



GERALD WUETCHER
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SUITE 2000
LOUISVILLE, KY 40202-2828
MAIN: (502) 333-6000
FAX: (502) 333-6099

January 5, 2018

RECEIVED

JAN 5 2018

PUBLIC SERVICE
COMMISSION

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

**Re: Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc.
Quarterly Gas Cost Recovery Report (Amended)
Case No. 2018-00006**

Dear Ms. Pinson:

Commercial Propane Service, LLC d/b/a Bright's Propane Service ("CPS") submits this Amended Quarterly Gas Cost Recovery Report for the period from January 1, 2015 to October 31, 2017. On January 3, 2018, CPS submitted its original report for this period. Commission Staff subsequently advised CPS of a computational error that significantly affected the report's findings and proposals. This amended report replaces the original report, corrects the computational errors in the earlier report, and revises CPS's proposal in light of those corrections.

Background. CPS owns and operates a small propane gas distribution system, consisting of in-ground 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.¹ 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

¹ *Jurisdictional Status of Bright's Propane Service, Inc.'s Propane Distribution Service*, Case No. 90-091 (Ky. PSC Feb. 15, 1991).

² *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).

such approval in October 2013.³ On January 1, 2015, it transferred the system to CPS after obtaining KPSC approval of the transfer.⁴

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.⁵ KPSC records indicate that Bright's Propane Service began filing quarterly gas cost recovery reports with the KPSC in 2000.⁶ 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

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).

⁵ *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).

⁷ 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.

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.

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.⁸ 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 2017,⁹ 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 **\$0.8864 per gallon**.¹⁰ When converted to cubic feet, CPS's average cost for the period is **\$24.38 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 **\$6.14 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.¹¹ 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 is **(\$17,169.00)** by multiplying 2,796.2546 Mcf by (\$6.14) per Mcf.

⁸ 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.

¹⁰ 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.

¹¹ Total gallons sold = Gallons purchased – Remaining Inventory = 83,422 gallons – 6,525 gallons = 76,897 gallons.

¹² 76,897 gallons ÷ 27.5 gallons/Mcf = 2,796.2546 Mcf

Given the size of the total cost difference and the significant financial hardship that CPS would incur if required to make a refund through the AA component,¹³ CPS proposes that the total cost difference be refunded as a separate line item over a period of 34 months at the rate of \$6.14 per Mcf or .00614 per cubic foot. CPS determined the refund rate by dividing the amount over-collected by the volume of propane sold during the 34-month period in which the over-collection occurred and then converting to Mcf.¹⁴ CPS proposes to report in its future gas cost recovery quarterly reports the amount refunded each month of the reporting period and the cumulative amount refunded. When the remaining over-collected amount is too small to be refunded through a separate line item, it will be rolled into either the AA or BA component, whichever the Commission finds most appropriate. This refunding method is consistent with past Commission practice of requiring unusual underpayments or over-collections to be paid or refunded over the period in which underpayment or over-collection occurred to avoid financial hardships.¹⁵ Please note that CPS has been operating the Bright's Propane distribution system at a financial loss for some time and that the proposed refund will create greater financial hardship. Please also note that during the period in which CPS has operated the distribution system, CPS has received no customer complaints regarding the reasonableness of its rates for service.

CPS has established the AGC for the period from February 1, 2018 to April 30, 2018 at **\$31.82 per Mcf** using the cost of its most recent purchase of propane.¹⁶ There is no AA for current or prior quarters nor is there any BA component. The gas cost adjustment for the upcoming period, therefore, is **\$46.03 per Mcf**.¹⁷

Summary. 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 **\$18.41 for the first 400 cubic feet of usage** and that all usage above 400 cubic feet be charged a rate of **.04603 per cubic foot**. CPS further proposes to establish a refund component of **.00614 per cubic foot** to refund \$17,169 of collections exceeding actual gas costs. This refund component would continue until the full amount is refunded or is rolled into either the AA or BA component. While the proposed 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.

¹³ The overcollection amount represents 36.4 percent of CPS's total gas revenue operating revenues for the year ending December 31, 2016. *Report of Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc. to the Kentucky Public Service Commission for the Year Ending December 31, 2016* at Ref Page 9.

¹⁴ $\$17,169 \div 76,897 \text{ gallons} = \$0.22327 \text{ per gallon}$. $\$0.22327 \text{ per gallon} \times 27.5 \text{ gallons per Mcf} = \6.14 per Mcf .

¹⁵ See, e.g., *Purchased Gas Adjustment Filing of Western Lewis-Rectorville Water and Gas*, Case No. 2017-00106 (Ky. PSC May 16, 2017) (finding a four year refund period reasonable in view of potential effects on gas utility). See also 807 KAR 5:006, Section 11(2) (regarding billing adjustments for slow meters).

¹⁶ On November 8, 2017, CPS purchased an additional 8,787 gallons of propane at a price of \$1.1571 per gallon. A copy of the invoice for this purchase is attached as Exhibit B to this amended report.

¹⁷

Expected Cost in Mcf	\$31.0250
Overhead in Mcf	<u>\$15.0000</u>
Gas Cost Adjustment in Mcf	\$46.0250

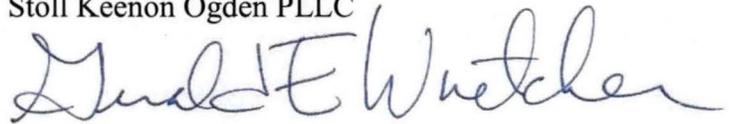
Gwen Pinson, Esq.
January 5, 2018
Page 5

Finally, CPS has recently applied for a general rate adjustment of its rates.¹⁸ Given CPS's worsening financial condition and the refund required by CPS's gas cost recovery rate, it is imperative that the Commission promptly review and rule upon CPS's application for rate adjustment to ensure CPS's ability to provide safe and reliable service.

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

Very truly yours,

Stoll Keenon Ogden PLLC

A handwritten signature in blue ink that reads "Gerald Wuetcher". The signature is written in a cursive style with a large initial "G".

Gerald Wuetcher

GEW
Enclosures
Cc: Office of Rate Intervention

¹⁸ *Electronic Application of Commercial Propane Service, Llc D/B/A Bright's Propane Service, Inc. For An Alternative Rate Adjustment*, Case No. 2017-00343 (Ky. PSC filed Dec. 6, 2017).

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 propane 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: \$0.8864 per gallon				

TABLE 2

Date	Storage Old Bridge MAX: 18,000		Kingsridge MAX: 1,000		322 Briarcliff MAX: 1,000		330 Briarcliff MAX: 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



OLD
BRIDGE

INVOICE

Invoice Number: JAN-76481
 Invoice Date: Jan 10, 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

Customer ID		BOL #		Payment Terms	
COMLEB		15-91030		NET 10 DAYS	
Sales 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	
9,401	DEPOSIT	DEPOSIT P.O. 56-14	0.1000000	-940.10	

CELEBRATING
23 Reliably
 Economically
 Promptly
 YEARS 1991-2014

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

Check/Credit Memo No:

INVOICE PAGE 3 of 9



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

Customer ID	BOL #	Payment Terms	
COMLEB	15-93387	NET 10 DAYS	
Sales Rep 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		

paid out of DB acc. w/ check #1 4/6/15



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

Check/Credit Memo No:

FINANCE CHARGE OF 1.5% PER MONTH ON LATE PAYMENTS

INVOICE

Invoice Number: NOV-80618
 Invoice Date: Nov 23, 2015



P O BOX 711747
 CINCINNATI OH 45271-1747

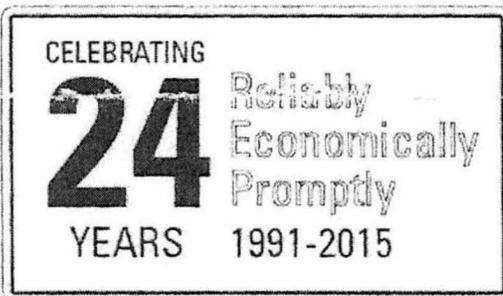
Voice: 513-271-1460
 Fax: 513-271-1490

Bill To:
 COMMERCIAL PROPANE SERVICE
 160 SULPHER SPRINGS RD
 LEBANON, KY 40033

Ship to:
 COMMERCIAL PROPANE SERVICE
 LEBANON, KY
 USA
OLD BRIDGE

Customer ID	BOL #	Payment Terms	
COMLEB	15-01778	NET 10 DAYS	
Sales Rep 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 P.O. 56-14	0.1000000	-955.70



**PLEASE INCLUDE
 INVOICE NUMBER
 WITH YOUR PAYMENT**

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

FINANCE CHARGE OF 1.5% PER MONTH ON LATE PAYMENTS



INVOICE

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

P O BOX 711747
 CINCINNATI OH 45271-1747

Voice: 513-271-1460
 Fax: 513-271-1490

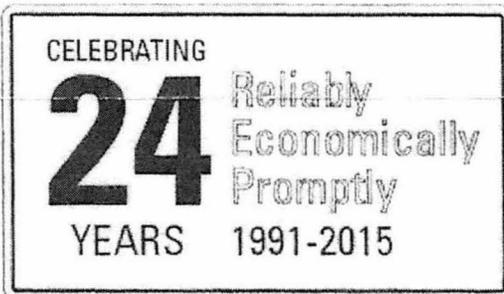
Bill To:
 COMMERCIAL PROPANE SERVICE
 160 SULPHER SPRINGS RD
 LEBANON, KY 40033

Ship to:
 COMMERCIAL PROPANE SERVICE
 DANVILLE, KY
 USA



Customer ID	BOL #	Payment Terms	
COMLEB	16-99096	NET 10 DAYS	
Sales Rep ID	Shipping Method	Ship Date	Due Date
RE	US MAIL	1/9/16	1/19/16

Quantity	Item	Description	Unit Price	Amount
9,365	SPOT	PROPANE	0.5946000	5,568.43
9,365	FEDTAX	PERC TAX - NATIONAL	0.0040000	37.46
9,365	KYDTAX	KENTUCKY PROPANE PERC TAX	0.0020000	18.73
		P.O. Spot		

**PLEASE INCLUDE
 INVOICE NUMBER
 WITH YOUR PAYMENT**

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

FINANCE CHARGE OF 1.5% PER MONTH ON LATE PAYMENTS



INVOICE PAGE 6 of 9

Invoice Number: FEB-82116
 Invoice Date: Feb 10, 2016

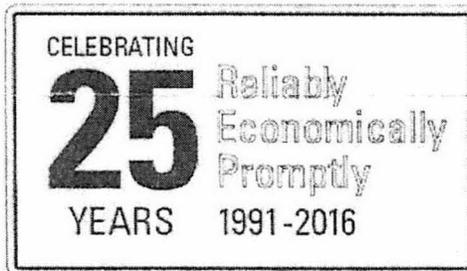
P O BOX 711747
 CINCINNATI OH 45271-1747

Voice: 513-271-1460
 Fax: 513-271-1490

Bill To:
 COMMERCIAL PROPANE SERVICE
 160 SULPHER SPRINGS RD
 LEBANON, KY 40033

Ship to:
 COMMERCIAL PROPANE SERVICE
 DANVILLE, KY
 USA

Customer ID		BOL #		Payment Terms	
COMLEB		16-099773		NET 10 DAYS	
Sales Rep ID		Shipping Method		Ship Date	Due Date
SA		US MAIL		2/10/16	2/20/16
Quantity	Item	Description		Unit Price	Amount
9,401	SPOT	PROPANE		0.6105000	5,739.31
9,401	FEDTAX	PERC TAX - NATIONAL		0.0040000	37.60
9,401	KYDTAX	KENTUCKY PROPANE PERC TAX		0.0020000	18.80
		P.O. spot-Adrian			



**PLEASE INCLUDE
 INVOICE NUMBER
 WITH YOUR PAYMENT**

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

FINANCE CHARGE OF 1.5% PER MONTH ON LATE PAYMENTS



INVOICE PAGE 7 of 9

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

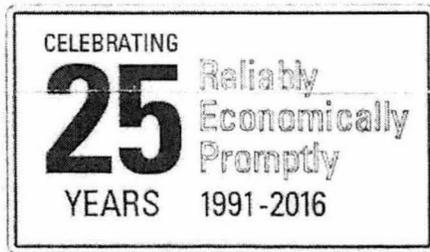
Ship to:
 COMMERCIAL PROPANE SERVICE
 DANVILLE, KY
 USA

Customer ID	BOL #	Payment Terms	
COMLEB	16-587	NET 10 DAYS	
Sales Rep 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
		P.O. Spot		

9074 gallons

OB rebilled and accidentally tossed



On statement as \$6855.41

PLEASE INCLUDE INVOICE NUMBER WITH YOUR PAYMENT

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

FINANCE CHARGE OF 1.5% PER MONTH ON LATE PAYMENTS



*technically
2017*

INVOICE PAGE 8 of 9

Invoice Number: DEC-85294
 Invoice Date: Dec 29, 2016

P O BOX 711747
 CINCINNATI OH 45271-1747

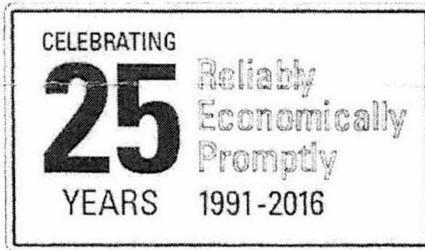
Voice: 513-271-1460
 Fax: 513-271-1490

Bill To:
 COMMERCIAL PROPANE SERVICE
 160 SULPHER SPRINGS RD
 LEBANON, KY 40033

Ship to:
 COMMERCIAL PROPANE SERVICE
 DANVILLE, KY
 USA

Customer ID		BOL #		Payment Terms	
COMLEB		16-106269		NET 10 DAYS	
Sales Rep ID		Shipping Method		Ship Date	Due Date
SA		US MAIL		12/29/16	1/8/17
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
		P.O. spot			

* Need paperwork
 out of mailbox
 @ Danville



**PLEASE INCLUDE
 INVOICE NUMBER
 WITH YOUR PAYMENT**

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

FINANCE CHARGE OF 1.5% PER MONTH ON LATE PAYMENTS



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
Fax :

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	Origin	Destination	Volume	Unit	Price	Unit	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	Gals	\$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 Alliance Contract Administrator at 816-421-5192

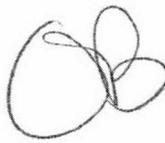
Alliance Energy

318 Armour Road

North Kansas City, MO 64116

Past Due Invoices May Be Subject To A 1.5% Interest Charge Per Month.

EXHIBIT B



INVOICE

Invoice Number: NOV-88048

Invoice Date: Nov 8, 2017

P O BOX 711747
CINCINNATI OH 45271-1747

Voice: 513-271-1460

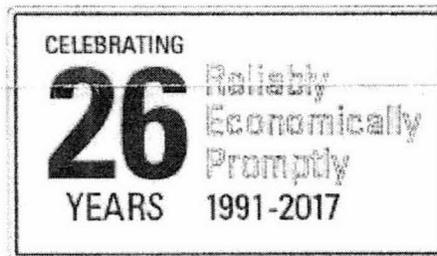
Fax: 513-271-1490

Bill To:
COMMERCIAL PROPANE SERVICE
160 SULPHER SPRINGS RD
LEBANON, KY 40033

Ship to:
COMMERCIAL PROPANE SERVICE
DANVILLE, KY
USA

Customer ID	BOL #	Payment Terms	
COMLEB	17-112226	NET 10 DAYS	
Sales Rep ID	Shipping Method	Ship Date	Due Date
SA	US MAIL	11/8/17	11/18/17

Quantity	Item	Description	Unit Price	Amount
8,787	SPOT	PROPANE	1.1501000	10,105.93
8,787	FEDTAX	PERC TAX - NATIONAL	0.0050000	43.94
8,787	KYDTAX	KENTUCKY PROPANE PERC TAX	0.0020000	17.57
		P.O. spot		



**PLEASE INCLUDE
INVOICE NUMBER
WITH YOUR PAYMENT**

Subtotal	10,167.44
Sales Tax	
Total Invoice Amount	10,167.44
Payment/Credit Applied	
TOTAL	10,167.44

FINANCE CHARGE OF 1.5% PER MONTH ON LATE PAYMENTS