



Law Offices

# Quinn, Johnston, Henderson & Pretorius

Chartered

Telephone: (217) 753-1133  
Fax: (217) 753-1180

205 South Fifth Street  
Suite 900  
Springfield, Illinois 62701

email: quinnlaw@qjhp.com  
Website: http://www.qjhp.com

ILLINOIS  
COMMERCE  
COMMISSION

2003 SEP -4 A 11: 56

CHIEF CLERK'S OFFICE

September 3, 2003

R. Michael Henderson  
Murvel Pretorius, Jr.  
Bradley W. Dunham  
Robert H. Jennetten  
Gregory A. Cerulo  
Paul P. Gilfillan  
Lauric M. Judd  
Stanley L. Morris  
James A. Borland  
David B. Collins  
John F. Kamin  
Michael J. Holt  
Matthew B. Smith  
Peter R. Jennetten  
Michael A. Kraft  
Matthew J. Maddox  
Jonathan A. Stump

Clerk  
Illinois Commerce Commission  
527 East Capitol  
Springfield, IL 62701

RE: Consumer Gas Company  
Docket No. 02-0719  
Our File No: 102 251 018

Laura A. Petersen  
Jo T. Wetherill  
John D. Moses  
John A. Wolters  
Allison N. Bell  
Adam P. Chaddock

of Counsel  
W. Thomas Johnston

Lowell R. McConnell  
(1911-1971)  
Golden A. McConnell  
(1914-1974)  
Joseph A. Leimkuehler  
(1931-1974)  
Thomas B. Kennedy, Sr.  
(1912-1988)  
William C. Nicol  
(1911-1996)  
John C. Newell, Jr.  
(1915-1996)  
Richard E. Quinn  
(1928-2000)

Dear Sir or Madam:

Attached for filing is Company late filed Exhibit 5 which consists of Company responses to the following "Eng" Data Requests: 2.1-2.7, 2.9, 2.11-2.18, 2.20-2.21, 2.25-2.32, 2.35-2.41, 2.43-2.45, 2.48-2.50 and 2.52.

We also attach a original and three copies of a Proposed Order for usage in this docket.

Very truly yours,

QUINN, JOHNSTON, HENDERSON & PRETORIUS

By:

Stanley L. Morris

SLM/pm  
Attachments

Copy w/Proposed Order to:

Larry Jones  
Theresa Ebrey  
Eric Lounsberry  
C.A. Robinson

Peoria Office  
227 N.E. Jefferson Street  
Peoria, Illinois 61602  
Telephone: (309) 674-1133  
Fax: (309) 674-6503

ICC DOCK. #02-0719  
CONSUMERS GAS COMPANY  
C. A. ROBINSON, PRESIDENT  
(812) 477-9030  
e-mail: [consumersgasco@yahoo.com](mailto:consumersgasco@yahoo.com)

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2003 SEP -4 A 11: 19  
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THE GAS SYSTEM

ENG 2.1 Is your utility's gas system made up on 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:

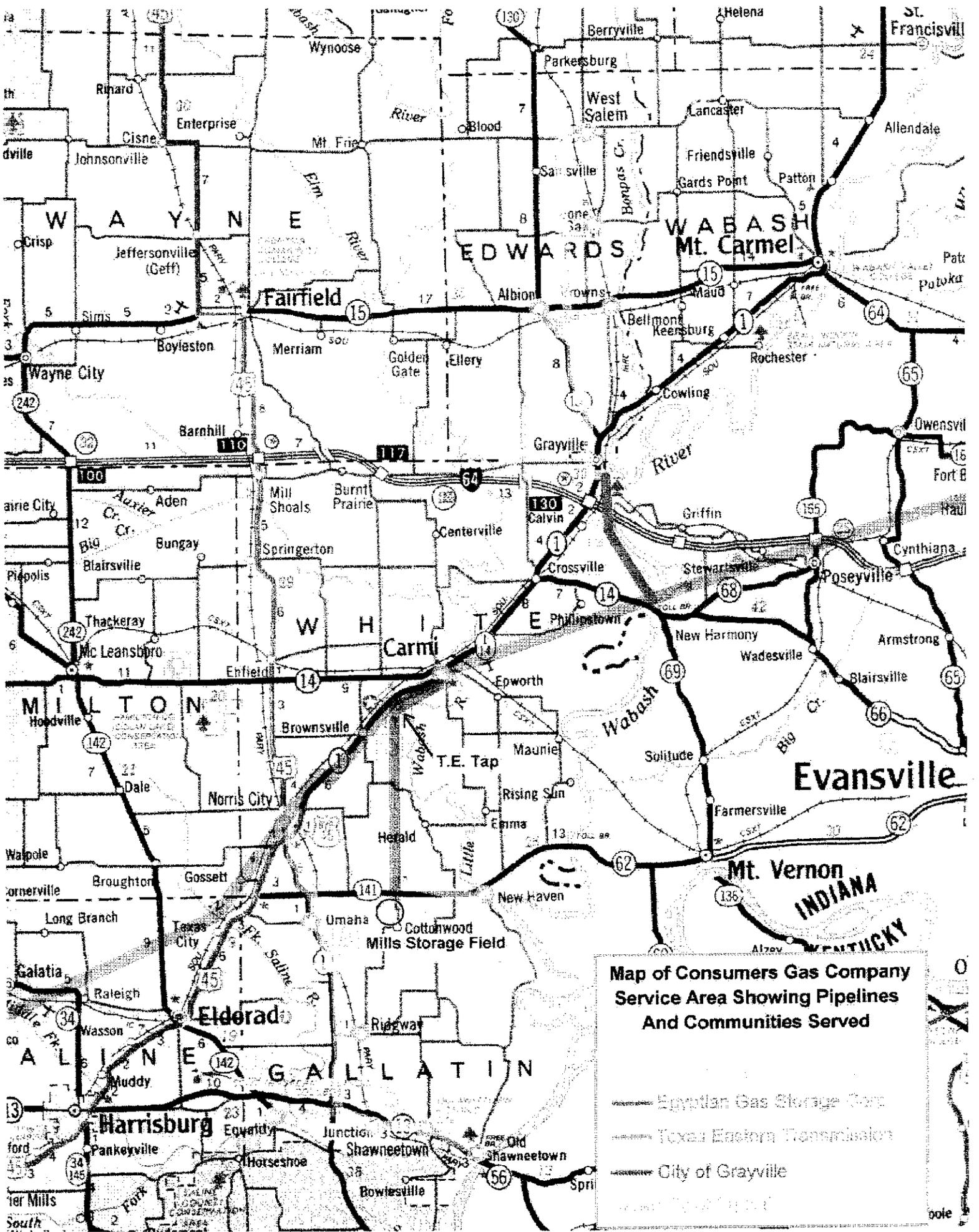
- A) Utility-owned or leased pipelines 4" and larger;
- B) Interstate pipeline location;
- C) Location of utility-owned storage fields;
- D) Location of any LPG or LNG facilities;
- E) Location of connections with interstate pipeline companies and other LDCs;  
and
- F) Location of connections for local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

Consumers Gas Company's system is divided into three (3) service areas:

**CARMI** - serving the city of Carmi: **RIDGWAY** - serving Ridgway, Junction, New Haven, Omaha, Old Shawneetown, Brownsville and also selling gas to New Shawneetown and the Village of Equality Municipal Gas Systems: **ALBION** - serving Albion, West Salem, Browns and Bone Gap. There is a separate TET tap in each service area.

- A. Utility-owned pipelines (Coded in blue)
- B. Interstate pipeline. (Coded in green)
- C. None
- D. None
- E. None
- F.

(See attached Map)



**Map of Consumers Gas Company Service Area Showing Pipelines And Communities Served**

- Egyptian Gas Storage Corp.
- Texas Eastern Transmission
- City of Grayville

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e-mail: [consumersgasco@yahoo.com](mailto:consumersgasco@yahoo.com)

### THE GAS SYSTEM

ENG 2.2 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.

None - Each of our service areas has a separate tap with TET. Our service areas are not interconnected and we are not interconnected with other gas utility.

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e-mail: [consumersgasco@yahoo.com](mailto:consumersgasco@yahoo.com)

### THE GAS SYSTEM

eng 2.3 Provide a list and description of all the pipeline take points that were active for each of your service territories during the reconciliation period.

Consumers has a meter tap with Texas Eastern Transmission at Carmi (sta.#89) - serving the City of Carmi: at Norris City (Omaha Sta. #937) - serving Ridgway, Junction, New Haven, Omaha, Old Shawneetown, Brownsville and the New Shawneetown and Equality Municipal Gas System: at Albion (Sta. #1018) - serving Albion, West Salem, Browns and Bone Gape. The meter tap for the Albion service area belongs to the City of Grayville, therefore we pay Grayville transportation charges for the volume of gas metered thru this take-point but are billed direct from Texas Eastern for the gas-volume usage.

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THE GAS SYSTEM

ENG 2.4 List the gas volumes actually supplied (in dekatherms) to each of your service territories from each gas source (broken down by 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.

	<u>DTH</u>	<u>%</u>
Carmi - Storage	1,518	19.93
Carmi - Woodward Mktg.	1,971	25.88
Albion - Woodward Mktg.	2,575	33.81
Omaha - Storage	324	4.25
Omaha - Woodward Mktg	<u>1,229</u>	<u>16.13</u>
	7,617	100.00

Peak day occurred on February 26, 2002

There were no instances where gas volumes were abnormally restricted during the reconciliation period.

The mixture of gas supply was used with the intentions of holding the reservation & demand charges to the lowest possible levels. By allocating storage gas during high demand periods Consumers can hold transportation charges down and also help hold gas costs down.

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### THE GAS SYSTEM

ENG 2.5 State the volume of gas storage capability owned, contracted for, leased, etc. by your utility 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 utility.
- 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 utility 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 utility's planned injection and withdrawals levels for each storage facility listed in response to the above questions. If your utility does not maintain a storage injection or withdrawal plan, then fully explain why not and explain how your utility decides when to conduct its storage injections and withdrawals.

Consumers Gas Company had contracted for 160,000 MCF per year storage with Egyptian Gas Storage Corp. Inc.

- A: All is leased storage from Egyptian Gas Storage.
- B: The leased contract is for 2,000 MCF per day with the exception of 2,000 MCF deliverability on a typical peak day.
- C: Injection limitations are from November 1 thru May 31.

- D: The amount of storage was determined by the Illinois Commerce Commission at our rate case hearing in 1989 and expanded in 1997 due to the addition of a 3" line from our Omaha gas line to the storage field.
- E: There is only one gas storage contract with the gas being stored coming from Woodward Marketing and transported by Texas Eastern Pipeline. Injection and withdrawal costs are explained in the attached gas storage agreement.
- F: See attached contract.
- G: As previously stated all injections are done during the months of June thru October and withdrawals are from November 1 thru May 31. Withdrawals are determined by index gas pricing and weather demands in an effort to help hold gas costs down for the consumer.

## GAS STORAGE CONTRACT

This Gas Storage Contract dated this 1st Day of June, 1998, by and between EGYPTIAN GAS STORAGE, INC., an Illinois Corporation (hereinafter called "Egyptian"), and CONSUMERS GAS COMPANY, an Illinois Corporation with an administrative office in Evansville, Indiana, (hereinafter called "Consumers") is for the storage of natural gas as follows:

### ITEM 1 - Storage Volume

Consumers shall store 160,000 DTH per year of natural gas with Egyptian in the Mills Storage Field located in Gallatin County, Illinois, subject to a plus or minus 5% variance.

### ITEM 2 - Storage Rates

The following sets forth appropriate rates and charges for such storage:

	<u>Quantity</u>	<u>Charge per</u> <u>Dth</u>
Contract Daily Demand Charge	2,000 Dth/d	\$2.50
Injection Charge	-----	.10
Withdrawal Charge	-----	.10
Space Reservation Charge	160,000 Dth	.025
Storage (Top Only)	-----	.01

The following sets forth appropriate rates and charges for transportation charges:

Contract Daily Demand Charge	300 DTH	\$2.50
Transportation Charge	---	.15/DTH

### ITEM 3 - Term

This Agreement shall extend for a period of five (5) year commencing on the 1st day of the month following the approval of the contract by the Illinois Commerce Commission and issuance of the proper order. At expiration of this five (5) year agreement an additional three (3) years upon approval by both parties is provided for.

### ITEM 4 - Shrinkage and Fuel

All gas stored on behalf of Consumers will be subject to a 2% shrinkage and fuel charge. All new gas injected by Consumers to replace withdrawals shall be subject to a 2% shrinkage and fuel charge, with the right to withdraw 100% of the amount of credited

storage. That is to say, Consumers will replace gas on the basis of 102% of the volumes required and will be entitled to withdraw 100% of those volumes.

#### **ITEM 5 - Billing Procedure**

Consumers will be billed monthly on or before the fifteenth (15th) day of each calendar month for the previous month and based upon the volumes of storage gas on hand as of the first day of the month in which such billing is rendered. Payment to Egyptian will be paid by Consumers on or before ten (10) days thereafter, i.e. the twenty-fifth (25th) day of the calendar month. Monthly reports showing gas on hand in storage and a record of all withdrawals and or injections during the preceding calendar month shall be furnished to Consumers, together with the monthly billing statements.

#### **ITEM 6 - Injection and Withdrawal**

Unless otherwise agreed between the parties in writing in advance, during the months of May through September of any calendar year, Consumers will have the right to inject natural gas and during the months of November through March of any period during which this contract is in force, Consumers shall have the right to withdraw natural gas.

#### **ITEM 7 - Cushion Gas**

Egyptian retains the right to determine the volumes of Cushion Gas required for Consumers and any other gas storage customer utilizing this facility. As this provision will apply to Consumers and based upon the volume of storage specified in paragraph 1 above, it is to be understood that Consumers shall provide Cushion Gas in the amount of 50,000 DTH. Cushion gas may be withdrawn for emergency purposes only up to the amount of 50% of the Cushion Gas Provided. In the event of withdrawal of Cushion Gas in any amount, it is understood that Consumers shall replace the gas the following injection period.

#### **ITEM 8 - Measurements**

All measurement of volumes of natural gas as injected or withdrawn shall be made on Egyptian's meters installed at the interconnection between the point or points of delivery to Egyptian, the same to be described accurately in the contract to be signed by the parties hereto. In this connection, it is agreed that Consumers shall have the right, at their expense, to add their own check meter at the point of delivery and to keep and maintain the same for their own uses and purposes. Consumers shall have full right of inspection of all meters and the contract will have meter adjustment provisions consistent with TETCO standards as contained in the gas sales contracts.

#### **ITEM 9 - Quality**

This agreement contains the customary provisions required by the 1983 Illinois Administrative Code Part 530, which govern the quality of natural gas to be stored.

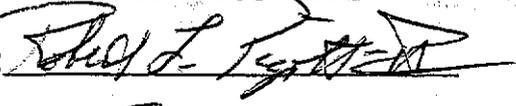
**ITEM 10 - Pipeline Transportation**

Egyptian owns a six inch (6") and four inch (4") gas line extending sixteen (16) miles from Consumers' Carmi Border Station in White County, Illinois, to the Mills Storage Field in Gallatin County, Illinois and this line is used to service Consumers' customers (farm taps) and the Village of New Haven, Illinois. Item 2 of this agreement set forth the appropriate Transportation and Daily Demand Charges.

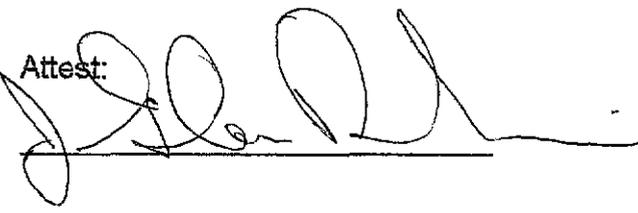
Egyptian retains the right to control the direction of flow of natural gas in that section of the pipeline herein leased. Natural gas made available to Consumers shall be metered at the interconnection between Consumers and Egyptian approximately two (2) miles north of the Mills Gas Storage Field. Consumers shall have the responsibility of installing the meter to be used in this connection and shall maintain and read the same at its expense. Consumers shall also be responsible for furnishing and reading all farm taps along the pipeline herein leased. Monthly measurements of New Haven and farm tap meters shall be furnished to Egyptian on or before the 10th day of each calendar month which monthly measurements shall be use by Egyptian for billing purposes.

In witness whereof, the parties have duly executed this Agreement in multiple counterpart on the day and year first above written.

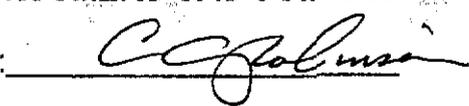
**EGYPTIAN GAS STORAGE**

By: 

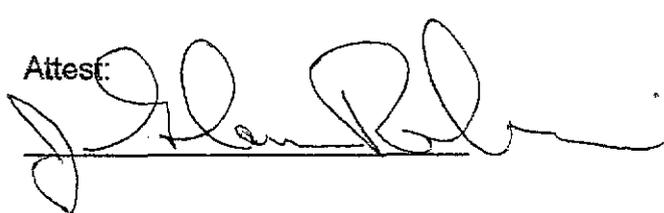
Title: Sec. Treas.

Attest: 

**CONSUMERS GAS COMPANY**

BY: 

Title: President

Attest: 

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CONSUMERS GAS COMPANY'  
C. A. ROBINSON, PRESIDENT  
(812) 477-9030  
e-mail: [consumersgasco@yahoo.com](mailto:consumersgasco@yahoo.com)

### THE GAS SYSTEM

ENG 2.6 Referring to your Company's response to Staff data request ENG 2.05, 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.

(See attached spreadsheet detailing storage withdrawals and injections by day for each month of the reconciliation period).

\* The lateral line is the feed line to and from the storage field . Consumers has customers along this pipeline, thus they would be using gas at all times. The gas used during the injection period is considered gas withdrawal from the storage field and priced accordingly.

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 DATA REQUEST ENG 2.6

DAY	JANUARY		FEBRUARY		MARCH		APRIL		MAY		JUNE	
	W/DRAWAL	INJECTION										
1	1,096		773		1779							1,000
2	1,116		731		843							1,000
3	1,131		737		774							1,000
4	1,146		777		792							1,000
5	1,060		783		792							1,000
6	1,125		781		794							1,000
7	1,170		703		733							1,000
8	1,062		613		635							1,000
9	488		414		749							1,000
10	579		779		751							1,000
11	696		725		770							1,000
12	706		696		730							1,000
13	714		741		171							1,000
14	692		735		0							1,000
15	715		714		0							1,000
16	705		547		0							1,000
17	717		746		0							1,000
18	710		610		0							1,000
19	706		415		960							1,000
20	713		597		735							1,000
21	663		789		1041							1,000
22	610		736		81							1,000
23	265		671		0							1,000
24	732		406		0							1,000
25	666		616		0							1,000
26	584		1,575		0							1,000
27	477		1,583		0							1,000
28	218		1,421		0							1,000
29	181				0							1,000
30	406				0							1,112
31	260				0							
*LATERA	3,403		3,430		3107		1,362		700		435	
LINE												
TOTAL	25,512		24,844		16,237	0	1,362	0	700	0	435	30,112

NOTE: All volumes are in MCF for this report.

ICC DOCK  
DATA REC

DAY	JULY		AUGUST		SEPTEMBER		OCTOBER		NOVEMBER		DECEMBER	
	W/DRAWAL	INJECTION	W/DRAWAL	INJECTION	W/DRAWAL	INJECTION	W/DRAWAL	INJECTION	W/DRAWAL	INJECTION	W/DRAWAL	INJECTION
1		1,000		1,000								917
2		1,000		1,000								908
3		1,000		1,000								940
4		1,000		1,000								891
5		1,000		1,000								927
6		1,000		1,000								955
7		1,000		1,000								940
8		1,000		1,000								957
9		1,000		1,000								951
10		1,000		1,000								949
11		1,000		1,000								947
12		1,000		1,000								936
13		1,000		1,000					970			943
14		1,000		1,000					930			933
15		1,000		1,000					966			914
16		1,000		1,000					972			936
17		1,000		1,000					604			818
18		1,000		1,000					356			694
19		1,000		1,000					603			936
20		1,000		1,000					944			947
21		1,000		1,000					968			936
22		1,000		1,000					609			925
23		1,000		1,000					976			940
24		1,000		1,000					983			922
25		1,000		1,000					959			924
26		1,000		1,000					941			928
27		1,000		1,000					983			932
28		1,000		1,000					959			936
29		1,000		1,000					941			920
30		1,000		1,000					977			706
31		1,000		1,028								924
*LATERAL LINE TOTAL	386		344		1032		1358		2979		4268	
TOTAL	386	31,000	344	31,028	1,032	0	1,358	0	18,620	0	32,600	0

NOTE: AI

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C. A. ROBINSON, PRESIDENT  
(812) 477-9030  
e-mail: [consumersgasco@yahoo.com](mailto:consumersgasco@yahoo.com)

### THE GAS SYSTEM

ENG 2.7 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.

Consumers has no propane or LNG facilities.

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### THE GAS SYSTEM

ENG 2.9 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.

No - there were no capacity restrictions.

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THE GAS SYSTEM

ENG 2.11 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.

Annual Peak Day: February 26, 2002 7,617 DTH

		<u>CARMI</u>	<u>ALBION</u>	<u>OMAHA</u>	<u>DAILY MAX</u>
JANUARY	02	2,995	2,276	1,378	6,649
FEBRUARY	26	3,489	2,575	1,553	7,617
MARCH	03	3,449	2,260	1,548	7,307
APRIL	03	2,020	1,794	893	4,707
MAY	02	810	780	268	1,858
JUNE	06	283	419	105	807
JULY	18	274	358	107	739
AUGUST	05	693	336	97	1,126
SEPTEMBER	25	350	686	226	1,262
OCTOBER	31	1,350	1,124	646	3,120
NOVEMBER	27	2,775	1,776	1,120	5,671
DECEMBER	05	3,015	2,309	1,447	6,771

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### THE GAS SYSTEM

ENG 2.12 Did your utility 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.

There were no curtailments during this reconciliation period.

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THE GAS SYSTEM

ENG 2.13 Did your utility 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.

There was no overrun occurrences during this reconciliation period.

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THE GAS SYSTEM

ENG 2.14 Provide the annual quantity of unaccounted for gas, in percent, based on your utility's total sendout for the reconciliation period. Also, provide the unaccounted for value your utility provided to the Department of Transportation for the period July 1, 2001 through June 30, 2002. If either of the values provided is greater than 3%, provide an explanation. Also, provide your utility'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 utility has taken to reduce or account for the increasing levels of unaccounted for gas.

<u>Reconciliation Period</u>		<u>DOT report</u>
2.11%	unaccounted for 2002	4.26%
4.11%	unaccounted for 2001	4.11%
4.89%	unaccounted for 2000	4.89%

Consumers is in the process of replacing all of its gas meters with new temperature compensated meter. The replacement schedule is for 500 to 600 meters to be changed out over a period of 10 years. This was the third year of the replacement schedule. The older, non-temperature compensated, meter would account for approximately 2% of the past unaccounted for gas in our system.. The unaccounted for gas has shown improvement and should continue to do so as older meters are replaced within our system.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.15 Explain the gas load forecasting methods used by your utility 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 utility's basis for those assumptions.

Consumers, having a customer base that does not fluctuate (residential, commercial, industrial), forecasts its gas load on historical data - previous gas usage and weather temperature. With little change in the customer base structure, gas usage would stay the same from year to year. The factor that does change our gas load is weather related only.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.16 Explain how your utility planned its mix of purchases to help ensure that your utility 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.

Nominations are made monthly to our gas supplier based on historical usage. Our gas supplier does our balancing and can reduce or increase our gas supply. Also, gas from Consumers' storage and purchased gas from Egyptian Gas Storage Corp. is available if we have a severe gas shortfall

ICC DOCK. #02-0719  
CONSUMERS GAS COMPANY'  
C. A. ROBINSON, PRESIDENT  
(812) 477-9030  
e-mail: [consumersgasco@yahoo.com](mailto:consumersgasco@yahoo.com)

MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.17 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 utility as a basis for each of these values. Provide any work papers, reports, studies, or analyses that were used by your utility to apply these criteria to the reconciliation period. If none of these documents are supplied, explain why not.

We nominate for each station based on historic usage. We, also, have gas in Egyptian Gas Storage Field that can be accessed during a high demand period. If our nominations for the month are not adequate for the period we have the ability to increase our nomination.

Our pipeline MDQ for each territory is as follows:

T.E.	<u>Storage</u>	<u>Egyptian</u>
Carmi - 5,538 DTH	1,500 DTH	1,000 DTH
Albion- 4,208 DTH		
Omaha- 1,320 DTH	500 DTH	350 DTH

Woodward Marketing, our gas supplier, manages all imbalances with the pipeline company as per our contract.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.18 Explain how often after the fact evaluations and audits are conducted by your utility 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 that 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.

- A: Each year the amount of gas purchased and the gas costs are reviewed in relation to the severity of our weather conditions. This review is made each January after our previous year's totals are available.
- B: The annual PGA reconciliation, by an outside auditor, is compiled in February following the close of the year.
- C: No changes have been made in the company procedures.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.20 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.

The review of gas nominations and purchases are made each month. This is done in the nomination week, which is the third week of the month. These numbers are reviewed again when the invoices are received and set up for payment.

The President/General Manager reviews all gas deliveries and prices for accuracy before payment is made.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.21 Provide the date when the purchasing and contracting procedures were most recently changed and explain why the changes were made.

The current gas purchasing contract is with Woodward Marketing and was for a 10 year period that began October 1, 1992 and expired September 30, 2002. Consumers Gas Storage Contract with Egyptian was entered into June 1, 1998. On May 8, 1998, docket #97-0338, the Illinois Commerce Commission granted permission for Consumers to enter into a "purchase agreement" with Egyptian Gas Corp. to purchase local gas.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.25 Identify all procedures used by your utility 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 utility before any new contracts were awarded during the reconciliation period.

Texas Eastern Transmission Corp. is the only major pipeline serving Consumers service area so all major gas supply must be transported through them. Consumers Gas also has a purchase contract with Egyptian Gas Storage and continues to buy local gas. Consumers Gas went to one (1) supplier for the major part of its gas supply. We had to have someone that could obtain a firm supply of gas and also someone to handle the balancing with Texas Eastern. We felt that using one (1) supplier would be the best and most cost effective way to do this. To insure a fixed price, our supplier uses an index price from Natural Gas Weekly based on the price of gas the first Monday of each month and this fixed price is for the entire month.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.26 Provide a listing, by interstate pipeline, of all pipeline transportation and storage capacity reserved by your utility. For each item of capacity listed, include the name of the pipeline 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. Also provide the dates for which each of those agreements is in effect.

We have pipeline transportation with Texas Eastern Pipeline Co. We have three (3) take points on T.E.'s line;

Carmi's Tap #089	5,538 MDQ
Albion Tap #1018	4,320 MDQ
Omaha Tap #937	1,320 MDQ

Texas Eastern had a monthly demand charge of \$.007 per MDQ dth in 2002. There is also a reservation charge for pipeline capacity of \$1.780/dth which is set for twelve months on the highest daily volume in the period.

Consumers had a contract with Egyptian Gas Storage Corp. to store 160,000 MCF of gas of which 50,000 MCF is to be held as cushion gas. The price of this Storage is as follows:

Demand charge	\$2.50 per MCF
Reservation charge	\$0.025 per MCF
T-O-P Storage	\$0.01 per MCF
Withdrawal charge	\$0.10 per MCF
Injection charge	\$0.10 per MCF

There is a 2% shrinkage volume figured at time of injection

Consumers also has a purchase agreement with Egyptian Gas Storage for the following maximum volumes of gas:

Carmi	1,000 MCF
Omaha	350 MCF

There is no demand charge by Egyptian Gas.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2,27 Explain how your utility 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 released transactions listed together). For each transaction, include the name of the pipeline(s) providing the capacity; whether your utility is releasing the capacity or accepting capacity that is released by another company; the amount of capacity that was involved; and 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 utility ensured preferential treatment was not provided to its affiliate.** Also, provide a definition, including examples, of each transaction group.

We were not involved in any "capacity release" during this reconciliation period.

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C. A. ROBINSON, PRESIDENT  
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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.28 Explain how your utility made use of off-system sales of gas originally purchased for use by your utility'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; and 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 utility ensured preferential treatment was not provided to its affiliate.** Also, provide a definition, including examples, of each sales group.

We made no buy/sell transactions of "capacity release" during this reconciliation period.

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MANAGEMENT, DECISION MAKING, AND PLANNING

ENG 2.29 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.**

None.

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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.30 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, that 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.**

None

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CONSUMERS GAS COMPANY'  
C. A. ROBINSON, PRESIDENT  
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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.31 List any other transactions that conducted under FERC tariffs for the reconciliation period that was not provided in response the ENG 2.29 or 2.30. 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.**

None.

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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.32 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.**

None

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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.35 If your utility 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 contract information was provided previously to the Engineering Department, it is not necessary to send it again, however information and/or discussions necessary to determine how the Company selected those contracts is still necessary.

Consumers' has pre-purchased contracts with Woodward Marketing and this information has been provided to the ICC Engineering Department.

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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.36 Provide all reports, memorandums, summaries, workpapers and/or other documents pertaining to any hedging programs or strategies utilized by your utility.

Consumers' pre-purchased gas for the winter months in an effort to obtain a lower price on gas. The following is a summary of our pre-purchased gas:

Nominated Gas Purchases - June 22, 2001

<u>MONTH</u>	<u>CARMI</u>	<u>OMAHA</u>	<u>ALBION</u>	<u>TOTAL VOL.</u>	<u>PRICE</u>
JAN 2002	25,000 DTH	10,000 DTH	30,000 DTH	65,000 DTH	\$4.42
FEB 2002	15,000 DTH	10,000 DTH	20,000 DTH	45,000 DTH	\$4.30
MAR 2002	15,000 DTH	10,000 DTH	15,000 DTH	40,000 DTH	\$4.08

Nominated Gas Purchases - June 27, 2001

JAN 2002			20,000 DTH	20,000 DTH	\$4.19
FEB. 2002			10,000 DTH	10,000DTH	\$4.06
MAR 2002			10,000 DTH	10,000 DTH	\$3.865

Nominated Gas Purchases - May 24, 2002

NOV 2002	9,000 DTH	5,000 DTH	5,000 DTH	19,000 DTH	\$4.32
DEC 2002	15,000 DTH	8,000 DTH	7,000 DTH	30,000 DTH	\$4.59

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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.37 Explain, in as much detail as possible, any hedging programs or strategies utilized by your utility. What signal(s) or decision rule(s) did your utility rely upon to enter into the contracts included in the response to data request number ENG 2.35? Provide any analyses the signals or decision rules employed by your utility. Provide copies of all invoices and receipts supporting hedging activity.

When gas is reasonably priced for winter months, gas is pre-purchased to make sure we do not get caught with excess prices during any of the winter months.

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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.38 If any costs or credits flowed through the PGA are attributable to transactions between your utility 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.

None

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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.39 Does your utility diversify its supply portfolio by entering into a combination of fixed and market priced supply contracts? If no, explain why not. If yes, than 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 utility's customers.

Consumers purchases gas from one gas supplier who is responsible for balancing our gas volumes. The gas cost is fixed to the index price quoted the first Monday of the month and applies for all gas purchased during the month. Consumers has no market price contract.

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MANAGEMENT, DECISION MAKING PLANNING

ENG 2.40 Does your utility benchmark its gas purchasing costs to other companies during the reconciliation period in order to evaluate the effectiveness of its gas purchasing procedures? If yes, provide a summary of your utilities review and what changes or recommendations were made as a result of this review. If no, explain why no comparison was done.

Consumers does not benchmark its gas purchasing costs with other utilities; however, Consumers has discussed gas purchasing and prices with other utilities located in southwestern Indiana and southeastern Illinois..

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### CONTRACTS

ENG 2.41 List each **firm** purchase contract, not previously provided, and propane purchase contract relevant to the reconciliation period and provide the following details in spreadsheet format, with one contract per row;

- A) Supplier;
- B) Effective date;
- C) Termination date;
- D) Provisions for extension;
- E) Provisions for termination;;
- F) Provisions for renegotiation of terms;
- G) Contract type (swing, base load, etc.);
- H) Any affiliation between the supplier and your utility
- I) Supplier's location (metering points, pipeline names, etc.);
- J) Contract quantities (daily limits, monthly entitlements, etc. ),
- K) Gas commodity cost (per unit),
- L) Transportation cost (per unit),
- M) Demand charges (per unit),
- N) Any stated minimum and maximum purchase quantity limits,
- O) Overrun provision, and
- P) 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.

- A) Woodward Marketing
- B) June 1, 1992
- C) October 31, 2002
- D) Month to Month
- E) 30 days prior to beginning of month
- F) 90 days prior to anniversary date each year - the parties can reopen the contract

- G) Firm gas supply
- H) None
- D) TET pipeline meter station #089, #937, #1016
- J) Monthly nominations
- K) Natural Gas Weekly index price at Kosciusko, MS, on 1<sup>st</sup> Monday of the month.  
Index price plus (+) 3% plus (+) 10 cents per DTH.
- L) Texas Eastern tariff tare - Zone 1 to Zone 1
- M) None
- N) None - only restrictions are TET (pipeline) MDQ's
- O) If we have to make additional nomination because of colder than expected weather,  
we will pay the "index" price plus 10 cents on the additional gas if it is more than our  
original "index price.
- P) None

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### CONTRACTS

ENG 2.43 For each new or renegotiated firm supply, transportation, or storage contract entered into during the reconciliation period, provide the analysis used to choose that contract. Show 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 Utility at that time (ex. How is reliability of supply versus low cost taken into account, number of other suppliers and options considered, etc.).

None

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### CONTRACTS

ENG 2.44 Explain all reasons why your utility believes that any lower priced alternative source identified in staff data request END 2.43 is inferior or less desirable than the contract in effect during the reconciliation period.

N/A

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### CONTRACTS

ENG 2.45      How many entities does your utility contact when obtaining bids for its firm and spot gas purchases. Also, if your utility purchases propane, identify the number of entities contacted for those purchases.

One

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CONSUMERS GAS COMPANY  
C. A. ROBINSON, PRESIDENT  
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e-mail: [consumersgasco@yahoo.com](mailto:consumersgasco@yahoo.com)

### CONTRACTS

ENG 2.48 Explain all efforts your utility made during the reconciliation period to take advantage of favorable market conditions to renegotiate its contracts or to purchase from alternative market sources. If no contract renegotiations were attempted, explain why not.

Consumers pre-purchased gas for winter months to obtain favorable gas prices.

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### CONTRACTS

ENG 2.49 Explain how your utility formulated each contract renegotiation position that it put forward and how it evaluated each contract renegotiation position put forward by a contracted supplier during the reconciliation period.

None

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### CONTRACTS

ENG 2.50      Provide a monthly summary of the gas, gas storage, and propane quantities purchased and their price (\$/DTH) from the different sources during the reconciliation period. Also, indicate if the gas purchases were the result of a firm or spot contract.

(SEE ATTACHED SPREAD-SHEET)

CONSUMERS GAS COMPANY  
 GAS PURCHASE SUMMARY  
 FOR YEAR 2002

	WOODWARD MARKETING		PREPURCHASED GAS		STORAGE INJ.		STORAGE W/D	
	<u>VOLUME</u>	<u>PRICE/DTH*</u>	<u>VOLUME</u>	<u>PRICE/DTH</u>	<u>VOLUME</u>	<u>PRICE/DTH</u>	<u>VOLUME</u>	<u>PRICE/DTH</u>
JAN	22,982	2.7368	65,000	4.6526			27,380	5.2503
			20,000	4.4200				
FEB	39,632	2.2733	45,000	4.5290			26,573	5.0142
			10,000	4.2800				
MAR	44,193	2.7059	40,000	4.3024			16,791	5.0585
			10,000	4.0800				
APR	35,903	3.6226					1,404	5.0585
MAY	23,117	3.8698			0	0.0000	700	5.0585
JUNE	13,415	3.5093			30,112	3.8200	435	5.0585
JULY	12,602	3.6020			31,000	3.6600	386	5.0585
AUG	15,399	3.3342			31,028	3.3100	351	5.0585
SEPT	17,489	3.5711			0	0.0000	1,036	5.0585
OCT	40,613	4.4054			0	0.0000	1,389	5.0585
NOV	55,483	4.5187	19,000	4.3200			14,699	5.1012
DEC	63,305	4.4878	30,000	4.5900			33,575	5.1588

\*Transportation cost not included in price.

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**CONTRACTS**

ENG 2.52 Explain all the provisions your utility attempted to have included in its contracts to help facilitate future renegotiation of the contracts. Explain any such provisions that were included in any contracts awarded during the reconciliation period.

None