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DATA REQUESTS

ENG 1.1 Is your company's gas system made up of one service territory or is it a number of smaller service territories that either do not border each other or which cannot share gas supplies? Please explain and describe each service territory (including number of customers in Illinois and total number of communities served within Illinois. This description should include maps of each service territories that show:

A) Company-owned or leased pipelines 4" and larger;
B) Interstate pipeline location;
C) Location of company-owned storage fields;
D) Location of any LPG or LNG facilities;
E) Location of connections with interstate pipeline companies and other LDCs; and
F) Location of connections for local (in-state) gas purchases.

RESPONSE: Mt. Carmel Public Utility Co. has one service territory that includes Wabash County and a small section of Lawrence County, a bordering county to the North. At 12/31/2010 our service territory had the following classifications of service:

Residential: 3,177

Commercial: 357

Communities served include the cities of Mt. Carmel, IL and St. Francisville, IL and the villages of Allendale, Bellmont, Cowling, Keensburg, Maud, and Patton. The Gas Map is attached as Exhibit A for your reference.
Mt. Carmel has no storage fields nor interconnects for local gas purchases.

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ENG 1.2 Provide a list and a description, including maximum daily gas flow, of each interconnection that each of your service territories had with your other service territories and with other gas utilities during the reconciliation period.

RESPONSE: The Company did not have any interconnections in our service territories with other gas utilities other than the tap on the Texas Eastern pipeline.

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ENG 1.3 List the gas volumes actually supplied (in dekatherms) to each of your service territories from each gas source (broken down by contract number for pipeline and individually for each leased and owned storage service) for the actual peak day of the reconciliation period. Explain any instances where available gas volumes were abnormally restricted. Also, explain why this mixture of supply resources was required to provide reliable service to customers at the lowest cost.

RESPONSE: During the reconciliation period, the Company purchased all required volumes from Atmos Energy Marketing, LLC. The gas volume supplied for the actual peak day in the reconciliation period, which was February 9, 2011was 3,725 DTHs.

There was no time when volumes were abnormally restricted

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ENG 1.4 State the volume of gas storage capability owned, contracted for, leased, etc. by your company during the reconciliation period.

A) State how much of the total available gas storage capacity was pipeline storage service, leased storage, and storage facilities owned by your company.

B) For each storage location or service, list the maximum daily deliverability and the expected daily deliverability on a typical peak day.

C) For each location or service, provide any injection limitations such as time of year constraints, source of injection gas, etc.

D) Explain how your company determined that the available gas storage was the proper amount needed to ensure reliable service to customers at the lowest cost during the reconciliation period.

E) Provide a description of all applicable costs for each leased storage agreement and list the level of those costs (i.e. gas cost, transportation cost, injection/withdrawal cost etc.).

F) Provide an explanation of the type of transportation used in conjunction with each leased storage agreement (i.e. is firm transportation necessary for injections, are separate transportation agreements necessary to get withdrawals to city-gate).

G) Provide your company's planned injection and withdrawals levels for each storage facility listed in response to the above questions. If your company does not maintain a storage injection or withdrawal plan, then fully explain why not and explain how your company decides when to conduct its storage injections and withdrawals.

RESPONSE: The Company does not have any gas capability owned, contracted for, leased during the reconciliation period.

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ENG 1.5 Referring to your Company's response to Staff data request ENG 1.4, provide the daily withdrawal and injection levels for each storage service and/or facility noted for each month of the review period. If injections were made during the winter months (or withdrawals during the summer months), please explain. **Please provide this information in hardcopy and in Excel spreadsheet format.**

RESPONSE: Not Applicable.

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ENG 1.6 For all propane or LNG facilities, please indicate how quickly, or at what rate, the propane/LNG inventory can be replenished during the winter months? If the replenishment rate changes with the amount of supply in inventory then explain how the rate will change for the different levels of inventory.

RESPONSE: The Company does not have any propane or LNG facilities.

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ENG 1.7 Provide the last three dates in which the propane and/or LNG facility was required to serve load (other than for testing) on your system. Explain the situation that caused each of these three occurrences and how much load was served by the facility.

RESPONSE: **Not Applicable.**

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ENG 1.8 For each individual propane and LNG facility, provide the year end volume and book value for the reconciliation period and the two previous years. If the inventory is valued in layers, provide the volume and value of each individual layer for each year.

RESPONSE: Not Applicable.

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ENG 1.9 Did your Company experience any capacity restrictions with any Company owned facility (transmission, distribution, storage, LNG, LPG, etc.) during the reconciliation period that lasted longer than 24 hours (i.e. problems with a well at a storage field that limited that field's injection or withdrawal ability). If yes, then provide the following:

A) A description of the cause of the restriction;
B) How the restriction impacted your Company (quantify restriction);
C) Date that the restriction occurred;
D) Date that the restriction was resolved
E) A description of how the restriction was resolved; and
F) A copy of any studies (internal and external) that reviewed the cause of the restriction.

RESPONSE: No capacity restrictions were experienced during the reconciliation period.

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ENG 1.10 How frequently does your company test the operation of its propane or LNG facilities? Fully describe what is done during these tests and note what, if anything needed repaired at each facility during the reconciliation period.

RESPONSE: Not Applicable

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ENG 1.11 How frequently does your company physically test or verify through reservoir engineering calculations the peak day and annual deliverability of each Company owned storage field? Fully describe what is done to verify peak day and annual deliverability for each Company owned storage field, and what, if anything, the Company has done or needs to do to maintain or restore the storage field's deliverability.

RESPONSE: Not Applicable.

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ENG 1.12 Provide copies of all studies or reports associated with the activities discussed in the Company's responses to Staff data requests ENG 1.10 and 1.11.

RESPONSE: **Not Applicable.**

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ENG 1.13 Provide the monthly peak day gas sendout for your entire gas system and for each of the service territories during the reconciliation period. Provide the dates for these peak days. If the peak day for each territory is not the same as the peak day for the entire system, then provide the sendout for each service territory on the system peak day.

Month	Peak Day	Volume in Dthms
January	21	3,865
February	9	3,725
March	10	2,101
April	16	1,116
May	2	875
June	14	166
July	5	152
August	28	161
September	27	354
October	20	1,115
November	29	1,984
December	10	2,303

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ENG 1.14 Did your company curtail service to any of its firm customers during the reconciliation period? If yes, state the number of customers curtailed by tariff, the date of the curtailment, an estimate of how much gas was not delivered, and the reason for the curtailment.

RESPONSE: No service was curtailed during the reconciliation period.

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ENG 1.15 Did your company take any unauthorized use gas from any pipeline and incur associated overrun (or similar) charges during the reconciliation period? If yes, then state the amount of overrun gas taken and the level of overrun charges for each occurrence, explain the cause of each occurrence, provide the date of each occurrence, and state the name of the service territories that received overrun gas from each occurrence.

RESPONSE: No unauthorized use gas was taken

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ENG 1.16 Provide the annual quantity of unaccounted for gas, in percent, based on your company's total sendout for the reconciliation period. Also, provide the unaccounted for value your company provided to the Department of Transportation for the period July 1, 2010 through June 30, 2011. Finally, provide the monthly unaccounted for gas percentage used by your company to adjust your customers' usage amounts during the reconciliation period as well as an explanation for how those values are calculated. If any of the values provided is greater than 3%, provide an explanation. Also, provide your company's unaccounted for gas level for the prior two periods using the same definitions as asked above. If the unaccounted for gas level shows an increasing trend, then describe what actions your company has taken to reduce or account for the increasing levels of unaccounted for gas.

RESPONSE:

Unaccounted For Gas	12 months ending JUNE 30 As reported to DOT	12 months ending DECEMBER 31 Co. Unaccounted for
2009	(.23%)	(1.83%)
2010	.24%	2.53%
2011	(.22%)	(0)

The Company does not adjust Customer's usage amounts for unaccounted for gas.

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ENG 1.17 Explain the gas load forecasting methods used by your company to determine daily, short-term, long-term, and peak demand load requirements were determined during the reconciliation period. Provide all assumptions used for determining long-term and peak load values and your company's basis for those assumptions.

RESPONSE: Both the Company and the Company's gas provider (Atmos Energy Marketing) maintain historical data regarding consumption patterns. Using delivery levels for the prior seven years, Atmos proposes a daily delivery amount by eliminating the 7 year high and the 7 year low and then averaging the remaining 5 years to come up with an estimated schedule. That amount is compared to the Company 7 year average and is adjusted (or not) following a comparison and subsequent discussion.

Under the terms of the contract, Atmos acts as agent for the Company for the purpose of nominating and scheduling gas deliveries on a daily basis.

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ENG 1.18 Explain how your company planned its mix of purchases to help ensure that your company would not experience shortages or be oversupplied during the reconciliation period. Also, explain how this mix of purchases ensured that reliable gas service would be supplied to customers at the lowest cost during the reconciliation period.

RESPONSE: During the reconciliation period, the Company purchased all of the required gas supply from Atmos under a full requirements contract, thereby ensuring reliable supply.

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ENG 1.19 For each service territory during the reconciliation period, provide the forecasted peak design day, the estimated amount of available peak day supply (broken down by pipeline and individually for each leased and owned storage service), and the reserve margin used to serve your customers' peak demand needs. Also, list and explain all criteria used by your company as a basis for each of these values. Provide any work papers, reports, studies, or analyses that were used by your company to apply these criteria to the reconciliation period. If none of these documents are supplied, explain why not.

RESPONSE: The Company estimates the maximum allowable natural gas pipeline to be 7,711 Mcf/d, or 7,780 Dthms/d. The pipeline was built and put into service 1960-1961. The original design took into consideration an estimated consumption based upon existing customer loads as well as additional requests for gas service and the associated usage estimated for those applicants.

The pipeline as it is structured could accommodate a peak design day which required 7,614 DTHMs. Based on current consumption patterns, that would be an 115 degree day or -50°.

Historical local weather patterns indicate that a more reasonable maximum low temperature for our service territory would be -33°, which is a 98 degree day. Based on a peak design day of -33°/98 degree day, 4,727DTH would be required; well within the capacity of the pipeline to accommodate. The Company believes it has a 40% reserve margin and is comfortable with the existing capacity to provide adequate gas flow.

Please see Exhibit B below for the analysis of the reserve margin during the reconciliation period.

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ENG 1.20 Explain how often after the fact evaluations and audits are conducted by your company on its purchasing and contracting decisions. Provide a copy of all documents pertaining to these evaluations. Identify any decisions, recommendations, policy changes, and new procedures that have resulted from these evaluations.

A) Provide the date when the latest after the fact evaluations were conducted and provide copies of those reports.

B) Provide the date when the latest audits were conducted and provide copies of the latest audit reports.

C) List and explain any changes or modifications made to these functions as a result of the latest after the fact evaluation or audits.

RESPONSE: The Company has purchased its gas supply from Atmos Energy Marketing and their predecessor since 1992 under an “evergreen” contract following the expiration of the original contract in 2002.

While the Company was satisfied with the pricing and services it received, it was determined that a Request for Proposal (RFP) should be issued for gas supply beginning April 1, 2011. This date was chosen because the final forward purchase contract in place at that time had an end flow date was April 1, 2011.

Six suppliers responded to the RFP with various pricing and service options. Following an analysis of the proposals, a two year full requirements contract was awarded to Atmos Energy Marketing to begin April 1, 2011 and ending March 31, 2013.

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ENG 1.21 Explain all written procedures for purchasing and contracting that were in effect during the reconciliation period or that were in effect when past purchases and contracts were made that extended into the reconciliation period. Provide a copy of these written procedures.

RESPONSE: The Board of Directors authorized the President of the Company to make purchasing decisions for the supply of gas required by the Company. A Gas Purchasing Policy was developed and approved by the Company Board of Directors at the December, 2010 monthly meeting.

The Board of Directors approved the hiring of an outside consultant to manage the RFP process for gas supply. Following an analysis of the responses a recommendation was made and approved by the Board of Directors at the meeting held January 7, 2011.

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ENG 1.22 Provide the date of the most recent general management review of purchasing and contracting procedures. Provide a copy of all documents pertaining to these evaluations. Identify any decisions, recommendations, policy changes, and new procedures that have resulted from these evaluations.

RESPONSE: The policy approved by the Board of Directors in December 2010.

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Natural Gas Purchasing Policy
Of
MT. CARMEL PUBLIC UTILITY CO.

It is the desire of Mt. Carmel Public Utility Co. (the Company) to develop a natural gas purchasing policy that will result in the pursuit of low cost natural gas and to attempt to level out seasonal price volatilities. To accomplish this result, the Company has developed a systematic approach to purchasing forward contracts for gas supply. The purpose of securing firm prices for portions of our future natural gas purchases is to reduce the risk of substantial upward surges in natural gas pricing, thereby limiting the effect on overall costs of purchased gas on our customers. The cost of the gas delivered for customer use is recovered through the Purchased Gas Allowance (PGA)

First, the Company will issue a Natural Gas Supply RFP on a bi-annual basis to survey the existing suppliers and to determine prudent terms available for purchasing and settling natural gas for customer's ultimate consumption. Following the completion of the RFP Process, a program of limited systematic forward gas purchasing will be initiated as described below.

Because price volatility exists in the gas market with many factors affecting the volatility at any one time, the Company believes the prudent approach to providing stability in price is to evaluate hedge forward prices in an established range. The range will be to fix the price from 0% hedged up to and no more than 50% of the estimated gas consumption which is based on the average consumption for any given month over the previous 5 years. Actual monthly balancing will be subsidized with the purchase of natural gas linked to the index price for the amounts actually used.

A disciplined approach of layering in volumes of gas at different times is designed to minimize price volatility because volumes of gas are purchased and layered without the utility (and ultimately the customer) being subjected to the risk associated with peak price spikes. Further, targeted purchase ranges will allow enough flexibility to avoid emotional markets and to purchase supply during more rational time periods.

No single factor will solely influence the decision to purchase or refrain from purchasing forward natural gas contracts. Factors that will be monitored on an ongoing basis include market sentiment, storage data, weather forecast data, hurricane seasonal forecast data, daily volatility, trading liquidity and developing natural gas trends.

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ENG 1.23 Provide the date when the purchasing and contracting procedures were most recently changed and explain why the changes were made.

RESPONSE: Purchasing decisions have historically been made by the President as empowered by the Board of Directors.

Previous to adopting the policy referenced in ENG 1.22, the Company had developed a purchasing strategy with the gas supplier. The strategy was to layer in a small percentage of estimated gas supply at various times to level out prices. This strategy was implemented during a period of volatile natural gas prices when forecast models were predicting escalating prices. The idea was to “dollar cost average” purchases.

With the change in natural gas pricing, and following management discussion regarding the purchase strategy, the policy referenced in ENG 1.22 was drafted and approved in December, 2010. It was determined to issue the RFP and to explore the pricing strategies available to the Company from a variety of suppliers.

The policy allows for purchasing 0%-50% of estimated gas supply, depending on demand and other market conditions.

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ENG 1.24 Explain the procedures used to verify the quality and quantity of gas and propane delivered to your company's system during the reconciliation period. How did the procedures ensure that your company always received the quantity and quality for which it paid?

RESPONSE: The Company does not purchase propane.

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ENG 1.25 Explain how (meter type, size or capacity) the volume of gas delivered at each of your company's take points is measured (if not metered then explain how gas volume is measured) and provide the following information for each take point:

A) The frequency that your company is allowed to check the accuracy of the device;

B) The accuracy limits allowed on these devices (i.e. accurate to within +/- .1%) before the devices must be adjusted;

C) The frequency that your company checked these devices during the reconciliation period;

D) The results of your company's review of these measurement device (i.e. correction to bill, meter adjusted, meter accuracy met requirements, etc.); and

E) Owner of the measurement device.

RESPONSE: **The three wholesale customers taking gas from the City of Grayville tap on the Texas Eastern Transmission Co's take point south of Grayville own their individual turbine meters for the allocation of gas received at the Grayville tap, which is measured by TETCO's orifice meter. The City of Grayville is responsible for ensuring the accuracy of the TETCO value, and employs a consultant to review accuracy, and to allocate imbalances between the sum of the three meters' reported volumes and the quantity reported by TETCO.**
TETCO

A) By tariff, the TETCO meter may be calibrated monthly. The orifice is changed each spring and fall. By agreement, the three entities taking gas at Grayville request calibration each spring and fall.

B) TETCO will adjust billings whenever tests show more than a +/- 1.0% error. If a given meter is found to be more than 1% off, its readings are corrected by the degree of error back to half the time since the prior calibration.

C) Company personnel check the meters at least one time per month.

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D) The net reconciliation for calendar 2010 was -3,444 Dthms out of 345,169 gross received, or less than .1% margin of error, which is within tolerance.

E) Mt Carmel owns its meter, as do the City of Grayville and Consumers Gas Company respectively own theirs.

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ENG 1.26 Explain how (meter type, size or capacity) the volume of gas delivered to and from each of your company's storage fields, LNG, and LP facilities are measured and provide the following information by facility for each meter:

A) The frequency that your company checked the accuracy of the device during the reconciliation period;

B) The Company's standards for the accuracy limits allowed on these devices (i.e. accurate to within +/- .1%) before the devices must be adjusted; and

C) The results of your company's review of these measurement devices (i.e. correction to bill, meter adjusted, meter accuracy met requirements, etc.).

RESPONSE: The Company does not have storage fields, LNG or LP facilities.

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ENG 1.27 Identify all procedures used by your company to ensure that every reasonable effort was made to contact all available sources of suitable gas, gas storage, and propane before a new contract was awarded to a supplier during the reconciliation period. Describe all related actions taken by your company before any new contracts were awarded during the reconciliation period.

RESPONSE: The Company used the services of an outside consultant to develop a Request for Proposal that was distributed to gas suppliers. The RFP described the Company and the size and type of customer the Company services. In addition, a monthly estimated send out was described for potential suppliers. Suppliers were asked to respond within a prescribed time frame.

Following an analysis of the proposals provided, a recommendation was made and a two year contract was executed.

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ENG 1.28 Provide a listing, by interstate pipeline, of all pipeline transportation and storage capacity reserved by your company. For each item of capacity listed, include the name of the pipeline providing the capacity; the amount of capacity; the contract number, any special conditions associated with the capacity; and the cost of reserving and utilizing the capacity, with details of the various cost components involved. If the transportation contracts or leased storage contracts are linked (i.e. transportation contract A used with leased storage contract A or transportation contract A is used in conjunction with portion of transportation contract B and C (steps 1 and 2 of transportation chain)) provide an explanation for which contracts are used in conjunction with each other. Finally, provide the dates for which each of those agreements is in effect.

RESPONSE: Texas Eastern Transmission Co.: 5,214 Dthms/day maximum on SCT-1 contract.

Reservation Demand Charge	.003/Dthm/day	$15.64

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ENG 1.29 Provide the information requested in ENG 1.28 for the prior reconciliation period.

RESPONSE: Texas Eastern Transmission Co.: 5,214 Dthms/day maximum on SCT-1 contract.

	Rate	
5,214	**.003**	**$15.64**

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ENG 1.30 Provide a listing of all pipeline and storage capacity from non-interstate pipelines your company has reserved. For each item of capacity listed, include the name of the entity providing the capacity; the amount of capacity; any special conditions associated with the capacity; and the cost of reserving and utilizing the capacity, with details of the various cost components involved. If the transportation contracts or leased storage contracts are linked (i.e. transportation contract A used with leased storage contract A or transportation contract A is used in conjunction with portion of transportation contract B and C (steps 1 and 2 of transportation chain)) provide an explanation for which contracts are used in conjunction with each other. Finally, provide the dates for which each of those agreements is in effect.

RESPONSE: Not Applicable.

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ENG 1.31 Explain how your company made use of off-system transactions during the reconciliation period. Include a listing of each transaction broken down by transaction groups on a monthly basis (i.e. all capacity release transactions listed together). For each transaction, include the name of the pipeline(s) providing the capacity; whether your company is releasing the capacity or accepting capacity that is released by another company; the amount of capacity that was involved; any special conditions associated with the transaction (e.g.: released subject to recall); and the revenues, costs and margins involved in the transaction. If multiple rates are used, list them and show their contribution to the total revenues or total costs involved in the transaction. **If transaction involved an affiliated interest, note those transactions and explain how your company ensured preferential treatment was not provided to its affiliate.** Also, provide a definition, including examples, of each transaction group.

RESPONSE: No off system transactions occurred.

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ENG 1.32 Explain how your company made use of off-system sales of gas originally purchased for use by your company's customers during the reconciliation period. Include a listing of each transaction broken down by groups on a monthly basis. The listing should include name of the entity purchasing the gas, the amount of supply involved; any special conditions associated with the transaction; and the revenues, costs and margins involved in the transaction. If multiple rates are used, list them and show their contribution to the total revenues or total costs involved in the transaction. **If the sale involved an affiliated interest, note those sales and explain how your company ensured preferential treatment was not provided to its affiliate.** Also, provide a definition, including examples, of each sales group.

RESPONSE: No off system sales transactions occurred.

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ENG 1.33 List every transportation transaction conducted under FERC tariffs for the reconciliation period. These transactions shall include, but not be limited to, all off-system sales, exchanges, parking services, storage services, and loan agreements. For each transaction identified, provide the name of the other party or parties, the supply or asset loaned, sold, or released, the type of transaction, the volume, the value of the supply or asset, the amount of compensation received, the date(s) the transaction occurred, and whether the revenue was flowed through the PGA. **Please provide this information in hardcopy and in Excel spreadsheet format.**

RESPONSE: None.

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ENG 1.34 List every storage transaction conducted under FERC tariffs for the reconciliation period. These transactions shall include, but not be limited to, all off-system sales, exchanges, parking services, storage services, and loan agreements. For each transaction identified, provide the name of the other party or parties, the supply or asset loaned, sold, or released, the type of transaction, the volume, the value of the supply or asset, the amount of compensation received, the date(s) the transaction occurred, and whether the revenue was flowed through the PGA. **Please provide this information in hardcopy and in Excel spreadsheet format.**

RESPONSE: None.

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ENG 1.35 List any other transactions that conducted under FERC tariffs for the reconciliation period that was not provided in response to ENG 1.33 or 1.34. These transactions shall include, but not be limited to, all off-system sales, exchanges, parking services, storage services, and loan agreements. For each transaction identified, provide the name of the other party or parties, the supply or asset loaned, sold, or released, the type of transaction, the volume, the value of the supply or asset, the amount of compensation received, the date(s) the transaction occurred, and whether the revenue was flowed through the PGA. **Please provide this information in hardcopy and in Excel spreadsheet format.**

RESPONSE: None.

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ENG 1.36 List every transaction conducted during the reconciliation period that did not flow through the PGA and was not conducted under FERC tariffs. These transactions shall include, but not be limited to, all off-system sales, exchanges, parking services, storage services, and loan agreements. For each transaction identified provide the name of the other party or parties, the supply or asset loaned, sold, or released, the type of transaction, the volume, the value of the supply or asset, the amount of compensation received, and the date(s) the transaction occurred. **Please provide this information in hardcopy and in Excel spreadsheet format.**

RESPONSE: None.

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ENG 1.37 For all transactions in ENG 1.33 through 1.36 where the Company did not flow the transaction through the PGA fully explain why the Company believes that it is not required to pass all of the revenue through the PGA. Provide all relevant documents and references to Administrative Rules, Orders, or other communications with the ICC that support these beliefs.

RESPONSE: Not Applicable.

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ENG 1.38 Provide a description of your company's policies regarding its use of the off-system transaction and sales market. This description, at a minimum, should provide a brief overview of the activity, the type of transactions involved and copies of the procedures used when determining when to enter into these sorts of transactions.

RESPONSE: There is no policy regarding off system sales because the Company does not engage in that practice and does not have any activity to report.

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ENG 1.39 If your company has entered into any financial or physical contracts other than supply contracts indexed to a market price, provide all of the information necessary to evaluate the contracts as part of the overall gas cost portfolio. Relevant information may include but is not limited to: contract type, number of each type of contract, underlying volumes, dates on which contracts were purchased, sold, exercised, liquidated, and/or converted; prices at the time contracts were purchased, sold, exercised, liquidated, and/or converted, bid/ask spreads, strike prices, settlement prices, payouts, premiums, and transaction fees. If individual contract information was provided previously to the Engineering Department, it is not necessary to send it again. However, a summary of the contract information (contract name, term, and price) as well as information and/or discussions necessary to determine how the Company selected those contracts is still necessary. (added a request for the summary information)

RESPONSE: The Company had supply contracts that were purchased in previous reconciliation periods but were for gas supplied in 2011 as follows:

Contract Date	Volume	Price	Month
12/16/2008	5,100	8.04	Jan 2011
12/16/2008	4,000	8.04	Feb 2011
12/16/2008	2,500	8.04	Mar 2011
07/08/2010	9,300	5.19	Jan 2011
07/08/2010	7,200	5.19	Feb 2011
07/08/2010	4,800	5.19	Mar 2011
08/17/2010	4,400	4.84	Jan 2011
08/17/2010	3,800	4.84	Feb 2011
08/17/2010	2,300	4.84	Mar 2011
08/26/2010	9,300	4.48	Jan 2011

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08/26/2010	7,200	4.48	Feb 2011
08/26/2010	4,800	4.48	Mar 2011

During the Reconciliation Period, the following volumes were contracted:

Contract Date	Volume	Price	Month
June 24 2011	2,100	4.73	Oct 2011
June 24 2011	4,200	4.73	Nov 2011
June 24 2011	8,200	4.73	Dec 2011
June 24 2011	10,000	4.73	Jan 2012
June 24 2011	7,500	4.73	Feb 2012
June 24 2011	4,800	4.73	Mar 2012
June 24 2011	2,100	4.73	April 2012
Aug 12 2011	2,100	4.60	Oct 2011
Aug 12 2011	4,200	4.60	Nov 2011
Aug 12 2011	8,200	4.60	Dec 2011
Aug 12 2011	10,000	4.60	Jan 2012
Aug 12 2011	7,500	4.60	Feb 2012
Aug 12 2011	4,800	4.60	Mar 2012
Aug 12 2011	2,100	4.60	Apr 2012
Oct 7 2011	8,600	4.05	Dec 2011
Oct 7 2011	10,000	4.05	Jan 2012

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Oct 7 2011	7,500	4.05	Feb 2012
Oct 7 2011	4,800	4.05	Mar 2012
Oct 7 2011	2,100	4.05	April 2012

In 2008, natural gas prices were forecast to continue to rise with seasonal demand related price upticks. In retrospect, the opposite has taken place, but the decisions were made with the most reliable data available at that time. With prices continuing to remain low due to large supply, improved transportation, weak winter demand and high storage levels, no additional gas has been contracted at present.

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ENG 1.40 Provide all reports, memorandums, summaries, workpapers and/or other documents pertaining to any hedging programs or strategies utilized by your company.

RESPONSE: In making a determination as to the volumes of natural gas to hedge, a number of sources are studied. Mr. Barnhard monitors the commodity markets on a daily basis and also studies weather and oceanographic data. These information sources are web based applications and are not printed. He also closely monitors closing prices at month end, observing them for trends.

Beginning in November, 2011, Mr. Barnhard stepped down as President and the responsibility for monitoring gas prices was transferred to me. I check the natural gas markets multiple times per week, as well as closely monitoring closing prices. I also read periodicals for information relating to the NG market and trends. A copy is included as Exhibit C.

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ENG 1.41 Explain, in as much detail as possible, any hedging programs or strategies utilized by your company. What signal(s) or decision rule(s) did your company rely upon to enter into the contracts included in the response to data request number ENG 1.39? Provide any analyses the signals or decision rules employed by your company. Provide copies of all invoices and receipts supporting hedging activity.

RESPONSE: Following entering into the 2 year contract with Atmos Energy Marketing for gas supply, smaller percentages of gas were hedged than in the past.

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ENG 1.42 If any costs or credits flowed through the PGA are attributable to transactions between your company and its affiliates, explain why each affiliate transaction was superior to all available alternatives and provide documentation demonstrating that the affiliate transactions were in the best interests of ratepayers.

RESPONSE: There were no affiliate transactions. The Company does not have any affiliates.

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ENG 1.43 Does your company diversify its supply portfolio by entering into a combination of fixed and market priced supply contracts? If no, explain why not. If yes, then provide a breakdown (by maximum daily volume) between fixed and market priced contracts and explain how those relative levels were selected to ensure low cost gas suppliers for your company's customers.

RESPONSE: The Company diversifies its supply portfolio to the extent described in previous responses, in an attempt to soften the affect of seasonal price increases.

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ENG 1.44 List each **firm** purchase contract and propane purchase contract from which your company was eligible to receive service during the reconciliation period. Provide the following details for each agreement in spreadsheet format, with one contract per row:

A) Supplier: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

B) Effective date: xxxxxxxxxxxxx

C) Termination date: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

D) Provisions for extension: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

E) Provisions for termination: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

F) Provisions for renegotiation of terms: xxxxxxxxxxxxxxxxxxxxxxxxxxx

G) Contract type (swing, base load, etc.): xxxxxxxxxxxxxxxxxxxxxxxxxx

H) Any affiliation between the supplier and your utility: xxxxxxxx

I) Supplier's location (metering points, pipeline names, etc.): xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

J) Contract quantities (daily limits, monthly entitlements, etc.): xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

K) Gas commodity cost (per unit): xxxxxxxxxxxxxxxxxxxxxxxxxxx

L) Transportation cost (per unit): xxxxxxxxxxxxxxxxxxxxxxxxxxx

M) Demand charges (per unit): xxxxxxxxxxxxxxxxxxxxxxxxxx

N) Any stated minimum and maximum purchase quantity limits: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

O) Nomination times for all listed swing contracts; xxxxxxxxx

P) Overrun provisions: **xxxxxxxxx.** and

Q) The dates during the reconciliation period when the supplier has requested and your utility has approved a price change of any kind, along with an explanation of how your utility determined that a price change was appropriate.
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

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ENG 1.45 For all contracts listed in response to ENG 1.44, list the suppliers that failed to deliver gas to your company as provided under the contract. Specify the circumstances under which these suppliers failed to make deliveries of the contracted gas, the date(s) upon which the failed deliveries occurred and what actions, if any, taken against that supplier for its failure?

RESPONSE: None

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ENG 1.46 For each new or renegotiated firm supply, transportation, or storage contract entered into or effective during the reconciliation period, provide the analysis used to choose that contract. Show the all the bids received and indicate which bids were chosen. If the final contract is different than the bid price or quantity, indicate this information in a footnote. Also, explain the methodology used to determine that the selected contract was the best supply contract available to your Company at that time (ex. how is reliability of supply versus low cost taken into account, number of other suppliers and options considered, etc.).

RESPONSE: RESPONSE: A copy of the RFP, Summary of bids, and Evaluation Notes are provided in Exhibit D

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ENG 1.47 Explain all reasons why your company believes that any lower priced alternative source identified in staff data request ENG 1.44 is inferior or less desirable than the contract in effect during the reconciliation period.

RESPONSE: No lower priced alternative source was identified.

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ENG 1.48 How many entities does your company contact when obtaining bids for its firm and spot gas purchases. Also, if your company purchases propane, identify the number of entities contacted for those purchases.

RESPONSE: During the RFP process, the Company solicited bids from nine providers and received bids from six different suppliers for natural gas supply.

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ENG 1.49 Provide a monthly summary of the gas, gas storage (withdrawals and injections), and propane quantities purchased and their price ($/DTH) from each different supplier, storage field, or any other supply source during the reconciliation period. If your company has more than one contract with a specific supplier, then provide the breakdown by contract.

Supplier: Atmos Energy Marketing

2011	Volume
January	78,317
February	53,722
March	38,777
April	14,475
May	9,676
June	4,316
July	3,650
August	4,134
September	6,034
October	15,051
November	28,949
December	48,792

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ENG 1.50 Provide a breakdown of the volume of gas purchased during the reconciliation period between index priced contracts, fixed price contracts and hedged contracts.

RESPONSE: See Exhibit E.

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ENG 1.51 Explain how your company monitored the spot market for gas during the reconciliation period.

RESPONSE: The Company President monitors spot prices on a daily basis via the internet. In addition, Atmos Energy Marketing provides the Company with month end closing prices by e-mail.

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ENG 1.52 Explain any constraints that prevented your company from participating in the spot market for gas supplies to the full extent that your company would have participated during the reconciliation period if the constraint had not existed. Include, but do not limit this explanation to, contracted gas oversupply situations, transportation limitations, and other physical or economic limitations of supply system components. Explain all possible remedies for these constraints. Explain what actions your company has taken to remove these constraints and what actions your company plans to take.

RESPONSE: The size of the Company makes it impractical, from a staffing perspective as well as with respect to the volume of gas purchased, to participate in a spot market purchasing program.

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ENG 1.53 Provide a detailed listing of all gas suppliers, including company owned sources (and their associated volumes) that served your company on January 13, March 12, May 15, July 20, October 7, and December 21 during the reconciliation period. For suppliers providing service under more than one contract, provide the listing for each contract. For each of the suppliers listed on the requested days, provide the average daily cost (variable) of each of the supplies used on that day (include all relevant variable charges including transportation). To the extent possible, explain why the particular supply sources where being used on those days and how the Company selected the level of supply from those sources. Finally, indicate for each listed supplier whether the gas purchased was from a firm or spot contract.

RESPONSE:

Commodity: Atmos Energy Marketing, LLC

Local Transportation: City of Grayville

Interstate Transportation: Spectra Energy

Date	Dths	Atmos	Spectra	Grayville	Total
January 27	2,350	$13,611	.03	$259	$39,870
March 2	2,242	$12,331	.03	$247	$12,578
July 9	121	$636	.03	$13	$649
October 17	994	$4,860	.03	$109	$4,970
December 9	2,406	$11,669	.03	$265	$11,934

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ENG 1.54 Provide a monthly listing that shows the supplier, volume and price paid for all local gas purchased during the reconciliation period. Also, provide a description of how frequently this gas is tested to ensure compliance with 83 Illinois Administrative Code Part 530 and how this gas is metered. Finally, provide all copies of tests completed that ensured the quality of this gas met Commission requirements.

RESPONSE: There was no local gas purchased during the reconciliation period.