

GERALD WUETCHER

DIRECT DIAL: (859) 231-3017 DIRECT FAX: (859) 258-3517 gerald.wuetcher@skofirm.com

500 WEST JEFFERSON STREET
SUITE 2000
LOUISVILLE, KY 40202-2828
MAIN: (502) 333-6000
FAX: (502) 333-6099

January 3, 2018

RECEIVED

Ms. Gwen Pinson, Esq.
Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, KY 40602-0615

JAN 03 2018

PUBLIC SERVICE COMMISSION

Re: Commercial Propane Service, LLC – Quarterly Gas Cost Recovery Report

Dear Ms. Pinson:

Pursuant to the Gas Cost Recovery Clause set forth in its filed rate schedules, Commercial Propane Service, LLC d/b/a Bright's Propane Service ("CPS") submits its Quarterly Report. Because of exceptional circumstances that are described below, this report covers the period from January 1, 2015 to October 31, 2017.

Background. CPS owns and operates a small propane gas distribution system, consisting of inground mains and service lines serving approximately 59 customers in the Old Bridge Subdivision of Boyle County, Kentucky. In February 1991, the Kentucky Public Service Commission ("KPSC") found that this system was a utility and subject to its jurisdiction. At that time, Bright's Propane Service, Inc. owned and operated the distribution system. It continued to operate this system until 2008. In February 2008, the KPSC approved the transfer of the distribution system to Heritage Operating L.P.² In January 2012, AmeriGas Partners L.P. acquired the system from Heritage Operating L.P. without prior KPSC approval. It obtained such approval in October 2013.³ On January 1, 2015, it transferred the system to CPS after obtaining KPSC approval of the transfer.⁴

Jurisdictional Status of Bright's Propane Service, Inc.'s Propane Distribution Service, Case No. 90-091 (Ky. PSC Feb. 15, 1991).

The Joint Application of Heritage Operating L.P., and Bright's Propane Service, Inc. for Approval of Transfer and Acquisition of Assets and Certificates of Public Convenience, Case No. 2007-00494 (Ky. PSC Feb. 27, 2008).

³ Application of AmeriGas Partners, L.P. and AmeriGas Propane, L.P. for Approval of the Acquisition of the Utility Assets of Heritage Operating, L.P. D/B/A Bright's Propane Service, Inc. and for Authority to Abandon the Pipeline System and Serve Customers By Other Means, Case No. 2013-00241 (Ky. PSC Oct. 11, 2013).

⁴ Joint Application of AmeriGas Partners, L.P. and Commercial Propane Service LLC for Approval of Commercial Propane Service LLC's Acquisition of AmeriGas Partners, L.P.'S Utility Assets in Old Bridge Subdivision, Danville, Kentucky, Case No. 2014-00250 (Ky. PSC Nov. 24, 2014).

Gwen Pinson, Esq. January 3, 2018 Page 2

KPSC records indicate that, outside of adjustments to reflect the cost of purchased gas, the KPSC has never reviewed the rates assessed for service provided by the distribution system. Since the KPSC has asserted jurisdiction over the distribution system, the rate for service has been based solely upon the wholesale delivered price of propane per cubic foot as adjusted quarterly for the purchase gas adjustment cost plus a charge of .015 cents per cubic foot for overhead. KPSC records indicate that Bright's Propane Service began filing quarterly gas cost recovery reports with the KPSC in 2000. Heritage Operating L.P. and AmeriGas Partners L.P continued this practice after each had acquired the distribution system. KPSC records, however, indicate that AmeriGas Partners L.P. ceased filing quarterly reports as of October 2013. The last gas cost recovery report filed with the KPSC reported the distribution system's gas purchases for the three month period ending April 30, 2013 and addressed expected sales for the three month period ending January 31, 2014.

When it acquired the distribution system, CPS was not fully cognizant of its responsibility to file quarterly gas cost recovery reports or to take the actions necessary for the preparation such reports. CPS is a limited liability company that Mr. Michael Roberts owns and operates. While Mr. Roberts has been involved in the propane business for more than three decades, neither he nor any of his employees had operated or managed a public utility. They were unfamiliar with the legal or regulatory requirements of such operation. Furthermore, despite assurances that AmeriGas and Commission Staff would assist CPS in meeting its regulatory responsibilities, such assistance was not forthcoming. As a result of its unfamiliarity with operating a public gas utility, CPS failed to submit the required reports and further failed to make monthly inventories of its propane volumes.⁷ CPS began taking monthly inventory readings of its propane stocks in February 2017.

CPS's gas cost recovery rate has three components: average gas cost component ("AGC"); actual adjustment ("AA"); and balance adjustment ("BA"). The AGC represents the average cost of gas supplies based on a measurement of gas remaining plus new supplies at the time of filling of main tank. The AA compensates for differences between the previous quarter's average gas cost and the actual cost of gas during that quarter. The BA compensates for any under or over collections which have occurred as a result of prior adjustments. Each component is reflected as a dollar per Mcf basis.

Current Report. The current report addresses the rate to be assessed from February 1, 2018 to April 30, 2018. Because no gas cost recovery reports have been filed since CPS's acquisition of the distribution system, CPS has calculated the gas cost recovery rate using actual operations for the period from January 1, 2015 to October 31, 2017.

Tariff of Bright's Propane Service, Inc. PSC No. 1, Original Sheet No. 1 (Ky. PSC effective Feb. 18, 1991).

⁶ Purchased Gas Adjustment Filing of Heritage Propane DBA Bright's Propane Service, Case No. 2013-00374 (Ky. PSC Nov. 14, 2013).

CPS acknowledges that the lack of assistance and CPS's lack of knowledge do not excuse its failure to comply with the requirements of its filed rate schedules. It respectfully submits, however, that these two factors should be considered in mitigation of any action that the KPSC may consider in light of CPS's failure to submit the required reports.

Gwen Pinson, Esq. January 3, 2018 Page 3

CPS assumes that the expected cost of gas for this period was \$30.52 per Mcf. It obtained this cost by subtracting the overhead component (\$.015 per cubic foot or \$15.00 per Mcf gas) from the KPSC-established gas cost rate of \$.04552 per cubic foot or \$45.52 per Mcf. CPS has assumed that the BA and AA components are \$0.00 as there are no billing records to support a different amount and since any differences in gas costs or any over- or under-collections prior to January 1, 2015 were the sole responsibility of its predecessor.

Because no inventory readings were taken prior to February 2017, CPS cannot determine on a monthly basis the cost of gas sold. It has instead determined the cost of gas sold using the average cost of gas purchased for the period January 1, 2015 to October 31, 2017. Attached to this report as Exhibit A are the invoices for all propane purchases during this period. As shown in Table 1, CPS purchased during this period a total of 83,422 gallons of propane at a total cost of \$73,947.20 or an average cost of \$1.128189 per gallon. When converted to cubic feet, CPS's average cost for the period is \$31.025 per Mcf. Using this average cost, CPS determined that the cost difference between the expected cost of gas and the cost of gas sold is \$0.505 per Mcf.

Table 2 reflects propane inventories from January 1, 2015 to October 31, 2017. As noted above, CPS did not begin making monthly inventory readings until February 2017. As of October 31, 2017, CPS had a propane inventory of 6,525 gallons. Subtracting total purchases from remaining propane inventory produces total sales of 76,897 gallons. When converted to cubic feet, total sales for the period are 2,796.2546 Mcf.¹² CPS has determined the difference in its expected cost of total gas sales from the actual cost of total gas sales to be \$1,412.11 by multiplying 2,796.2546 Mcf by \$0.505 per Mcf.

CPS has established the AGC for the period from February 1, 2018 to April 30, 2018 at \$31.025 per Mcf using the average cost for the period from January 1, 2015 to October 31, 2017. CPS determined the AA component by dividing the total cost difference in the period from January 1, 2015 to October 2017 by the estimated 12 month sales. Estimated 12 month sales were determined by dividing total sales for the period from January 1, 2015 to October 31, 2017 by 34

Total Gas Rate – Overhead Component = \$45.52 per Mcf - \$15.00 per Mcf = \$30.52 per Mcf.

⁹ Under the terms of the Purchase and Sale Agreement, CPS was to compensate AmeriGas L.P. for the inventory of propane in all storage tanks at the time of transfer. Readings of the storage tank levels were taken on December 31, 2014. A copy of these readings are found at Exhibit A.

This amount also includes approximately 1,700 gallons of propane that CPS added to the distribution system's storage tanks as a result of repair work performed on the distribution system. The cost of this propane is not known. As a proxy for the actual sale price of this propane, CPS has used the Energy Information Agency's Weekly U.S. Propane Wholesale price for March 27, 2017.

Total gallons sold = Gallons purchased - Remaining Inventory = 83,422 gallons - 6,525 gallons = 76,897 gallons.

 $^{76,897 \}text{ gallons} \div 27.5 \text{ gallons/Mcf} = 2,796.2546 \text{ Mcf}$

On November 8, 2017, CPS purchased an additional 8,787 gallons of propane at a price of \$1.1571 per gallon. Because the purchase was outside the period used to determine the adjustment, CPS has not used that price to determine the AGC. The later price suggests that the use of the average cost of \$1.128189 per gallon is reasonable and accurately reflects market conditions.

Gwen Pinson, Esq. January 3, 2018 Page 4

months and then multiplying by 12 months. This calculation resulted in estimated 12 month sales of 27,140.1176 gallons or 976.9 Mcf.¹⁴ Dividing the cost difference for sales during the period from January 1, 2015 to October 31, 2017 by estimated 12 month sales results in a current quarter AA of \$1.4455 per Mcf.¹⁵ There is no AA for prior quarters nor is there any BA component. The gas cost adjustment for the upcoming period, therefore, is \$47.4705 per Mcf.¹⁶

<u>Summary.</u> Pursuant to the Gas Cost Recovery Clause set forth in its filed rate schedules, CPS's rates for gas service must be revised to reflect its actual costs for propane for the period from January 1, 2015 to October 31, 2017. CPS proposes that its minimum rate be adjusted to \$18.99 for the first 400 cubic feet of usage and that all usage above 400 cubic feet be charged a rate of .04747 per cubic foot. While this adjustment is based upon CPS's gas sales and purchases for the period from January 1, 2015 to October 31, 2017, its next gas cost recovery will be based upon gas sales and purchases for the three-month period ending January 31, 2018.

If Commission Staff has any questions regarding this report or requires additional documents, please contact me.

Very truly yours,

Stoll Keenon Ogden PLLC

Gerald Wuetcher

GEW Enclosures

Cc: Office of Rate Intervention

76,897 gallons \div 34 months = 2,261.67647 gallons per month. 2,261.67647 gallons per month x 12 months = 27,140.1176 gallons per year. 27,140.1176 gallons per year \div 27.5 gallons per Mcf = 986.9 Mcf per year.

Total Cost Difference ÷ Estimated 12 month sales = \$1,412.11 ÷ 986.9 Mcf = \$1.4455 Mcf

Expected Cost in Mcf \$31.0250
Actual Adjustment in Mcf \$1.4455
Overhead in Mcf \$15.0000
Gas Cost Adjustment in Mcf \$47.4705

TABLE 1

Date	Gallons Purchased	Cost (\$)	Total Cost (\$)	Remarks
12/31/2014	8375	0.8538	7150.575	Inventory level at time of transfer. Cost of propone identified in purchase price.
01/10/2015	9401	1.3525	12714.850	
03/09/2015	9200	0.8690	7994.800	
11/23/2015	9557	1.3525	12925.840	
01/09/2016	9365	0.6060	5675.190	
02/10/2016	9401	0.6165	5795.717	
10/13/2016	9074	0.7555	6855.407	
12/29/2016	8542	0.8900	7602.380	
04/30/2017	1700	0.6720	1142.400	Estimated amount of propane added due to repair work; cost of propane unknown; used EIA Weekly U.S. Propane Wholesale price for 3/27/2017
07/06/2017	8807	0.6915	6090.041	
Total	83422		73947.200	
Average Cost	: \$1.128129 p	oer gallon		

TABLE 2

Date		Old Bridge 1: 18,000		gsridge K: 1,000		riarcliff K: 1,000		riarcliff X: 500	Total Remaining
	Gallons	Percentage	Gallons	Percentage	Gallons	Percentage	Gallons	Percentage	
12/31/2014	7200	40	400	40	500	50	275	55	8,375
01/31/2017	9000	50	750	75	750	75	400	80	10,900
02/28/2017	6300	35	640	64	600	60	375	75	7,915
03/31/2017	2700	15	450	45	430	43	340	68	3,920
04/30/2017	3420	19	350	35	320	32	310	62	4,400
05/31/2017	2520	14	280	28	300	30	290	58	3,390
06/30/2017	1800	10	220	22	150	15	250	50	2,420
08/31/2017	7200	40	700	70	700	70	390	78	8,990
09/30/2017	6480	36	700	70	650	65	360	72	8,190
10/31/2017	5040	28	560	56	600	60	325	65	6,525

EXHIBIT A

Old Bridge Tank inventory as of 12/31/14

Size	Location	%	Gallons	Cost	Total Cost
1000	680 Kings Ridge, Danville, Ky.	40%	400	0.84209	336.836
1000	322 Briarcliff Rd. Danville, Ky.	50%	500	0.84209	421.045
500	330 Briarcliff Rd. Danville, Ky.	55%	275	0.84209	231.57475
18000	Storage Old Bridge	40%	7200	0.8558	6161.76
			Total		\$7,151.22

Total Gas Cost \$7,151.22 Asset Cost 5,000.00

Check Total \$12,151.22





Invoice Number: JAN-76481

Invoice Date:

Jan 10, 2015

P O BOX 711747

CINCINNATI OH 45271-1747 Fax:

Voice:

513-271-1460 513-271-1490

Bill To:

COMMERCIAL PROPANE SERVICE 160 SULPHER SPRINGS RD LEBANON, KY 40033

Ship to:

COMMERCIAL PROPANE SERVICE LEBANON, KY

USA

Custon	nerID	BOL#	Payment Terms	
COMLEB 15-91030		15-91030	NET 10 DAYS	
Sales R	Rep ID	Shipping Method	Ship Date	Due Date
RE		US MAIL	1/10/15	1/20/15
Quantity	Item	Description	Unit Price	Amount
9,401	56-14	COMMERCIAL PROPANE	1,3465000	12,658.45
9,401	FEDTAX	PERC TAX - NATIONAL	0.0040000	37.60
9,401	KYDTAX	KENTUCKY PROPANE PERC TAX	0.0020000	18.80
				1

Quantity Item Description Unit Price 9,401 56-14 COMMERCIAL PROPANE 1,346500 9,401 FEDTAX PERC TAX - NATIONAL 0.004000	Amount
9.401 FEDTAX PERC TAX - NATIONAL 0.004000	12,658.45
	37.60
9,401 KYDTAX KENTUCKY PROPANE PERC TAX 0.002000	18.80
9,401 DEPOSIT DEPOSIT 0.100000	-940.10
P.O. 56-14	



CELEBRATING Promotiv 1991-2014 YEARS

Subtotal	11,774.75
Sales Tax	
Total Invoice Amount	11,774.75
Payment/Credit Applied	
TOTAL	11,774.75

Check/Credit Memo No:



Invoice Number: MAR-77855 Invoice Date:

Mar 9, 2015

P O BOX 711747

CINCINNATI OH 45271-1747

Voice:

513-271-1460

Fax:

513-271-1490

Bill To:

COMMERCIAL PROPANE SERVICE 160 SULPHER SPRINGS RD LEBANON, KY 40033

Ship to:

COMMERCIAL PROPANE SERVICE LEBANON, KY

USA

Custom	erID	BOL#	Payment Terms		
COMLEB		15-93387	NET 10 DAY	'S	
Sales R	ep ID	Shipping Method	Ship Date	Due Date	
RE		US MAIL	3/9/15 3/19/15		
Quantity	Item	Description	Unit Price	Amount	
9,200	SPOT	PROPANE	0.8630000	7,939.60	
9,200	FEDTAX	PERC TAX - NATIONAL	0.0040000	36.80	
9,200	KYDTAX	KENTUCKY PROPANE PERC TAX	0.0020000	18.40	
		P.O. spot			
		N			
			the last		
			VIX		
		01/V1/01/02:	n(K		
		1	Me 115		

CELEBRATING Promptly **YEARS** 1991-2014

Subtotal	7,994.80
Sales Tax	
Total Invoice Amount	7,994.80
Payment/Credit Applied	
TOTAL	7,994.80

Check/Credit Memo No:



Invoice Number: NOV-80618

Invoice Date:

Nov 23, 2015

P O BOX 711747

CINCINNATI OH 45271-1747

Voice: Fax:

513-271-1460 513-271-1490

Bill To:

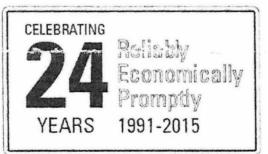
COMMERCIAL PROPANE SERVICE 160 SULPHER SPRINGS RD LEBANON, KY 40033

Ship to:

COMMERCIAL PROPANE SERVICE LEBANON, KY

USA

Customer ID COMLEB		tomer ID BOL#		ms
		15-01778	NET 10 DAYS	
Sales R	ep ID	Shipping Method	Ship Date	Due Date
RE		US MAIL	11/23/15	12/3/15
Quantity	Item	Description	Unit Price	Amount
9,557	56-14	COMMERCIAL PROPANE	1.3465000	12,868.50
9,557	FEDTAX	PERC TAX - NATIONAL	0.0040000	38.23
9,557	KYDTAX	KENTUCKY PROPANE PERC TAX	0.0020000	19.11
9,557	DEPOSIT	DEPOSIT	0.1000000	-955.70
		P.O. 56-14		



TOTAL	11,970.14
Payment/Credit Applied	
Total Invoice Amount	11,970.14
Sales Tax	
Subtotal	11,970.14



Invoice Number: JAN-81264 Invoice Date: Jan 9, 2016

P O BOX 711747

ty the

CINCINNATI OH 45271-1747 Fax:

Voice:

513-271-1460

513-271-1490

* ##\$

Bill To:

COMMERCIAL PROPANE SERVICE 160 SULPHER SPRINGS RD LEBANON, KY 40033

Ship to:

COMMERCIAL PROPANE SERVICE

DANVILLE, KY

USA



Custom	Customer ID BQL# COMLEB 16-99096		Payment	Terms
COML			NET 10 DAYS	
Sales R	ep ID	Shipping Method	Ship Date Due Dat	
RE		US MAIL	1/9/16	1/19/16
Quantity	Item	Description	Unit Price	Amount
9,365	SPOT	PROPANE	0,59460	5,568.4
9,365	FEDTAX	PERC TAX - NATIONAL	0.00400	00 37.46
9,365	KYDTAX	KENTUCKY PROPANE PERC TAX	0.00200	18.7
		P.O. Spot		

CELEBRATING Reliably Economically Promptly 1991-2015 **YEARS**

Subtotal	5,624,62
Sales Tax	
Total Invoice Amount	5,624.62
Payment/Credit Applied	
TOTAL	5,624.62



Invoice Number: FEB-82116 Invoice Date:

Feb 10, 2016

P O BOX 711747

CINCINNATI OH 45271-1747

Voice:

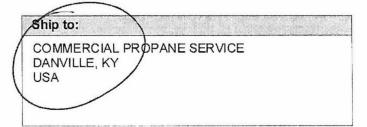
513-271-1460

Fax:

513-271-1490

Bill To:

COMMERCIAL PROPANE SERVICE 160 SULPHER SPRINGS RD LEBANON, KY 40033



Customer ID COMLEB Sales Rep ID		BOL#	Payment Terr	Payment Terms			
		16-099773	NET 10 DAYS				
		Shipping Method	Ship Date	Due Date			
SA	N	US MAIL	2/10/16	2/20/16			
Quantity Item		Description	Unit Price	Amount			
9,401	SPOT	PROPANE	0.6105000	5,739.3			
9,401	FEDTAX	PERC TAX - NATIONAL	0.0040000	37.6			
9,401	KYDTAX	KENTUCKY PROPANE PERC TAX P.O. spot-Adrian	0.0020000	18.8			

CELEBRATING Reliably Economically Promptly YEARS 1991-2016

Subtotal	5,795.71
Sales Tax	
Total Invoice Amount	5,795.71
Payment/Credit Applied	
TOTAL	5,795.71



INVOICE

Invoice Number: OCT-84277 Invoice Date: Oct 13, 2016

P O BOX 711747

Voice:

513-271-1460

CINCINNATI OH 45271-1747

Fax:

513-271-1490

Bill To:

COMMERCIAL PROPANE SERVICE 160 SULPHER SPRINGS RD LEBANON, KY 40033 Ship to:

COMMERCIAL PROPANE SERVICE

DANVILLE, KY

USA

Customer ID COMLEB		BOL#	Payment Terr	Payment Terms			
		16-587	NET 10 DAYS				
Sales Rep	o ID	Shipping Method	Ship Date	Due Date			
SA		US MAIL	10/13/16	10/23/16			
Quantity	Item	Description	Unit Price	Amount			
9,047 SPOT		PROPANE	0.7495000	6,780.73			
9,047 FEDTAX		PERC TAX - NATIONAL	0.0040000	36.19			
9.047 KYDTAX		KENTUCKY PROPANE PERC TAX	0.0020000	18.09			
	A 4	P.O. Spot	MIX				

9074 gallons

celebrating Reliably Economically

Promptiv

YEARS 1991-2016

on Statement as \$ 6855.41

Subtotal	6,835.04
Sales Tax	
Total Invoice Amount	6,835.01
Payment/Credit Applied	
TOTAL	-6,835.01



Invoice Number: DEC-85294 Invoice Date:

Dec 29, 2016

P O BOX 711747

CINCINNATI OH 45271-1747 Fax:

Voice:

513-271-1460

513-271-1490

Bill To:

COMMERCIAL PROPANE SERVICE 160 SULPHER SPRINGS RD LEBANON, KY 40033

Ship to:

COMMERCIAL PROPANE SERVICE DANVILLE, KY

USA

Customer ID COMLEB Sales Rep ID SA		BOL#	Payment Terms NET 10 DAYS			
		16-106269				
		Shipping Method	Ship Date	Due Date 1/8/17		
		US MAIL	12/29/16			
Quantity	Item	Description	Unit Price	Amount		
8,542	SPOT	PROPANE	0.8835000	7,546.86		
8,542	FEDTAX	PERC TAX - NATIONAL	0.0045000	38.44		
8,542	KYDTAX	KENTUCKY PROPANE PERC TAX	0.0020000	17.08		
	AN.	eed paperwork out of mailbux out of mailbux out of Danvelle				

CELEBRATING YEARS 1991-2016

TOTAL	7,602.38
Payment/Credit Applied	
Total Invoice Amount	7,602.38
Sales Tax	
Subtotal	7,602.38



Invoice 201396

Sold To:

Commercial Propane Services

Adrian Roberts

160 Sulphur Springs Road

Lebanon, KY 40033

Customer Number :

1075

Contract Number:

RPH-119637

Product:

Propane

Invoice Date:

7/6/2017

Payment Terms:

Net 10 Days from Invoice Date

Invoice Due Date:

7/16/2017

Phone:

270-699-9437

Wire Remittance : BBK (Beneficiary

US Bank

Milwaukee, WI USA

ABA/Routing # 101000187

BFN (Beneficiary):

Alliance Energy Services, LLC

Account # 145592475571

Check Remittance

Alliance Energy Services, LLC

Box 78221

Milwaukee, WI 53278-8221

Description	PO Number	Lift Date	<u>Origin</u>	Destination	<u>Volume</u>	<u>Unit</u>	Price	<u>Unit</u>	Total Amount
157362		06/29/17	Tuscola, I	Danville,	8,807	Gals	0.68500	Gals	\$6,032.79
Kentucky Perc Fee		06/29/17	Tuscola, I	Danville,	8,807	Gals	0.00200	Gats	\$17.61
US PERC 2		06/29/17	Tuscola, I	Danville,	8,807	Gals	0.00450	Gals	\$39.63

Total Volume 8,807 Total Amount Due \$6,090.03

We Appreciate Your Business!!

The EFT date will be on the due date or next business day.

NOTE: If you are not an EFT Customer, and would like to be, please contact the Alience Contract Administrator at 816-421-5192

Alliance Energy

318 Armour Road

North Kansas City, MO 64116