

REVISED
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

June 27, 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 2.01R	Summary of Adjustments
37	Schedule 2.02R	Storage Allocation Calculation
38	Schedule 2.03R	Lincoln Storage Field – 2004 Inventory Adjustment
39	Schedule 2.04R	Lincoln Storage Field – 2003 Inventory Adjustment
40	Schedule 2.05R	Glasford Storage Field – 2003 Inventory Adjustment
41	Schedule 2.06R	Glasford Storage Field Adjustment
42	Schedule 2.07R	Lincoln Storage Field Adjustment

43 Schedule 2.08R Glasford Storage Field 2004 Withdrawals
44 Schedule 2.09R 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 XXX***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. 2.0R, Schedule 2.02R and shows that PGA
256 customers should only be allocated 87.93% of the inventory adjustment costs.

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

259 A. As shown on ICC Staff Ex. 2.0R, Schedule 2.01R, the impact of allocating only
260 87.93% of the storage adjustment costs to PGA customers results in the
261 reduction of \$105,832 in PGA costs.

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

263 A. As shown on ICC Staff Ex. 2.0R, Schedules 2.03R through 2.09R, the
264 adjustment is broken down by individual storage field. This was done because
265 when the Company made inventory adjustments the impact was seen in the
266 weighted average cost of gas ("WACOG") contained within each storage field.
267 Therefore, to back out the impact of the different WACOG, a new WACOG had to
268 be calculated based on only accounting for 87.93% of the inventory adjustment.
269 The difference between these two WACOG calculations resulted in a per unit
270 adjustment for each unit of volume withdrawn from the Company-owned storage
271 fields during the 2004 reconciliation period.

272 Since the Company-owned storage fields operate on a seasonal basis (injections
273 made during non-winter months and withdrawal are made during the winter
274 season), multiple per unit adjustments were necessary. For example, the instant
275 proceeding is for the 2004 calendar year, so an inventory adjustment during the
276 2003 injection season for a specific storage field would impact the per unit price
277 for the 2004 withdrawal season for that field in January and running through the
278 end of that field's remaining withdrawal season. Whereas an inventory
279 adjustment during the 2004 injection season for that same field would only
280 impact the WACOG for the months of November and December of the
281 reconciliation period (but would also have an impact on the 2005 reconciliation
282 period). The per unit WACOG adjustment calculations are shown on ICC Staff
283 Exhibit 2.0R, Schedules 2.03R through 2.05R.

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

291 Q. Does this conclude your revised 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 2.0R, Schedule 2.07R
Row 2 = ICC Staff Exhibit 2.0R, Schedule 2.06R
Row 3 = Row 1 + Row 2

Storage Allocation Calculation

Rate Class	Seasonal (therms)	Bank Balance (therms)	Total (therms)
RC 600	xxxxxxxx	xxxxxxxx	xxxxxxxx
RC 650	xxxxxxxx	xxxxxxxx	xxxxxxxx
RC 700	xxxxxxxx	xxxxxxxx	xxxxxxxx
Total	xxxxxxxx	xxxxxxxx	xxxxxxxx
Percent of Total	87.93	12.07	

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	xxxxxx	xxxxxx	xxxxxx
2 Inventory Adjustment	xxxxxx	xxxxxx	xxxxxx
3 Adjusted Inventory	xxxxxx	xxxxxx	xxxxxx
4 Ending Storage Cost	xxxxxx	xxxxxx	xxxxxx
5 Ending Weighted Cost	xxxxxx	xxxxxx	xxxxxx
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	xxxxxx	xxxxxx	xxxxxx
2	Inventory Adjustment	xxxxxx	xxxxxx	xxxxxx
3	Adjusted Inventory	xxxxxx	xxxxxx	xxxxxx
4	Ending Storage Cost	xxxxxx	xxxxxx	xxxxxx
5	Ending Weighted Cost	xxxxxx	xxxxxx	xxxxxx
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	xxxxxx	xxxxxx	xxxxxx
2 Inventory Adjustment	xxxxxx	xxxxxx	xxxxxx
3 Adjusted Inventory	xxxxxx	xxxxxx	xxxxxx
4 Ending Storage Cost	xxxxxx	xxxxxx	xxxxxx
5 Ending Weighted Cost	xxxxxx	xxxxxx	xxxxxx
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	xxxxxx	0.0165	xxxxxx
February	xxxxxx	0.0165	xxxxxx
March	xxxxxx	0.0165	xxxxxx
April	xxxxxx	0.0165	xxxxxx
May	xxxxxx	0.0165	xxxxxx
Total			\$45,630.39

Column 1 = ICC Staff Exhibit 2.0R, Schedule 2.08R

Column 2 = ICC Staff Exhibit 2.0R, Schedule 2.05R

Column 3 = Column 1 * Column 2

Lincoln Storage Field Adjustment

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

Column 1 = ICC Staff Exhibit 2.0R, Schedule 2.09R

Column 2 = ICC Staff Exhibit 2.0R, Schedules 2.03R and 2.04R

Column 3 = Column 1 * Column 2

Glasford Storage Field 2004 Withdrawals

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

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	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
2	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
3	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
4	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
5	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
6	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
7	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
8	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
9	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
10	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
11	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
12	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
13	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
14	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
15	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
16	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
17	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
18	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
19	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
20	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
21	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
22	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
23	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
24	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
25	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
26	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
27	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
28	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
29	XXXXXX		XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
30	XXXXXX		XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
31	XXXXXX		XXXXXX		XXXXXX		XXXXXX
Total	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX

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