fees.

WHEREFORE, for the reasons set forth above, Atmos Energy requests the Commission to issue an order dismissing DH Pace's complaint.

James G Flaherty, #1'1177 **ANDERSON & BYRD, LLP** 216 S. Hickory, P. O. Box 17 Ottawa, Kansas 66067 (785) 242-1234, telephone (785) 242-1279, facsimile <u>jflaherty@andersonbyrd.com</u> Attorneys for Atmos Energy

VERIFICATION

STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for Atmos Energy, named in the foregoing Answer, and is duly authorized to make this affidavit; that he has read the foregoing Answer, and knows the contents thereof; and that the facts set forth therein are true and correct.

James G. Flahe

SUBSCRIBED AND SWORN to before me this 25th day of August, 2015.

NOTARY PUBLIC - State of Kansas **RONDA ROSSMAN** E My Appt. Exp. 5/25/2018

Tou da flossinge

Notary Public

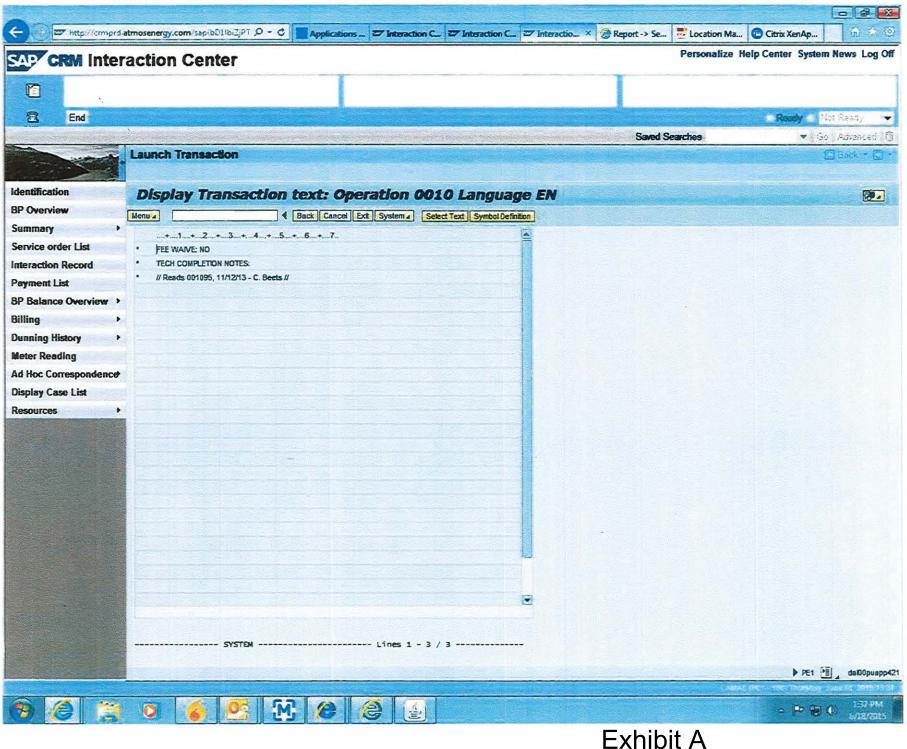
Appointment/Commission Expires:

3

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was mailed, postage prepaid, this 25th day of August, 2015, addressed to: Chris Mann, Executive Vice President /CIO, DH Pace Door Company, Inc., 1901 E. 119th Street, Olathe, Kansas 66061, Michael J. Duenes, Litigation Counsel, Kansas Corporation Commission, 1500 SW Arrowhead Road, Topeka, Kansas 66604-4027 and Leah Mullin, Managed Energy Systems, 6600 College Blvd., Ste. 125, Overland Park, Kansas 66211.

James G. Flaherty



and the second se	raction Genter	alize Help Center System News Log 0
	O / 4002613056 Has an open BPEM case on Business Partner or Contract Ac TH ST, OLATHE, KS 66061-9502	
End End		Ready Mot Ready
	Saved Searches	✓ Go Advanced I
Charles and the	Launch Transaction	🖬 Back 💌 💭
entification	Display Transaction text: Operation 0010 Language EN	2.
P Overview	Menu A Back Cancel Exit System A Select Text Symbol Definition	
ummary	*1*2*3*4*5*6*7.	
ervice order List	* DEAD NTR, VFY MTR NFO.	
teraction Record	LAST READ @ MVIN IN NOV 2014. PLS CHECK MTR, AND NOTE ALL INFO INCLUDING DEAD THANKS	
nyment List	* DOGS	
Balance Overview		
lling	TECH COMPLETION NOTES:	
Inning History	* // ddsvis 1 13 15 096127 reading is 086127 meter is on ## ** Reading: 06	
eter Reading	6127; Meter Serial Number: 086127; Meter Manufacture: DR; Meter Modet 2 M; AMVAMR Serial Number: ; AMVAMR Manufacture: **//	
d Hoc Correspondence		
isplay Case List		
esources		
	SYSTEM Lines 1 - 9 / 9	
		PE1 📲 dal00puap

Exhibit B



BILL TO: International Paper Company ECOVA P O Box 2440 Spokane, WA 99210-2440 CHECK REMITTANCE TO: Atmos Energy P.O. Box 790311 St. Louis, MO 63179-0311

	Page:	1 of 1
ELECTRONIC REMITTANCE TO:	Invoice No:	KS091300300
Atmos Energy Corporation	Invoice Date:	15-Oct-13
US Bank	Customer No:	
ABA# for ACH 081000210	Account No:	003019982538
ABA# for Wire 081000210	Contract No:	KS-00100
Account# 152308790418	Payment Terms:	Net10
Location: St Louis, MO	Due Date:	28-Oct-13
	Total Amount Due:	\$100.00

For billing questions, please call: Kevin Jones @ (913) 254-6330

LINE	PRODUCTION	STATION	PREMISE	STATION NAME	DESCRIPTION	VOLUME	VOLUME UOM	ENERGY	ENERGY UOM		NET AMOUNT
1	Sep-13	580177		INTERNATIONAL PAPER	Transportation Services	35	CCF*	4	DTH	0.1370	\$4.80
2	Sep-13	580177		INTERNATIONAL PAPER	Franchise Fee						\$0.25
3	Sep-13	580177		INTERNATIONAL PAPER	Ad Valorem	35	CCF*	4	DTH	0.0084	\$0.29
4	Sep-13	580177		INTERNATIONAL PAPER	Franchise Fee						\$0.02
5	Sep-13	580177		INTERNATIONAL PAPER	Franchise Fee Div 81	35	CCF*	4	DTH	0.0184	\$0.65
6	Sep-13	580177		INTERNATIONAL PAPER	Facility Charge Div 81						\$81.00
7	Sep-13	580177		INTERNATIONAL PAPER	Kansas GSRS Surcharge						\$8.29
8	Sep-13	580177		INTERNATIONAL PAPER	Franchise Fee						\$0.44
9	Sep-13	580177		INTERNATIONAL PAPER	Franchise Fee					×	\$4.26
			Sub	ototal for Station 580177							\$100.00
			Sub	total for Production Date	Sep-13	35	CCF	4	DTH		\$100.00
								Total Charge	s		\$100.00
								Total Charge	s		\$

Total Amount Due \$100.00

Previous Balance





BILL TO: International Paper Company ECOVA P O Box 2440 Spokane, WA 99210-2440 CHECK REMITTANCE TO: Atmos Energy P.O. Box 790311 St. Louis, MO 63179-0311

	Page:	1 of 1
ELECTRONIC REMITTANCE TO:	Invoice No:	KS081300518
Atmos Energy Corporation	Invoice Date:	18-Sep-13
US Bank	Customer No:	
ABA# for ACH 081000210	Account No:	003019982538
ABA# for Wire 081000210	Contract No:	KS-00100
Account# 152308790418	Payment Terms:	Net10
Location: St Louis, MO	Due Date:	1-Oct-13
	Total Amount Due:	\$98.10

Total Charges

Previous Balance

Total Amount Due

For billing questions, please call: Kevin Jones @ (913) 254-6330

LINE	PRODUCTION DATE	STATION	PREMISE	STATION NAME	DESCRIPTION	VOLUME	VOLUME UOM	ENERGY	ENERGY UOM	UNIT AMOUNT	NET AMOUNT
1	Aug-13	580177		INTERNATIONAL PAPER	Transportation Services	24	CCF*	2	DTH	0.1370	\$3.29
2	Aug-13	580177		INTERNATIONAL PAPER	Franchise Fee						\$0.17
3	Aug-13	580177		INTERNATIONAL PAPER	Ad Valorem	24	CCF*	2	DTH	0.0084	\$0.20
4	Aug-13	580177		INTERNATIONAL PAPER	Franchise Fee						\$0.01
5	Aug-13	580177		INTERNATIONAL PAPER	Franchise Fee Div 81	24	CCF*	2	DTH	0.0184	\$0.44
6	Aug-13	580177		INTERNATIONAL PAPER	Facility Charge Div 81						\$81.00
7	Aug-13	580177	*	INTERNATIONAL PAPER	Kansas GSRS Surcharge						\$8.29
8	Aug-13	580177		INTERNATIONAL PAPER	Franchise Fee						\$0.44
9	Aug-13	580177		INTERNATIONAL PAPER	Franchise Fee						\$4.26
			Su	btotal for Station 580177							\$98.10
			Su	btotal for Production Date	Aug-13	24	CCF	2	DTH		\$98.10

\$98.10

\$98.10

Report Date: 10/1/2013

Site Id: 580177-1002346 Site Name: INTERNATIONAL PAPERS-O Site Location: 1901 W 119TH ST,OLATHE

Report Date: 10/1/201

9:00:00 AM

Start Time:

			Sum	Sum	Maximum	Minimum	Average	Minimum	Maximum	Average	Average	Average
			Incremental Cor Vonc	remental Unc V	coterval Avg Pressu	Interval Avg Temp						
Date		Records per day	MCF	CCF	PSIG	F				-		
	9/1/2013	24	0	0	59.82	64.54						
	9/2/2013	24	0	0	59.76	63.01						
	9/3/2013	24	0	0	59.76	67.24						
	9/4/2013	24	0	0	59.76	66.64						
	9/5/2013	24	0	0	59.75	71.21						
	9/6/2013	24	0	0	59.75	73.32						
	9/7/2013	24	0	0	59.60	77.29						
	9/8/2013	24	0	0	59.74	77.29						
	9/9/2013	24	0	0	59.80	76.20						
	9/10/2013	24	0	0	59.61	72.96						
	9/11/2013	24	0	0	59.60	74.03						
	9/12/2013	24	0	0	59.76	62.68						
	9/13/2013	24	0	0	59.85	56.56						
	9/14/2013	24	0	0	59.76	67.08						
	9/15/2013	24	0	0	59.77	59.85						
	9/16/2013	24	I	2	59.75	61.17						
	9/17/2013	24	2	3	59.47	63.69						
	9/18/2013	24	0	0	59.62	74.21						
	9/19/2013	24	0	0	59.76	59.68						
	9/20/2013	24	0	0	59.77	51.52						
	9/21/2013	24	0	0	59.92	56.25						
	9/22/2013	24	0	1	59.77	55,43						
	9/23/2013	24	1	2	59.76	62.01						
	9/24/2013	24	0	0	59.77	57.21						
	9/25/2013	24	0	0	59.75	61.51						
	9/26/2013	24	0	0	59.76	66.74						
	9/27/2013	24	0	0	59.76	65.73						
	9/28/2013	24	0	0	59.63	50.23						
	9/29/2013	24	0	0	59.77	53.47						
	9/30/2013	24	0	0	59.77	61.84						
		Total Records	Sum	Sum	Maximum	Minimum	Average	Minimum	Maximum	Average	Average	Average
		720	4	8	59.92	50.23						
				Ć	Page: 1	10/1/2013 1:31:31 PN		Digit	tal I	ndex	Set +	00000 0

3. 1

End	ST , OLATHE, KS 66061-95	02	57					
edes kipica og det						elenseeren		Ready 🔿 Not Ready
	a service and the present of		al and a second second	alla meneralationa	velselatio la service	Saved Search	18	🔻 🖁 Ga 🖗 Advanc
	Service Order Update							🖸 Back 🝷
in the second	Save and Back XCancel	Cancel S/O						
energe kindel	Service Order is comple	eted						
diam'ny ara 🕨								
List cord	Update Service Orde	er at 1901 E 119	TH ST, OLAT	HE,KS				
			······································			**************************************		
verview +		First Name						100000815499
		Last Name						Select Service Order Type
ny 🔸	States and states and states and states	usiness Partner #	DH PACE CO		2000220167	Service On	der Activity	Select Activity
9	Street Number / Na							
spondence [*]		/ State / Zip code		KS 66061-9	502			
List	T	elephone Number	816-221-0543					
-191								
al company and		-						
	[Get Appointment 🙆 Bo	ok Appointment	Override Appointr	nent After Hours				
	Appointment Details				Status	0	Service	Order 100000815499
	Start Date 11/0		e 07:00 AM	End Date	11/08/2013		End Time 11:59 PM	
	Order Descr Move	In - Read Only	n	Contact Number				
					Charge	20.00		
	Service Order Notes FEE	WAIVE: NO H COMPLETION N	OTES.					
	// Re	ads 001095, 11/12/	/13 - C. Beets //					
H PACE CO / 40	002613056							
901 E 119TH ST	T , OLATHE, KS 66061-950	2				<u>j</u>		C Ready C Not Ready
no none paivie et altra	a new contract of the contract of the	na estadora estadora escara				Saved Searches	n an	▼ Go # Advanced
- Contraction						Oaved Osaiclisa	0	◆ § Go § Advanced
Se Se	ervice Order List							🖸 Back 🕶
								i de la serie de la companya de la c
		rvice Order Desc.	Status	Date Create			Completed	Service Order Notes
let.	100000815499 Mo	we In - Read Only	Complete	10/18/2013	11/06/201	3 11/12	2013	FEE WAIVE: NO
) List cord								
cord								
ord								
ord								

Exhibit D