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Public Service  
Commission

Western Lewis Rectorville Water and Gas District

In the matter of: Purchased Gas Adjustment filing of Western Lewis-Rectorville Water and Gas Case no 2016-0046.

Responses to Questions with Attachments:

1. Yes, Western Lewis is aware of large over-recoveries of gas costs that need to be returned to their customers. For the past couple of years, there has been an inflated gas cost recovery (GCR) rate per Mcf, which in turn has led to large variances between what the customer should have been billed vs what they were billed for the gas costs. The revenues received because of the inflated GCR rate were used to maintain day to day operations of the gas system. The reason for the inflated GCR rate is because the base rate was too low to cover basic overhead costs, let alone needed repairs, maintenance, and required updates to properly maintain the gas system.
2. At the present time, Western Lewis does not have the ability to make refunds.
3. Western Lewis does not maintain its GCR revenues separately from its base rate revenues.
4. On of February 1, 2017, Western Lewis filed an Application for Rate Adjustment regarding the gas base rate. This is the first request for an increase to the base rate since 1993. As such, it is a fairly significant increase to the base rate, but a necessary one.
5. In regards to the BTU conversion factor on volumes sold to Western Lewis at its city-gate (the interconnect to Columbia Pipeline "TCO") of 1.084.6 is a calculated number that is provided by the TCO pipeline each month based on the heat content of the gas supply flowing into the Western Lewis system at its city-gate. TCO has the ability to measure, at each of their delivery meters, the heat content of the gas supply being delivered on a daily basis. **Please see attached December 2016 Pipeline Measurement Delivery Report (Attachment A)**. In the report, the last three columns show the Measured Quantity as (MCF), the BTU factor per gas day and the Energy QTY (DTH). The total MCF measured for all three meters was 7,128 MCF's and the total DTH's as 7,731 Dth's. The difference is the average BTU factor of 1084.2 or 1.0842. The BTU factor is based on the heat content for the supply flowing on the TCO pipeline. I have also attached the July 2016 Pipeline Measurement Delivery Report so that you can see that although the BTU factor is different, only 1.053 on average, the calculation to adjust from MCF to DTH is the same each month. PLEASE NOTE: Atmos invoices in Dth's because that is what TCO invoices us, for pass through to Western Lewis each month.
  - a. We are not sure where the numbers have been pulled from, as they do not match amounts in our records.
  - b. Same as "a".
6. This is a definite area of concern for Western Lewis regarding the lost and unaccounted for gas. We are currently reviewing prior data to ensure that correct and accurate amounts have been used to calculate the line loss.
7. Please see Attachment B.
8. Western Lewis' customer bills are all prepared for the same usage period.
9. Western Lewis typically reads its gas customers' meters between the 15<sup>th</sup> and 20<sup>th</sup> of each month.
10. Atmos bills on a monthly cycle that matches TCO's meter read cycle. Atmos invoices Western Lewis on, or around the 15<sup>th</sup> of each month for the previous months burn. TCO reads the meter on or around the first and last day of each month and then uploads that data into their Electronic Bulletin Board (EBB). On or around the 12<sup>th</sup>/13<sup>th</sup> day of the month, TCO will finalize

the volumes and allow Atmos to bill per the meter reads on the EBB. For example, for the month of December, TCO read the meters on or around December 1<sup>st</sup> and December 31<sup>st</sup>; finalized the volumes around January 13<sup>th</sup> and Atmos invoiced Western Lewis on the 16<sup>th</sup> of January.

Please note: Responses to questions 1, 2, 3, 4, and 6 were provided by Chad Clark, General Manager of Western Lewis. Responses to questions 5, 5a, 5b, and 10 were provided by Trevor L. Atkins, CenterPoint Energy Services – formerly Atmos Energy Marketing. Responses to questions 7, 8, and 9 were provided by Pauline Bickley, Office Manager of Western Lewis.



**Columbia Gas Transmission, LLC  
Measurement Detail Report  
12/1/2016**

Create Date/Time: 1/24/2017 2:50:23 PM

Point Operator: Western Lewis-Rectorville Water & Gas District  
Meter Nbr: 80449701 Meter Name: WESTERN-LEWIS RECTORVILLE

Questions may be addressed to:  
Roger Dawson  
(304)357-2383  
GasMeasurement@cpg.com

On	Off	Flow Time	Meter Index Reading	Meter Index Diff	Flow Temp	Avg Press (psia)	Gravity	Mol % N2	Mol % CO2	Meas Qty (MCF)	BTU	Energy Qty (Dth)
12/1	12/2	24.0	0.00	14.07	54.1	83.8	0.6121	0.531	0.191	82	1090.0	89
12/2	12/3	24.0	0.00	14.81	54.4	83.5	0.6109	0.526	0.187	86	1088.0	93
12/3	12/4	24.0	0.00	13.97	54.6	83.6	0.6078	0.529	0.191	81	1083.0	88
12/4	12/5	24.0	0.00	11.69	54.4	84.2	0.6085	0.538	0.190	68	1084.0	74
12/5	12/6	24.0	0.00	10.71	55.1	84.4	0.6097	0.561	0.192	63	1086.0	68
12/6	12/7	24.0	0.00	12.41	54.3	84.0	0.6102	0.557	0.192	72	1086.0	79
12/7	12/8	24.0	0.00	14.10	54.3	83.8	0.6106	0.551	0.192	82	1087.0	89
12/8	12/9	24.0	0.00	21.37	53.6	82.7	0.6079	0.572	0.198	123	1082.0	133
12/9	12/10	24.0	0.00	25.32	53.6	82.1	0.6061	0.577	0.204	144	1079.0	156
12/10	12/11	24.0	0.00	21.24	54.0	83.2	0.6052	0.456	0.187	123	1080.0	133
12/11	12/12	24.0	0.00	14.85	54.2	83.9	0.6057	0.461	0.185	87	1081.0	94
12/12	12/13	24.0	0.00	15.32	53.9	83.9	0.6055	0.461	0.181	89	1081.0	97
12/13	12/14	24.0	0.00	17.29	54.3	83.4	0.6094	0.578	0.202	100	1085.0	109
12/14	12/15	24.0	0.00	23.54	53.4	82.6	0.6075	0.498	0.184	135	1083.0	146
12/15	12/16	24.0	0.00	28.70	53.1	81.7	0.6069	0.475	0.191	163	1082.0	177
12/16	12/17	24.0	0.00	21.32	53.5	83.5	0.6060	0.447	0.195	124	1082.0	134
12/17	12/18	24.0	0.00	9.53	52.6	85.2	0.6048	0.436	0.189	56	1080.0	61
12/18	12/19	24.0	0.00	22.03	53.5	82.9	0.6056	0.447	0.179	127	1081.0	137
12/19	12/20	24.0	0.00	23.59	53.6	82.6	0.6050	0.482	0.192	135	1080.0	146
12/20	12/21	24.0	0.00	20.90	53.7	83.2	0.6049	0.457	0.189	121	1080.0	131
12/21	12/22	24.0	0.00	16.37	54.1	83.7	0.6067	0.468	0.193	95	1082.0	103
12/22	12/23	24.0	0.00	18.65	53.9	83.4	0.6088	0.466	0.181	108	1086.0	117
12/23	12/24	24.0	0.00	13.79	54.1	83.9	0.6132	0.538	0.175	80	1092.0	88
12/24	12/25	24.0	0.00	11.52	54.3	84.3	0.6148	0.554	0.182	67	1094.0	74
12/25	12/26	24.0	0.00	8.59	54.3	85.3	0.6117	0.553	0.202	51	1088.0	55
12/26	12/27	24.0	0.00	4.73	57.0	86.1	0.6080	0.508	0.197	28	1084.0	30
12/27	12/28	24.0	0.00	14.18	54.1	83.7	0.6108	0.546	0.191	82	1087.0	90
12/28	12/29	24.0	0.00	12.31	53.9	84.0	0.6123	0.757	0.234	72	1085.0	78
12/29	12/30	24.0	0.00	16.05	53.1	83.6	0.6073	0.587	0.207	93	1081.0	101

Attachment A p. 2/4

12/30	12/31	24.0	0.00	19.17	53.6	83.2	0.6109	0.567	0.207	111	1087.0	121
12/31	1/1	24.0	0.00	17.26	54.1	83.4	0.6081	0.517	0.207	100	1083.0	108
<b>Totals</b>		<b>744.0</b>			<b>54.0</b>	<b>83.6</b>				<b>2948</b>	<b>1084.2</b>	<b>3197</b>

Point Operator: Western Lewis-Rectorville Water & Gas District  
 Meter Nbr: 80449702 Meter Name: WESTERN-LEWIS RECTORVILLE

Questions may be addressed to:  
 Roger Dawson  
 (304)357-2383  
 GasMeasurement@cpg.com

On	Off	Flow Time	Meter Index Reading	Meter Index Diff	Flow Temp	Avg Press (psia)	Gravity	Mol % N2	Mol % CO2	Meas Qty (MCF)	BTU	Energy Qty (Dth)
12/1	12/2	24.0	0.00	15.18	54.1	82.9	0.6121	0.531	0.191	87	1090.0	95
12/2	12/3	24.0	0.00	16.04	54.4	82.6	0.6109	0.526	0.187	92	1088.0	100
12/3	12/4	24.0	0.00	15.15	54.6	82.7	0.6078	0.529	0.191	87	1083.0	94
12/4	12/5	24.0	0.00	12.76	54.4	83.3	0.6085	0.538	0.190	74	1084.0	80
12/5	12/6	24.0	0.00	11.76	55.0	83.5	0.6097	0.561	0.192	68	1086.0	74
12/6	12/7	24.0	0.00	13.53	54.3	83.2	0.6102	0.557	0.192	78	1086.0	85
12/7	12/8	24.0	0.00	15.31	54.3	82.9	0.6106	0.551	0.192	88	1087.0	96
12/8	12/9	24.0	0.00	22.82	53.6	81.8	0.6079	0.572	0.198	130	1082.0	140
12/9	12/10	24.0	0.00	26.98	53.6	81.3	0.6061	0.577	0.204	152	1079.0	165
12/10	12/11	24.0	0.00	22.62	54.0	82.3	0.6052	0.456	0.187	129	1080.0	140
12/11	12/12	24.0	0.00	16.14	54.2	82.9	0.6057	0.461	0.185	93	1081.0	101
12/12	12/13	24.0	0.00	16.54	53.9	82.9	0.6055	0.461	0.181	95	1081.0	103
12/13	12/14	24.0	0.00	18.67	54.3	82.5	0.6094	0.578	0.202	107	1085.0	116
12/14	12/15	24.0	0.00	25.05	53.4	81.7	0.6075	0.498	0.184	142	1083.0	154
12/15	12/16	24.0	0.00	30.47	53.1	80.8	0.6069	0.475	0.191	171	1082.0	186
12/16	12/17	24.0	0.00	22.79	53.5	82.5	0.6060	0.447	0.195	131	1082.0	141
12/17	12/18	24.0	0.00	10.45	52.6	84.1	0.6048	0.436	0.189	61	1080.0	66
12/18	12/19	24.0	0.00	23.42	53.5	82.1	0.6056	0.447	0.179	134	1081.0	145
12/19	12/20	24.0	0.00	25.10	53.6	81.7	0.6050	0.482	0.192	142	1080.0	154
12/20	12/21	24.0	0.00	22.29	53.7	82.3	0.6049	0.457	0.189	127	1080.0	138
12/21	12/22	24.0	0.00	17.71	54.1	82.7	0.6067	0.468	0.193	102	1082.0	110
12/22	12/23	24.0	0.00	20.02	53.9	82.6	0.6088	0.466	0.181	115	1086.0	125
12/23	12/24	24.0	0.00	15.07	54.1	82.9	0.6132	0.538	0.175	87	1092.0	95
12/24	12/25	24.0	0.00	12.55	54.3	83.4	0.6148	0.554	0.182	73	1094.0	79
12/25	12/26	24.0	0.00	9.33	54.3	84.4	0.6117	0.553	0.202	55	1088.0	60
12/26	12/27	24.0	0.00	5.18	57.0	85.3	0.6080	0.508	0.197	30	1084.0	33
12/27	12/28	24.0	0.00	15.30	54.1	83.0	0.6108	0.546	0.191	88	1087.0	96
12/28	12/29	24.0	0.00	13.41	53.9	83.2	0.6123	0.757	0.234	77	1085.0	84
12/29	12/30	24.0	0.00	17.34	53.1	82.7	0.6073	0.587	0.207	100	1081.0	108
12/30	12/31	24.0	0.00	20.53	53.6	82.3	0.6109	0.567	0.207	117	1087.0	128
12/31	1/1	24.0	0.00	18.62	54.1	82.6	0.6081	0.517	0.207	107	1083.0	116
<b>Totals</b>		<b>744.0</b>			<b>54.0</b>	<b>82.8</b>				<b>3139</b>	<b>1084.2</b>	<b>3405</b>

Point Operator: Western Lewis-Rectorville Water & Gas District  
 Meter Nbr: 80841801 Meter Name: ORANGEBURG

Questions may be addressed to:

GasMeasurement@cpg.com

On	Off	Flow Time	Meter Index Reading	Meter Index Diff	Flow Temp	Avg Press (psia)	Gravity	Mol % N2	Mol % CO2	Meas Qty (MCF)	BTU	Energy Qty (Dth)
12/1	12/2	24.0	7368.00	7.27	39.0	58.9	0.6120	0.528	0.189	31	1091.0	33
12/2	12/3	24.0	7375.00	6.76	39.0	59.2	0.6100	0.526	0.188	29	1088.0	31
12/3	12/4	24.0	7382.00	7.13	39.0	59.1	0.6070	0.529	0.191	30	1083.0	33
12/4	12/5	24.0	7388.00	5.70	39.0	59.5	0.6080	0.541	0.191	24	1085.0	26
12/5	12/6	24.0	7393.00	5.43	39.0	59.6	0.6090	0.561	0.192	23	1086.0	25
12/6	12/7	24.0	7400.00	6.53	39.0	59.3	0.6100	0.556	0.193	28	1087.0	30
12/7	12/8	24.0	7407.00	7.06	39.0	59.2	0.6100	0.551	0.190	30	1088.0	32
12/8	12/9	24.0	7417.00	9.76	39.0	58.3	0.6070	0.581	0.200	41	1082.0	44
12/9	12/10	24.0	7428.00	11.67	39.0	58.0	0.6060	0.561	0.203	48	1080.0	52
12/10	12/11	24.0	7439.00	10.75	39.0	58.3	0.6050	0.455	0.186	45	1081.0	48
12/11	12/12	24.0	7447.00	7.62	39.0	59.2	0.6050	0.462	0.185	32	1082.0	35
12/12	12/13	24.0	7454.00	7.50	39.0	59.3	0.6050	0.462	0.180	32	1082.0	34
12/13	12/14	24.0	7463.00	8.51	39.0	59.0	0.6090	0.587	0.205	36	1085.0	39
12/14	12/15	24.0	7474.00	11.51	39.0	58.1	0.6070	0.490	0.183	47	1084.0	51
12/15	12/16	24.0	7488.00	13.14	39.0	57.6	0.6060	0.472	0.192	54	1083.0	58
12/16	12/17	24.0	7498.00	10.09	39.0	58.6	0.6050	0.447	0.195	42	1082.0	46
12/17	12/18	24.0	7503.00	5.16	39.0	59.4	0.6040	0.434	0.187	22	1080.0	24
12/18	12/19	24.0	7514.00	11.07	39.0	58.1	0.6050	0.452	0.179	46	1082.0	50
12/19	12/20	24.0	7525.00	11.40	39.0	58.1	0.6040	0.483	0.193	47	1080.0	51
12/20	12/21	24.0	7535.00	9.48	39.0	58.6	0.6040	0.457	0.189	40	1080.0	43
12/21	12/22	24.0	7543.00	7.83	39.0	59.1	0.6070	0.468	0.191	33	1084.0	36
12/22	12/23	24.0	7552.00	9.02	39.0	58.8	0.6080	0.465	0.181	38	1086.0	41
12/23	12/24	24.0	7558.00	6.53	39.0	59.6	0.6130	0.549	0.174	28	1093.0	30
12/24	12/25	24.0	7564.00	5.51	39.0	59.8	0.6140	0.551	0.183	24	1094.0	26
12/25	12/26	24.0	7568.00	4.27	39.0	60.0	0.6110	0.551	0.204	18	1088.0	20
12/26	12/27	24.0	7570.00	2.24	39.0	59.7	0.6070	0.501	0.194	10	1084.0	10
12/27	12/28	24.0	7578.00	7.57	39.0	58.7	0.6110	0.558	0.193	32	1088.0	34
12/28	12/29	24.0	7584.00	6.18	39.0	59.2	0.6110	0.775	0.237	26	1085.0	28
12/29	12/30	24.0	7592.00	8.19	39.0	58.8	0.6070	0.560	0.204	34	1082.0	37
12/30	12/31	24.0	7601.00	9.34	39.0	58.5	0.6100	0.564	0.206	39	1087.0	42
12/31	1/1	24.0	7610.00	8.65	39.0	58.7	0.6070	0.518	0.208	36	1084.0	39
<b>Totals</b>		<b>744.0</b>			<b>39.0</b>	<b>58.9</b>				<b>1041</b>	<b>1084.7</b>	<b>1129</b>

Attachment B

	Purchases	Sales
2014		
Apr	2423	3825
May	1302	1658
Jun	535	642
Jul	532	484
Aug	524	461
Sep	741	407
Oct	2141	1265
Nov	5782	4461
Dec	6743	5473
2015		
Jan	9159	8170
Feb	10213	9696
Mar	5926	8068
Apr	2250	2957
May	769	1564
Jun	579	530
Jul	533	488
Aug	520	440
Sep	557	543
Oct	1673	931
Nov	3214	2020
Dec	4188	3447
2016		
Jan	8808	6757
Feb	6835	6242
Mar	3576	3476
Apr	2445	3537
May	1199	1117
Jun	504	568
Jul	498	462
Aug	1690	357
Sep	696	457
Oct		
Nov		
Dec		