

REDACTED

DIRECT TESTIMONY

OF

ERIC LOUNSBERRY

ENGINEERING DEPARTMENT

ENERGY DIVISION

ILLINOIS COMMERCE COMMISSION

CENTRAL ILLINOIS LIGHT COMPANY

d/b/a AmerenCILCO

DOCKET NO. 04-0673

March 7, 2006

Confidential Information Identified As

BEGIN CONF\*\*\*XXX\*\*\*END CONF

1 Q. Please state your name and business address.

2 A. My name is Eric Lounsberry, and my business address is 527 East Capitol  
3 Avenue, Springfield, Illinois 62701.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by the Illinois Commerce Commission (“Commission”) as a  
6 Supervisor of the Gas Section of the Engineering Department of the Energy  
7 Division.

8 Q. Please state your educational background and work experience.

9 A. I received a Bachelor of Science degree in Civil Engineering from the University  
10 of Illinois and a Master of Business Administration degree from Sangamon State  
11 University (now known as University of Illinois at Springfield).

12 Q. What are your primary responsibilities and duties as the Supervisor of the Gas  
13 Section of the Energy Division's Engineering Department?

14 A. I assign my employees or myself to cases, provide training, and review work  
15 products over the various areas of responsibility covered by the Gas Section. In  
16 particular, the responsibilities and duties of Gas Section employees include  
17 performing studies and analyses dealing with day-to-day and long term,  
18 operations and planning for the gas utilities serving Illinois. For example, Gas  
19 Section employees review purchased gas adjustment clause reconciliations, rate  
20 base additions, levels of natural gas used for working capital, and utility

21 applications for Certificates of Public Convenience and Necessity. They also  
22 perform audits of utility gas meter shops.

23 Q. What is the purpose of this proceeding?

24 A. On November 10, 2004, the Commission initiated its annual reconciliation of the  
25 Purchase Gas Adjustment (“PGA”) for fiscal year 2004, as filed by Central Illinois  
26 Light Company (“AmerenCILCO” or “Company”), pursuant to Section 9-220 of  
27 the Illinois Public Utilities Act. This investigation was initiated to determine  
28 whether AmerenCILCO’s PGA clause reflects actual costs of gas and gas  
29 transportation for the twelve-month period from January 1, 2004 through  
30 December 31, 2004, and whether those purchases were prudent.

31 Q. What is your assignment within this proceeding?

32 A. My assignment is to determine if AmerenCILCO’s natural gas purchasing  
33 decisions made during the reconciliation period were prudent.

34 Q. Do you have any schedules attached to you testimony?

35 A. Yes. I have the following schedules attached to my testimony:

36	Schedule 2.01	Summary of Adjustments
37	Schedule 2.02	Storage Allocation Calculation
38	Schedule 2.03	Lincoln Storage Field – 2004 Inventory Adjustment
39	Schedule 2.04	Lincoln Storage Field – 2003 Inventory Adjustment
40	Schedule 2.05	Glasford Storage Field – 2003 Inventory Adjustment
41	Schedule 2.06	Glasford Storage Field Adjustment
42	Schedule 2.07	Lincoln Storage Field Adjustment

43 Schedule 2.08 Glasford Storage Field 2004 Withdrawals  
44 Schedule 2.09 Lincoln Storage Field 2004 Withdrawals

45 Q. Have you made a determination as to whether AmerenCILCO's natural  
46 gas purchasing decisions were prudent?

47 A. Yes. Using the Commission's criteria for prudence, I found no reason to dispute  
48 the Company's assertion that all gas supply purchases were prudently incurred  
49 during the reconciliation period. However, I did discover an allocation problem  
50 involving the inventory adjustments that that Company made at its Company-  
51 owned storage fields. Using the correct inventory adjustment allocation method  
52 results in a reduction of \$105,832 in gas costs.

53 Q. What criteria does the Commission use to determine prudence?

54 A. The Commission has defined prudence as:

55 **[...] that standard of care which a reasonable person would be**  
56 **expected to exercise under the circumstances encountered by**  
57 **utility management at the time decisions had to be made. In**  
58 **determining whether a judgment was prudently made, only**  
59 **those facts available at the time the judgment was exercised**  
60 **can be considered. Hindsight review is impermissible.**

61 **Imprudence cannot be sustained by substituting one's**  
62 **judgment for that of another. The prudence standard**  
63 **recognizes that reasonable persons can have honest**  
64 **differences of opinion without one or the other necessarily**  
65 **being 'imprudent'. (Commission v. Commonwealth Edison**  
66 **Company, Docket No. 84-0395, Order dated October 7, 1987,**  
67 **page 17).**

68 Q. What material did you review to determine the prudence of AmerenCILCO's  
69 natural gas purchasing decisions during the reconciliation period?

70 A. I reviewed the direct testimony of Company witnesses Paul W. Mertens  
71 (AmerenCILCO Exhibit No. 1.0) and Vonda K. Seckler (AmerenCILCO Exhibit  
72 No. 2.0). I also reviewed Company responses to numerous Staff data requests  
73 and documents at the Company's headquarters that directly addressed issues  
74 related to the prudence of AmerenCILCO's natural gas purchasing.

### 75 **Company-Owned Storage Inventory Adjustments**

76 Q. What are inventory adjustments to a Company-owned storage field?

77 A. As the Company has used the term in this proceeding, an inventory adjustment is  
78 the reduction of a certain volume of natural gas from the volume the Company  
79 assumes it can withdraw from its Company-owned storage fields during the  
80 winter season.

81 Q. Are inventory adjustments a common occurrence with natural gas storage fields  
82 that operate in Illinois?

83 A. Yes. Many Illinois utilities make inventory adjustments to their Company-owned  
84 storage fields to account for the performance reductions in the fields. These  
85 types of adjustments have also been referred to as "maintenance gas" or "gas  
86 lost in storage" adjustments.

87 Q. Did the Company make any inventory adjustments that impacted the cost of gas  
88 during the reconciliation period?

89 A. Yes. BEGIN CONF\*\*\*XX  
90 XXX  
91 XXX  
92 XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX\*\*END CONF My understanding is that  
93 these inventory adjustments impacted the weighted average cost of gas that was  
94 withdrawn from the Company-owned storage fields during the months when  
95 withdrawals took place in the 2004 reconciliation period.

96 Q. Have the Company's inventory adjustments to its storage fields ever been an  
97 issue in prior PGA reconciliations?

98 A. Yes. In the Company's 2002 reconciliation, Docket No. 02-0717, Staff argued  
99 the costs associated with the inventory adjustments were not a gas cost  
100 recoverable through the PGA. The Commission concluded that the Company  
101 should be allowed to recover the costs through the PGA. This determination was  
102 based upon the timing of the Company's rate case (Docket No. 02-0837), which  
103 was conducted simultaneously with the reconciliation. The costs in question  
104 were not included in the rate case, thus the Commission reasoned that fairness  
105 required that the Company be allowed to recover the costs through the PGA.  
106 The Company was placed on notice that "at the earliest time possible, CILCO is  
107 to change the manner in which it treats these costs and recover them through

108 base rates rather than through the PGA.” (Order, Docket No. 02-0717, p. 5  
109 (August 4, 2004))

110 Q. Do you object to the inclusion of these costs in this reconciliation?

111 A. No. The Company has not yet filed another rate case that would allow it to  
112 recover these costs through base rates, thus in my opinion the recovery of the  
113 2004 costs through the PGA is consistent with the Commission Order in Docket  
114 No. 02-0717.

115 Q. What are your concerns regarding the inventory adjustments?

116 A. I believe that PGA customers are not the only customer class that receives  
117 benefits from Company-owned storage fields and should not have all of the  
118 inventory adjustment costs allocated to them through the PGA.

119 Q. How does the Company currently allocate its Company-owned storage field  
120 inventory adjustments?

121 A. The Company’s proposal allocates 100% of the costs to PGA customers.

122 Q. Was the allocation of the inventory adjustment an issue during the Company’s  
123 2002 PGA reconciliation, Docket No. 02-0717?

124 A. No. Staff’s recommendation in that proceeding was that the inventory  
125 adjustment was not a gas cost that should flow through the PGA. Therefore,  
126 whether or not those costs should be subject to an allocation between customer  
127 groups was never discussed.

128 Q. Do you consider allocating 100% of the costs associated with the storage  
129 inventory adjustment to PGA customers reasonable?

130 A. No. In my opinion the cost associated with the storage inventory adjustment  
131 should be allowed between sales (PGA) customers and transportation customers  
132 proportionate to the relative benefit they derive from the storage function. This  
133 treatment would be consistent with the Commission's finding regarding the  
134 allocation of storage costs from the Company's most recent natural gas rate  
135 case, Docket No. 02-0837. The Commission's Order in that rate case discusses,  
136 in detail, on pages 91-95, the allocation of storage costs and working gas  
137 inventories between transportation customers and sales (PGA) customers.

138 The Order summarizes the Company's position in that proceeding as follows:

139 **CILCO proposed that 60% of storage costs be assigned to the**  
140 **supplemental supply function, 8% to the peaking function and,**  
141 **32% to the balancing function. (CILCO Ex. 5.0 at 10)**  
142 **Furthermore, CILCO proposed that storage costs be imposed**  
143 **equally on sales and transportation customers. (Order, Docket**  
144 **No. 02-0837, p. 91 (October 17, 2003))**

145 The Order also indicated that no party disputed the allocation of storage among  
146 the three functions. But, the Commission did not agree to allocate the costs  
147 equally between sales and transportation customers. (See Order, p. 94) The  
148 Commission adopted the IIEC's alternative allocator for storage supplies (*Id.*)

149 Q. What rationale did the Commission provide for its conclusion on this topic in  
150 Docket No. 02-0837?

151 A. The Commission stated the following:

152           **The Commission adopts IIEC’s alternative allocator for storage**  
153           **supply costs. As previously stated, the Commission rejects**  
154           **IIEC’s assertion that transportation customers derive no**  
155           **benefit from the storage supply function as well as CILCO’s**  
156           **position that transportation and sales customers benefit**  
157           **equally from the storage supply function. In view of the fact**  
158           **that it suggested an alternative allocator in its surrebuttal**  
159           **testimony, it appears that CILCO concedes it is appropriate to**  
160           **allocate a greater portion of storage supply costs to sales**  
161           **customers than to transportation customers. For all of these**  
162           **reasons, the Commission finds IIEC’s alternative allocator for**  
163           **storage supply cost will best match the storage supply costs**  
164           **allocated to transportation customers with the benefits those**  
165           **customers derive from the service. (Order, Docket No. 02-**  
166           **0837, p. 94)**

167           The Commission also concluded that:

168           **The Commission finds that neither CILCO’s proposal to**  
169           **allocate the carrying costs of working gas inventory equally**  
170           **between sales and transportation customers, nor Staff’s and**  
171           **IIEC’s proposal that such costs should be allocated only to**  
172           **sales customers is appropriate. Instead, the Commission**  
173           **finds that the carrying costs of working gas inventory should**  
174           **be allocated between sales and transportation customers**  
175           **using the alternative allocator proposed by IIEC, and adopted**  
176           **by the Commission above, for use in allocating supplemental**  
177           **supply function costs between these groups of customers. In**  
178           **the Commission’s view, while no party specifically proposed**  
179           **IIEC’s alternative allocator for this purpose, use of this**  
180           **allocator is appropriate because it will cause a portion, but not**  
181           **an equal portion, of carrying costs associated with working**  
182           **gas inventory to be allocated to transportation customers.**  
183           **(Order, Docket No. 02-0837, p. 95)**

184    Q.     Does the Commission Order in Docket No. 02-0837 state specifically what  
185           allocation it was adopting?

186    A.     No. It does not.

187 Q. Has any other Commission Order addressed the appropriate recovery method for  
188 gas lost in Company-owned underground storage fields?

189 A. Yes. Subsequent to the issuance of the 2002 AmerenCILCO PGA Order,  
190 Central Illinois Public Service Company (“CIPS”) argued in its 2003 reconciliation  
191 that it should be allowed to recover the cost of gas lost in storage through its  
192 PGA. The Commission concurred with Staff that CIPS should not be allowed to  
193 recover these costs through the PGA. Instead, the Commission found that the  
194 costs are recoverable through base rates and should be recovered in Account  
195 352.3 or Account 823. Specifically, the Order indicated the following:

196 **At issue is the regulatory treatment of gas that is lost in the**  
197 **underground storage fields owned and operated by CIPS. The**  
198 **Company and Staff agree that CIPS may recover the costs, but**  
199 **disagree as to whether CIPS is entitled to recover these costs**  
200 **through the PGA.**

201 **The Commission concludes that CIPS should not be allowed**  
202 **to recover the lost gas costs at issue here through the PGA.**  
203 **Staff has not taken a position that these are non-recoverable**  
204 **costs, simply non-recoverable through the PGA. The**  
205 **Commission finds that the costs in question are certainly**  
206 **recoverable through base rates and should be recovered in**  
207 **either Account 352.3 or Account 823. The Commission is of**  
208 **the opinion that the CILCO case cited by CIPS does not**  
209 **provide a basis for CIPS to recover the lost gas costs through**  
210 **the PGA. In contrast to the showing made by CILCO in the**  
211 **case cited, CIPS can make no claim that it was given the**  
212 **“okay” by Staff to recover the lost gas cost through the PGA,**  
213 **nor has CIPS been recovering the lost gas through the PGA in**  
214 **previous reconciliations. (Order, Docket No. 03-0696, p. 5 (July**  
215 **13, 2005))**

216 Q. What do the Commission’s conclusions from Docket Nos. 02-0837 and 03-0696  
217 indicate to you regarding the inventory adjustment cost for this proceeding?

218 A. Since the Commission in AmerenCILCO's last natural gas rate case found that a  
219 portion of the various storage costs recovered through base rates should be  
220 allocated to transportation customers, I would consider it inconsistent if the same  
221 treatment was not provided to the cost associated with inventory adjustments  
222 whose costs flow through the PGA. Inventory adjustments ensure for all of the  
223 Company's customers, both PGA and transportation, that the Company-owned  
224 storage facilities continue to operate properly. Both PGA and transportation  
225 customers derive benefits from the storage facilities. Thus, to pass the entire  
226 cost associated with the inventory adjustments to PGA customers would be  
227 inequitable. Therefore, the costs associated with inventory adjustments should  
228 be allocated between the two groups.

229 Q. How would AmerenCILCO treat the inventory adjustment amounts if those costs  
230 were passed through base rates instead of the PGA?

231 A. According to the Company's response to Staff data request ENG 1.70, the  
232 Company would allocate the inventory adjustment costs to Account 823. This is  
233 consistent with the Commission findings, set out above, in regards to where  
234 CIPS' cost should be recovered in Docket No. 03-0696. Amounts included in  
235 Account 823 are a storage supply cost that should be allocated to both PGA and  
236 transportation customers, consistent with the Commission Order in Docket No.  
237 02-0837.

238 Q. What is your recommendation regarding the allocation of costs associated with  
239 the inventory adjustments?

240 A. In order to be consistent with the Commission's prior Order and to ensure  
241 equitable treatment to PGA customers, I recommend the Company use the same  
242 allocation factors that the Commission directed it to use in Docket No. 02-0837 to  
243 allocate the cost of the inventory adjustments between PGA customers and  
244 transportation customers.

245 Q. As the Commission Order in Docket No. 02-0837 did not state specifically what  
246 allocation it was adopting, please explain how you determined the allocation  
247 percentage?

248 A. I requested that the Company, in Staff data request ENG 1.69, provide me with  
249 the allocation percentages for sales and transportation that the Commission used  
250 in Docket No. 02-0837 for storage supply costs. In response to this request the  
251 Company provided a summary of the resulting allocation percentages between  
252 seasonal use and balancing for multiple rate classes. Using those values, I  
253 found the weighted average overall storage allocation between sales and  
254 transportation customer to determine an overall allocation percentage. This  
255 calculation is shown on ICC Staff Ex. 2.0, Schedule 2.02 and shows that PGA  
256 customers should only be allocated BEGIN CONF\*\*\* XXXXX \*\*\*END CONF of  
257 the inventory adjustment costs.

258 Q. How does this allocation impact the storage adjustments the Company made  
259 during the 2004 reconciliation?

260 A. As shown on ICC Staff Ex. 2.0, Schedule 2.02, the impact of allocating only  
261 BEGIN CONF\*\*\* XXXXX \*\*\*END CONF of the storage adjustment costs to PGA  
262 customers results in the reduction of \$105,832 in PGA costs.

263 Q. How did you calculate the \$105,832 adjustment?

264 A. As shown on ICC Staff Ex. 2.0, Schedules 2.03 through 2.09, the adjustment is  
265 broken down by individual storage field. This was done because when the  
266 Company made inventory adjustments the impact was seen in the weighted  
267 average cost of gas ("WACOG") contained within each storage field. Therefore,  
268 to back out the impact of the different WACOG, a new WACOG had to be  
269 calculated based on only accounting for BEGIN CONF\*\*\* XXXXX \*\*\*END CONF  
270 of the inventory adjustment. The difference between these two WACOG  
271 calculations resulted in a per unit adjustment for each unit of volume withdrawn  
272 from the Company-owned storage fields during the 2004 reconciliation period.

273 Since the Company-owned storage fields operate on a seasonal basis (injections  
274 made during non-winter months and withdrawal are made during the winter  
275 season), multiple per unit adjustments were necessary. For example, the instant  
276 proceeding is for the 2004 calendar year, so an inventory adjustment during the  
277 2003 injection season for a specific storage field would impact the per unit price  
278 for the 2004 withdrawal season for that field in January and running through the  
279 end of that field's remaining withdrawal season. Whereas an inventory  
280 adjustment during the 2004 injection season for that same field would only  
281 impact the WACOG for the months of November and December of the

282 reconciliation period (but would also have an impact on the 2005 reconciliation  
283 period). The per unit WACOG adjustment calculations are shown on ICC Staff  
284 Exhibit 2.0, Schedules 2.03 through 2.05.

285 Finally, I took the per unit WACOG adjustments and multiplied those values by  
286 the actual withdrawal volumes for each Company-owned storage field in each  
287 impacted month of the reconciliation period to calculate the adjustment for each  
288 Company-owned storage field. As shown on ICC Staff Ex. 2.0, Schedules 2.06  
289 and 2.07, the impact of these adjustments results in a reduction to gas cost of  
290 \$45,630 for the Glasford storage field and \$60,202 for the Lincoln storage field.

291 Q. Does this conclude your direct testimony?

292 A. Yes.

## Summary of Adjustments

1	Inventory Adjustment at Lincoln Storage Field	\$60,202
2	Inventory Adjustment at Glasford Storage Field	\$45,630
3	Total	\$105,832

Row 1 = ICC Staff Exhibit 2.0, Schedule 2.07  
Row 2 = ICC Staff Exhibit 2.0, Schedule 2.06  
Row 3 = Row 1 + Row 2

# Storage Allocation Calculation

Rate Class	Seasonal (therms)	Bank Balance (therms)	Total (therms)
RC 600	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX
RC 650	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX
RC 700	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX
Total	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX
Percent of Total	XXXXXXXXXXXXXX	XXXXXXXXXXXXXX	

Source: Company Response to Staff Data Request ENG 1.69

## Lincoln Storage Field 2004 Inventory Adjustment

	October w/o Adj.	October w/ Co. Adj	October w/ Staff Adj.
1	Ending Inventory	XXXXXXXXXXXXX	XXXXXXXXXXXXX
2	Inventory Adjustment	XXXXXXXXXXXXX	XXXXXXXXXXXXX
3	Adjusted Inventory	XXXXXXXXXXXXX	XXXXXXXXXXXXX
4	Ending Storage Cost	XXXXXXXXXXXXX	XXXXXXXXXXXXX
5	Ending Weighted Cost	XXXXXXXXXXXXX	XXXXXXXXXXXXX
6	Adjustment per Unit	\$0.0163	

Row 1 = Per Company Response to Staff Data Request ENG 1.68  
Row 2 = Per Company Response to Staff Data Request ENG 1.68  
Row 3 = Row 1 - Row 2  
Row 4 = Per Company Response to Staff Data Request ENG 1.68  
Row 5 = Row 4 / Row 3  
Row 6 = Row 5 Company Adjustment Value - Row 5 Staff Adjustment Value

## Lincoln Storage Field 2003 Inventory Adjustment

		October w/o Adj.	October w/ Co. Adj	October w/ Staff Adj.
1	Ending Inventory	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX
2	Inventory Adjustment	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX
3	Adjusted Inventory	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX
4	Ending Storage Cost	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX
5	Ending Weighted Cost	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX	XXXXXXXXXXXXXXXX
6	Adjustment per Unit		\$0.0151	

Row 1 = Per Company Response to Staff Data Request ENG 1.68  
 Row 2 = Per Company Response to Staff Data Request ENG 1.68  
 Row 3 = Row 1 - Row 2  
 Row 4 = Per Company Response to Staff Data Request ENG 1.68  
 Row 5 = Row 4 / Row 3  
 Row 6 = Row 5 Company Adjustment Value - Row 5 Staff Adjustment Value

## Glasford Storage Field 2003 Inventory Adjustment

	October w/o Adj.	October w/ Co. Adj	October w/ Staff Adj.
1 Ending Inventory	XXXXXXXXXXXXX	XXXXXXXXXXXXX	XXXXXXXXXXXXX
2 Inventory Adjustment	XXXXXXXXXXXXX	XXXXXXXXXXXXX	XXXXXXXXXXXXX
3 Adjusted Inventory	XXXXXXXXXXXXX	XXXXXXXXXXXXX	XXXXXXXXXXXXX
4 Ending Storage Cost	XXXXXXXXXXXXX	XXXXXXXXXXXXX	XXXXXXXXXXXXX
5 Ending Weighted Cost	XXXXXXXXXXXXX	XXXXXXXXXXXXX	XXXXXXXXXXXXX
6 Adjustment per Unit		\$0.0165	

Row 1 = Per Company Response to Staff Data Request ENG 1.68  
 Row 2 = Per Company Response to Staff Data Request ENG 1.68  
 Row 3 = Row 1 - Row 2  
 Row 4 = Per Company Response to Staff Data Request ENG 1.68  
 Row 5 = Row 4 / Row 3  
 Row 6 = Row 5 Company Adjustment Value - Row 5 Staff Adjustment Value

# Glasford Storage Field Adjustment

Month	Volume (Mcf) (1)	Per Unit (\$/Mcf) (2)	Adjustment (3)
January	XXXXXXXXXX	0.0165	XXXXXXXXXXXXXXXXXX
February	XXXXXXXXXX	0.0165	XXXXXXXXXXXXXXXXXX
March	XXXXXXXXXX	0.0165	XXXXXXXXXXXXXXXXXX
April	XXXXXXXXXX	0.0165	XXXXXXXXXXXXXXXXXX
May	XXXXXXXXXX	0.0165	XXXXXXXXXXXXXXXXXX
Total			\$45,630.39

Column 1 = ICC Staff Exhibit 2.0, Schedule 2.08

Column 2 = ICC Staff Exhibit 2.0, Schedule 2.05

Column 3 = Column 1 \* Column 2

# Lincoln Storage Field Adjustment

	Volume (Mcf) (1)	Per Unit (\$/Mcf) (2)	Adjustment (3)
January	XXXXXXXXXX	0.0151	XXXXXXXXXXXXXX
February	XXXXXXXXXX	0.0151	XXXXXXXXXXXXXX
March	XXXXXXXXXX	0.0151	XXXXXXXXXXXXXX
April	XXXXXXXXXX	0.0151	XXXXXXXXXXXXXX
May	XXXXXXXXXX	0.0151	XXXXXXXXXXXXXX
November	XXXXXXXXXX	0.0163	XXXXXXXXXXXXXX
December	XXXXXXXXXX	0.0163	XXXXXXXXXXXXXX
Total			\$60,202.08

Column 1 = ICC Staff Exhibit 2.0, Schedule 2.09  
Column 2 = ICC Staff Exhibit 2.0, Schedules 2.03 and 2.04  
Column 3 = Column 1 \* Column 2

# Glasford Storage Field 2004 Withdrawals

	January (Mcf)	February (Mcf)	March (Mcf)	April (Mcf)	May (Mcf)
1	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
2	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
3	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
4	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
5	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
6	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
7	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
8	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
9	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
10	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
11	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
12	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
13	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
14	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
15	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
16	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
17	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
18	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
19	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
20	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
21	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
22	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
23	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
24	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
25	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
26	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
27	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
28	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
29	XXXXXXXXXX		XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
30	XXXXXXXXXX		XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
31	XXXXXXXXXX		XXXXXXXXXX		XXXXXXXXXX
Total	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX

Source: Company Response to Staff Data Request ENG 1.05

## Lincoln Storage Field 2004 Withdrawals

	January (Mcf)	February (Mcf)	March (Mcf)	April (Mcf)	May (Mcf)	November (Mcf)	December (Mcf)
1	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
2	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
3	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
4	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
5	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
6	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
7	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
8	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
9	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
10	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
11	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
12	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
13	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
14	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
15	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
16	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
17	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
18	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
19	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
20	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
21	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
22	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
23	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
24	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
25	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
26	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
27	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
28	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
29	XXXXXXXXXX		XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
30	XXXXXXXXXX		XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX
31	XXXXXXXXXX		XXXXXXXXXX		XXXXXXXXXX		XXXXXXXXXX
Total	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX	XXXXXXXXXX

Source: Company's Response to Staff Data Request ENG 1.05