



1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS, AND ON WHOSE**  
2 **BEHALF YOU ARE TESTIFYING.**

3 A. I am James L. Crist, President of Lumen Group, Inc. a consulting firm focused on  
4 regulatory and market issues. My business address is 4226 Yarmouth Drive, Suite 101,  
5 Allison Park, Pennsylvania 15101. I am presenting testimony on behalf of The  
6 Pennsylvania State University ("Penn State" or "PSU").

7  
8 **Q. DO YOU HAVE ANY QUALIFICATIONS OR OTHER SPECIALIZED**  
9 **KNOWLEDGE THAT WOULD ASSIST THE PENNSYLVANIA PUBLIC**  
10 **UTILITY COMMISSION ("COMMISSION") IN ITS DELIBERATIONS IN THIS**  
11 **CASE?**

12 A. Yes.

13  
14 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

15 A. I have a B.S. in Chemical Engineering from Carnegie Mellon University and an MBA from  
16 the University of Pittsburgh. Additionally, I am a Registered Professional Engineer in the  
17 Commonwealth of Pennsylvania.

18  
19 **Q. BRIEFLY DESCRIBE YOUR RELEVANT BUSINESS QUALIFICATIONS.**

20 A. I have run a consulting practice for the past 20 years focused on regulated and deregulated  
21 energy company strategy, market strategy, and regulatory issues. During 2004 and 2005, I  
22 undertook a consulting assignment as the Vice President of Consumer Markets for ACN  
23 Energy. ACN is a gas and electric marketer that is active in eight states. Prior to my

1 consulting practice, I worked at three major energy companies for a total of 19 years. Most  
2 recently I was Vice President of Marketing for Equitable Resources. In that function I was  
3 responsible for the development of the company's deregulated business strategy.

4 Prior to that I was Vice President of Marketing for Citizens Utilities, responsible  
5 for gas, electric, water and wastewater marketing activities in several service territories  
6 within the United States. The gas and electric utility operations were in Vermont,  
7 Louisiana, Arizona, Colorado, and Hawaii. Under my direction, Citizens initiated  
8 commercial and industrial transportation and supply services at its gas operation in  
9 Arizona. I also directed significant gas supply contracting activities with large industrial  
10 and commercial customers in Citizens' gas operation in Louisiana.

11 Before that, during 1988 through 1994, I was the Marketing Director at the Peoples  
12 Natural Gas Company where I was actively involved in many gas transportation programs  
13 as the company relaxed transportation requirements so that customers would have supply  
14 choices.

15 In summary, I have considerable experience in several states involving residential,  
16 commercial, and industrial customer energy procurement, regulatory issues and industry  
17 restructuring programs.

18  
19 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PENNSYLVANIA**  
20 **PUBLIC UTILITY COMMISSION?**

21 **A.** Yes, I have appeared before the Commission in numerous gas and electric regulatory  
22 proceedings. I have been involved in the previous base rate cases of Columbia Gas of  
23 Pennsylvania, Inc. ("Columbia," "CPA," or the "Company") filed in 2008, 2009, 2010, 2012.

1 2014, 2015 and 2016 and in its 2017 purchased gas cost case. Additionally, I provided  
2 testimony on a variety of issues relating to energy procurement, industry restructuring, and  
3 demand response before regulatory Commissions in Arizona, Maryland, New Mexico,  
4 Illinois and the U.S. Virgin Islands.

5  
6 **I. ISSUES**

7 **Q. WHAT ARE THE ISSUES YOU WILL DISCUSS IN THIS TESTIMONY?**

8 **A.** Specifically, in my direct testimony I will:

- 9 1. Raise concerns regarding the overall increase of \$46.9 million dollars which is  
10 another in a string of never ending rate hikes Columbia (eight over the past decade).  
11 I will recommend a reduction in the overall rate of return by demonstrating that  
12 Columbia's risk, which it incorporates into its request for a higher cost of equity, is  
13 actually lower and not higher as Columbia claims.
- 14 2. Show how Columbia is discriminating against customers that do not obtain gas from  
15 Columbia over those customers that choose to transport gas provided by gas  
16 marketers by its use of flow orders. I will propose needed changes to Columbia's  
17 existing flow order policies and procedures because the existing way that Columbia  
18 handles the issuance of flow orders places Columbia's retail gas sales operation in a  
19 favored position over customers who obtain gas supplies from independent  
20 marketers. I will review existing tariff language that covers flow orders, discuss the  
21 principles that underlay the reasons for flow orders, review the nondiscriminatory  
22 policy that the PUC has for gas distribution utilities, and present data for the past  
23 heating season showing Columbia's flow order behavior and the harm it has done to

1 General Delivery Service customers such as PSU. Columbia's behavior benefits the  
2 Company and disadvantages General Distribution Service ("GDS") customers that  
3 purchase gas from competitive suppliers and revisions to the tariff flow order rules  
4 are necessary to create a level playing field.

- 5 3. Recommend that a portion of the revenue increase assigned to the LDS class be  
6 assigned to non-competitive customers of all classes because 50.8% of the LDS class  
7 volumes are flex customers under set contracts and thus are not subject to revenue  
8 increases.

9  
10 **II. PENN STATE SERVICE**

11 **Q. WOULD YOU BRIEFLY DESCRIBE PENN STATE'S SERVICE FROM**  
12 **COLUMBIA?**

13 **A.** Yes. Penn State is a major sales and distribution service customer of Columbia at the  
14 University Park campus and at the Beaver, Fayette, Mont Alto, and York Campuses and  
15 Biglerville Ag Extension Farm within the Commonwealth. In 2017, Penn State received  
16 2,184,350 Dth through distribution service from Columbia. At the University Park campus  
17 PSU takes service from two primary accounts. The two campus steam plants, including a  
18 combustion turbine-generator with a heat recovery steam generator, are serviced from three  
19 meters representing about 92% of the campus load and make up one account. A variety of  
20 campus buildings that are served from about 50 meters, representing about 8% of the  
21 campus load, make up the other account.

22

1 **Q. WHAT PIPELINES DELIVER GAS TO THE COLUMBIA DISTRIBUTION**  
2 **SYSTEM THAT SERVES THE UNIVERSITY PARK CAMPUS OF PENN STATE?**

3 A. The State College area and other areas of Centre County receive gas that flows into the  
4 Columbia distribution system through three Points of Delivery (“PODs”) from interstate  
5 pipelines. The first is distribution pipe D-10018 known as the Snowshoe Lateral that  
6 connects to the Columbia Gas Transmission’s (“CPG”) pipeline at the Snowshoe POD.  
7 That pipeline has served the State College area and Penn State’s University Park campus  
8 in State College and its vicinity for decades. Columbia will abandon the Snowshoe Lateral  
9 on June 30, 2018.

10

11 **Q. PLEASE DESCRIBE THE OTHER TWO PIPELINES THAT ALSO SUPPLY**  
12 **UNIVERSITY PARK AND CENTRE COUNTY.**

13 A. East of State College about eight miles are two interstate pipelines, Dominion Transmission  
14 (“Dominion” or “DTI”) and Texas Eastern (“TETCO”). To prepare for the closing of the  
15 Snowshoe Lateral on June 30, 2018, PSU now contracts for all of its gas supply through  
16 Dominion.

17

18 **III. COLUMBIA’S REQUEST OF \$46.9 MILLION**

19 **Q. WHEN DID COLUMBIA LAST INCREASE ITS BASE RATES?**

20 A. The Order in Columbia’s most recent base rate case (Docket R-2016-2529660) was entered  
21 on October 27, 2016. The Company was awarded an increase of \$35,000,000. It had  
22 requested \$55.3 million. Columbia has increased its base rates frequently during the past

1 decade as shown in this table which indicates the amount it filed for and the result of the  
2 settlements in each case.

3 **Table 1: Columbia Rate filings**

<b>Docket No.</b>	<b>Test Year Ending</b>	<b>Proposed Increase (\$Millions)</b>	<b>Settlement (\$Millions)</b>	<b>%</b>
R-2008-2011621	Sep-08	\$58.9	\$41.7	70.8%
R-2009-2149262	Sep-10	\$32.3	\$12.0	37.2%
R-2010-2215623	Sep-11	\$37.8	\$17.0	45.0%
R-2012-2321748	Jun-14	\$77.3	\$55.2	71.4%
R-2014-2406274	Dec-15	\$54.1	\$32.5	60.1%
R-2015-2469665	Dec-16	\$46.0	\$27.1	58.9%
R-2016-2529660	Dec-17	\$55.3	\$35.0	63.3%
R-2018-2647577	Dec-19	\$46.9		

4 Prior to the filing in 2008, Columbia had not filed a base rate case since 1995, running its  
5 business for a 13-year period without increasing base rates. Now it is back for yet another  
6 proposed increase of \$46.9 million.

7  
8 **Q. WHAT OTHER MECHANISM WAS PUT INTO PLACE IN 2014 TO SUPPORT**  
9 **INFRASTRUCTURE DEVELOPMENT OF NATURAL GAS DISTRIBUTION**  
10 **COMPANIES?**

11 A. On March 14, 2013, the Commission approved Columbia's Distribution System  
12 Improvement Charge ("DSIC") which allows Columbia to recover reasonable and prudent  
13 costs incurred to repair, improve, or replace certain eligible distribution property that is  
14 part of the utility's distribution system. Columbia was the initiator of the DSIC filing at  
15 Docket No. P-2012-2338282. It claimed that if a DSIC were in place there would be a

1 reduced need to file base rate cases. Clearly Columbia is doing just the opposite of what it  
2 stated in its DSIC filing.

3

4 **Q. WHAT ARE THE KEY COMPONENTS OF COLUMBIA'S DSIC PROPOSAL?**

5 A. The DSIC is capped at 5.0% of distribution service revenues. Currently Columbia's DSIC  
6 is 0% since it had just completed a base rate case and had included its capital improvements  
7 in base rates.

8

9 **Q. USING COLUMBIA'S DSIC CAP OF 5.0% OF TOTAL REVENUES, WHAT**  
10 **COULD THE DSIC AMOUNT BE?**

11 A. In Columbia's Exhibit 103, Sch 8, P. 1, the proposed distribution (non-gas) revenues are  
12 stated at \$418,740,873. In this case the DSIC amount would be \$20.9 million. The revenue  
13 increase proposed in this case is \$46.9 million. While I cannot predict the outcome of this  
14 proceeding and do not know what the final revenue increase will be, it would be highly  
15 unlikely that it will be the entire request, and much more likely that it will be a fraction of  
16 that. Having a DSIC provides Columbia the ability to receive revenue of a similar magnitude  
17 as what it may receive in this case.

18

19 **Q. WHAT OPERATING EXPENSES SHOULD BE REDUCED IF THE COMPANY**  
20 **IMPROVED ITS DISTRIBUTION SYSTEM?**

21 A. Presumably all that capital investment in the infrastructure should produce numerous  
22 improvements such as reduced gas losses due to leaks, better gas control, reduced labor  
23 and maintenance costs and other benefits that should be reflected through pro forma

1 adjustments to its expense claims. Unfortunately, the overall operation and maintenance  
2 expenses filed in this case are increased significantly from the 2014 case and those pro  
3 forma reductions do not appear.

4  
5 **Q. SHOULD COLUMBIA BE ABLE TO ATTRACT LOWER CAPITAL COSTS AS A**  
6 **RESULT OF THE AVAILABILITY OF ITS DSIC?**

7 A. Yes. Columbia's Ms. Krajovic testified in its DSIC filing at Docket P-2012-2338282 that  
8 "While infrastructure replacement will result in rate increases for Columbia's customers,  
9 the availability of the DSIC will enable the Company to attract lower cost capital"  
10 (Statement No. 1, 3:6-8). In this proceeding, Mr. Moul, the Company's outside consultant  
11 for rate of return issues, testified that "The cost of capital for CPA, however, is not affected  
12 by the DSIC" (Statement No. 8, 8:5) and claims that because other natural gas companies  
13 are undertaking infrastructure rehabilitation mechanisms that the lower cost of capital  
14 promised by Ms. Krajovic is already accounted for. Natural gas utilities have been  
15 conducting infrastructure replacement of steel pipe for decades and Mr. Moul's contention  
16 that the benefit of the DSIC should be ignored is not credible.

17  
18 **Q. WHAT CLAIM DOES MR. MOUL MAKE REGARDING RISK OF LARGE**  
19 **VOLUME CUSTOMERS WITH COMPETITIVE ALTERNATIVES?**

20 A. Mr. Moul claims that the sum of large volume customers and customers with competitive  
21 alternatives represents 35.2% of the Company's total throughput. (*Id.* at 8:18-19). Mr.  
22 Moul then claims this group is subject to four primary threats, which I will summarize as  
23 (1) attrition, (2) bypass, (3) fuel switching, and (4) shifts of production outside of

1 Columbia's service territory, and that because of such threats "All of these risks put fixed  
2 cost recovery for this class of customers at risk." (*Id* at 9:12-13) None of those four items  
3 is significant in differentiating the Company from the proxy group of companies that Mr.  
4 Moul used in his calculations for his proposed equity rate of return. Generally speaking,  
5 gas distribution utilities such as the proxy group always have experienced and will continue  
6 to experience most all of Mr. Moul's stated four reasons. They all experience customer  
7 attrition. Nothing is unique about Columbia's situation.

8 All gas companies experience potential bypass to interstate pipelines because FERC  
9 regulations require such pipelines to provide non-discriminatory access as a common  
10 carrier, so nothing is unique about Columbia's situation. Mr. Moul also claims that bypass  
11 to other local distribution companies is a risk, however the ability of customers to switch  
12 distribution companies has significantly lessened since the "gas wars" period of the past.  
13 There are two main reasons for the large reduction in LDC competition. First, there has  
14 been significant merger and acquisition activity in the very competitive western  
15 Pennsylvania region. Historically four utilities, Columbia, Peoples Gas, TW Phillips Gas  
16 & Oil, and Equitable Gas did actively compete, however Peoples has purchased both TW  
17 Phillips Gas & Oil and Equitable Gas, greatly reducing the number of local distribution  
18 utilities in the region. Second, the PUC conducted a rulemaking on Gas-On-Gas  
19 competition (P-2011-2277868) to address competition and issued its Order on May 4,  
20 2017. The Order supported the ALJ recommendation that, at the minimum, ratepayer  
21 funded gas-on-gas rate discounts be abolished no later than December 31, 2018. This has  
22 had a chilling effect on such competition making this an insignificant risk. The impact of

1 this change in policy and reduction in competition actually will lower, not increase, the risk  
2 experienced by Columbia during the FFTY of this proceeding.

3 Third, all LDCs experienced fuel switching because the availability of oil or propane is not  
4 geographically restricted to Pennsylvania and natural gas pricing has been competitive  
5 during the HTY and is predicted to continue as such, meaning that fuel switching is no  
6 longer the threat it was historically. This will have the opposite effect on Columbia's risk  
7 than Mr. Moul predicts and instead of increasing risk, Columbia is now and will experience  
8 reduced risk.

9 Mr. Moul's fourth reason, that companies may shift production to locations outside  
10 Columbia's service territory is no different than risk that all the proxy companies  
11 experience. Columbia's tariff actually contains Rider EDS which gives the Company the  
12 ability to provide discounted rates to attract new facilities to its territory. Once again, Mr.  
13 Moul's claim that risk is increased due to production shifting is shown to be the opposite  
14 of what the Company can actually experience and therefore the Company's risk is not  
15 increased but instead will be lower.

16 Not only must Mr. Moul's recommendation to include 20 basis points in his cost of equity  
17 recommendation (*id.* at 5:15) be rejected, but also it must be recognized that the Company's  
18 risk has actually decreased from the historic test year and continues on such a trend.

19 In summary, Mr. Moul's efforts to increase the Company's rate of return on common  
20 equity have been shown to be unfounded and in fact reversed. His efforts to increase the  
21 Company's rate of return from the currently experienced 6.30% overall rate of return stated  
22 in its filing (Statement No. 1, 17:3) should be rejected.

23

1 **IV. FLOW ORDER ISSUES**

2

3 **Q. HAVE YOU REVIEWED THE TARIFF SECTION CONCERNING FLOW**  
4 **ORDERS AND ELECTIVE BALANCING SERVICE?**

5 A. Yes. I have reviewed the tariff language of section 3.8.5.1 in the Rules Applicable to All  
6 Distribution Service and concluded that Columbia has structured its operations and use of  
7 flow orders to discriminate against those customers that choose to obtain gas supply from  
8 competitive marketers over those customers that choose to obtain gas supply from  
9 Columbia. Such behavior is contrary to Commission policy and should weigh heavily in  
10 consideration of not granting Columbia a rate increase of the magnitude it requests or  
11 should be used to reduce its return on equity for poor performance or servicing of  
12 customers.

13 To prevent such abuses in the future I am proposing revisions in the flow order tariff  
14 language to create a level playing field and keep penalties from becoming excessively and  
15 unjustifiably high. Such ridiculously high charges that are based on skewed prices in  
16 Columbia's penalty formula essentially delegates ratemaking to third parties that this  
17 Commission does not regulate. The result of the penalties Columbia instituted is contrary  
18 to promoting shopping and competition for large users like PSU and works at cross  
19 purposes for everything this Commission worked hard to create for a decade or more to  
20 promote and foster competition.

21

22 **Q. WHAT IS A FLOW ORDER?**

1 A. A flow order is direction from a pipeline to Columbia and other customers or from  
2 Columbia to its General Distribution Service customers or their suppliers that is issued so  
3 the pipeline or Columbia can manage the gas transmission or distribution system and  
4 operate within safe pressure parameters. Flow orders can be declared for many reasons.  
5 Perhaps a pipe ruptures, or a compressor station is down due to maintenance or unforeseen  
6 circumstances. Perhaps the weather is unseasonably cold. All of these can create situations  
7 that could cause the system pressure to fall below safe minimum pressures. Many flow  
8 orders are issued due to "Upstream Contract Requirements." These requirements can  
9 include contractual arrangements that Columbia makes to obtain gas supply for those  
10 customers that have not selected a natural gas supplier. In the past, most commonly a flow  
11 order would be called in cold weather to direct shippers to deliver a certain minimum  
12 amount of gas to the Columbia system. More recently, on the Columbia system, warm  
13 weather flow orders are often frequently issued. Columbia issues flow orders more  
14 frequently than any other local distribution company in the Commonwealth. Its actions  
15 during December 2017 and January 2018 were specifically harmful to transportation  
16 customers like Penn State.

17

18 **Q. WHAT IS ELECTIVE BALANCING SERVICE?**

19 A. Elective balancing service is offered to Columbia's GDS customers pursuant to the  
20 Company's Tariff Rider EBS to address situations when the volume of natural gas  
21 consumed by a GDS customer does not match the volume delivered to the Company's  
22 system pursuant to the customer's purchase orders. The process of matching the gas  
23 volume delivered to the gas volume consumed is called balancing.

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**Q. WHY WOULD A CUSTOMER NOT DELIVER THE SAME AMOUNT OF GAS AS IT CONSUMES?**

A. Customers or suppliers on their behalf must order and purchase the gas they need for their operations in advance through a process known as nomination. Even though there are analytical forecasting methods used to determine the amount of gas that is expected to be necessary there can be operational and weather differences that occur from the time that gas is nominated. The simplest illustration of this would be the inaccuracy of a weather forecast made just one day prior when compared to the actual weather on that day.

**Q. WHERE DOES COLUMBIA’S TARIFF ADDRESS FLOW ORDERS?**

A. Columbia addresses flow orders in the tariff section Rules Applicable Only To General Distribution Service (“RADS”), which is section 3. Flow orders are also addressed in the Company’s tariff Rider EBS – Elective Balancing Services, which, as more fully discussed later in my testimony, provides balancing service options to GDS customers. Columbia terms flow orders issued to customers that do not have daily measuring metering devices Operational Flow Orders (“OFO”) and flow orders issued to customers with daily metering devices Operational Matching Orders (“OMO”). Columbia states in RADS § 3.5.4, “[t]he Company has the authority to issue OFOs and OMOs whenever the Company believes that the daily safe and/or reliable operation of its distribution system may be jeopardized including, without limitation, the need to protect the daily supply of Sales and Choice customers.”

1 **Q. IS THE AUTHORITY DESCRIBED IN RADS § 3.5.4 NECESSARY?**

2 A. While it is important that Columbia operate a safe and reliable distribution system there is  
3 a contrast between prudent operation of a system vs. excessive use of flow orders. It is  
4 Columbia's business practice to issue flow orders frequently. In the experience of Penn  
5 State, all of its campuses served by Columbia have received flow orders in the past  
6 significantly more frequently than its other campuses receive flow orders from other local  
7 distribution companies in the Commonwealth.

8  
9 **Q. WHAT ARE THE CAMPUSES THAT ARE NOT SERVED BY THE COLUMBIA**  
10 **DISTRIBUTION SYSTEM?**

11 A. A majority of Penn State's campuses are served by other distribution utilities. Peoples Gas  
12 serves the New Kensington, Altoona, and Greater Allegheny campuses. National Fuel Gas  
13 serves the Behrend, Shenango, and DuBois campuses. UGI serves the PA College of  
14 Technology, Wilkes Barre, Scranton, Hazleton, Schuylkill, Lehigh Valley, Carlisle,  
15 Harrisburg, Hershey, and Berks campuses. Abington and Brandywine campuses are served  
16 by PECO Energy. Flow order frequency from those other distribution utilities were much  
17 less than that of Columbia, although in general these other LDCs are connected and  
18 supplied through some of the same interstate pipelines as Columbia.

19  
20 **Q. ARE THE FLOW ORDER ISSUES YOU DISCUSS SPECIFIC TO PENN STATE?**

21 A. No. I am concerned over problems created by Columbia's use of flow orders and the  
22 discriminatory nature of the flow orders that harm transportation customers and manipulate  
23 the market. My concerns would apply to Choice and General Distribution Service ("GDS")

1 customers in residential, commercial and industrial classes. All could be disadvantaged as  
2 was Penn State. The usage and cost evidence I will present is specific to Penn State.

3  
4 **Q. WHAT IS THE DELIVERY TOLERANCE TO BE IN COMPLIANCE WITH A**  
5 **COLD WEATHER FLOW ORDER?**

6 A. The tariff states, "Should a Shipper on any SFO, OFO, or OMO day under-deliver gas  
7 supplies to the Company by a quantity greater than 5% of the customer's currently effective  
8 MDQ and any interruptible access to the bank permitted through the SFO, OFO or OMO  
9 notice, such quantities shall be charged to the Customer Proxy in accordance with the  
10 Consumption in Excess of Deliveries, Seasonal Flow Orders, Operational Flow Orders or  
11 Operational Matching Orders sections of the Rules Applicable Only to General  
12 Distribution Service section of the RADS as is appropriate to the circumstance." This is  
13 from Rider EBS- Elective Balancing Service.

14  
15 **Q. WHAT WERE THE ACTIONS UNDERTAKEN BY COLUMBIA DURING THE**  
16 **PAST YEAR THAT INVOLVED THE ISSUANCE OF FLOW ORDERS?**

17 A. Columbia issued flow orders on 68 days during the 12-month period May 1, 2017 to May  
18 1, 2018 season. This set of flow orders included the continuous period of December 28  
19 through January 6. During that period, Penn State, a daily metered customer at its boiler  
20 plants served through three meters, was required to provide gas deliveries to match what it  
21 burned each day, and to insure those deliveries did not fall below the delivery tolerance  
22 stated in Columbia's OMO. There is no set formula specified in the tariff for the  
23 determination of the OMO restrictions and Columbia issues those directives without

1 oversight. I recognize that issuance of flow orders is one tool of system management yet  
2 the unbridled actions of the Company are harmful to customers and the resulting cost shifts  
3 and cross-class subsidies must be ended. Improved procedures for this should be  
4 developed through a collaborative process that should be held within 30 days of the  
5 conclusion of this case. PSU is also subject to OFOs on most of its campus account (those  
6 meters that do not serve the steam plants) and Columbia issues delivery tolerance  
7 percentages for monthly metered customers. There is no set formula specified in the tariff  
8 for the determination of the OFO restrictions and Columbia issues those directives without  
9 oversight.

10 In addition to the OMO/OFO tolerances, GDS customers, like PSU, that pay for  
11 Columbia's Full Balancing Service receive a tolerance level of 5% of their OMO/OFO  
12 level pursuant to Columbia's Elective Balancing Services Rider Option 1. The tariffed  
13 tolerance level of 5% of OMO/OFO level was established fifteen years ago in a Settlement  
14 at Docket No. R-00016668 with the order adopted on January 24, 2002. PSU was not party  
15 to that settlement. The EBS is less effective due to Columbia's frequent issuance of flow  
16 orders, which require daily balancing.

17  
18 **Q. WAS COLUMBIA UNDER FLOW ORDER RESTRICTIONS ISSUED BY ANY**  
19 **UPSTREAM PIPELINE COMPANIES DURING THE DAYS THAT IT ISSUED**  
20 **THE FLOW ORDERS?**

21 **A.** Yes. The data response to NGS Parties Set I-1, Attachment A, (Exhibit PSU -1) shows  
22 that for each of the days of the flow orders identified previously (December 28-January 6)  
23 Columbia stated that the reasons for the issuance of flow orders was "TCO Critical Day

1 Transport, TETCO Limit of Scheduled Supplies, Dominion Limit of Scheduled Supplies,  
2 Tennessee Limit of Scheduled Supplies”. TCO is the Columbia Gas Transmission pipeline  
3 that is owned by TransCanada.

4

5 **Q. DID ANY OF THE OTHER LOCAL DISTRIBUTION UTILITIES THAT**  
6 **DELIVER GAS TO OTHER PENN STATE CAMPUSES ISSUE FLOW ORDERS**  
7 **SIMILAR TO COLUMBIA?**

8 A. No. Penn State has campuses around the Commonwealth and is served by four distribution  
9 utilities other than Columbia. Peoples Natural Gas, National Fuel Gas, UGI, and PECO  
10 Energy all serve Penn State campuses and none of them issue flow orders with the same  
11 frequency Columbia does. Columbia’s behavior is unique among the distribution utilities  
12 in the Commonwealth.

13

14 **Q. HOW DOES RIDER EBS OPTION 1 AFFECT GDS CUSTOMERS?**

15 A. Under normal conditions customers may deliver a quantity of gas up to its Maximum Daily  
16 Quantity (“MDQ”) which is an amount the Company establishes for customers based on  
17 recent historical consumption, and that amount delivered may be greater than the customer  
18 demand on that day. The delivery in excess of consumption is known as over-delivery.  
19 Over-delivery is used if the customer needs to bring their monthly deliveries and  
20 consumption into balance and there have been periods during the month where the  
21 customer consumed more gas than was delivered. A delivery that is less than the daily  
22 consumption is known as under-delivery. Under-delivery is used if the customer needs to  
23 bring their monthly deliveries and consumption into balance and there have been periods

1 during the month where the customer consumed less gas than was delivered. Pursuant to  
2 Columbia's tariff Rider EBS, an OMO restricts under-deliveries up to 5% of the currently  
3 effective MDQ times the percentage tolerance issued for the day and to the extent made  
4 available by the Company on a best efforts basis, additional interruptible access to the  
5 Customer Proxy's bank. OFOs include specific delivery tolerances for monthly metered  
6 accounts.

7  
8 **Q. WHAT ARE PENN STATE'S PURCHASING PRACTICES?**

9 A. PSU normally plans its gas procurement prior to the month so that during the month the  
10 forecast daily average volume is delivered each day of the month. During the month daily  
11 meter readings are monitored and compared to deliveries. Purchase reductions are made  
12 if needed or purchase increases are made for any deficiencies. Such a strategy is prudent  
13 because gas is used not only for the two steam plants on campus but also for a natural gas  
14 combustion turbine-generator. The gas turbine-generator may be subject to outages in  
15 which case PSU gas deliveries would result in a daily overage and such overages would  
16 put PSU out of balance at the end of the month were it not for PSU having available EBS  
17 bank tolerance. It is easier and more financially prudent to purchase gas during the month  
18 if necessary than to have to sell off excess gas.

19  
20 **Q. WHAT ISSUES DID COLUMBIA'S FLOW ORDERS CREATE FOR PENN**  
21 **STATE?**

22 A. In December 2017 and January 2018 PSU followed its usual practice of scheduling its  
23 forecast average daily demand. Upon receipt of the flow orders issued by Columbia, PSU

1 increased its nominations and deliveries, however it was unable to meet the amounts  
2 Columbia required. One significant factor that caused this is the discrepancies that exist  
3 between Columbia's meters and the meters that Penn State had installed to verify  
4 Columbia's meter data. Since consumption was above average during that period, PSU  
5 needed to increase its deliveries on a daily basis. Penn State delivered the quantity of gas  
6 its measurement system showed was used in its boilers, however Columbia's meters saw  
7 it differently. Because PSU was not in daily balance for several days according to the  
8 Columbia meters, PSU was issued a penalty by CPA at the end of January and that penalty  
9 amount was based on the high prices outlined in its tariff.

10  
11 **Q. WHAT IS THE PRICE COLUMBIA CHARGES FOR IMBALNCE GAS?**

12 **A.** As stated in tariff 3.8.5.1:

13 For days when daily usage is available on the Company's internet web site,  
14 the rate will be equal to three (3) times the highest of the midpoint prices  
15 reflected in Platts Gas Daily for the day of the OMO non-compliance and  
16 based on pipeline scheduling point applicable indices as specified in the  
17 Platts "Gas Daily", Daily Price Survey – Designation by Pipeline Scheduling  
18 Point paragraph of Rule 2. Rules Applicable to All Distribution Service in the  
19 Rules Applicable to Distribution Service of this tariff.

20 During the first week of January 2018, on January 5, the amount Columbia charged  
21 customers was \$274.05/Dth based on data provided in the data response to PSU Set 1 1-  
22 001 Attachment A, which I include as Exhibit PSU-2. In comparison, the Henry Hub price  
23 as I am drafting this testimony is \$2.93/Dth, and the highest price during the entire month  
24 of January for any of the three pipelines that are capable of delivering to the State College  
25 market area was one-third of that according to the non-compliance formula in Columbia's  
26 tariff section 3.8.5.1.1. It is clear that Columbia's penalty or charges for non-compliance

1 amount is not just and reasonable and should be limited to a twenty percent premium over  
2 what it costs the Company to remedy an imbalance situation. In cases where the Company  
3 is assessed penalties by upstream pipeline companies for non-compliance to flow orders,  
4 then the proportional share of those penalties should be assessed to customers that did not  
5 comply with the flow order.

6  
7 **Q. HOW DOES COLUMBIA USE THE PENALTY STRUCTURE TO BENEFIT**  
8 **THOSE CUSTOMERS WHO CHOOSE TO RETAIN COLUMBIA AS THEIR**  
9 **NATURAL GAS SUPPLIER?**

10 A. Columbia takes the penalty revenues it collects from transportation customers and applies  
11 it to the cost of gas it sells to its own supply customers, resulting in a more attractive gas  
12 price for those customers. Columbia's actions skew the playing field to strongly favor its  
13 own supply customers. This subsidy from shopping customers of one class to default  
14 customers of another class is contrary to competition.

15  
16 **Q. WHAT ARE THE MARKET SHARES OF COLUMBIA AS A GAS PROVIDER?**

17 A. In its response to NGS Parties Set 1-002, 003, and 004, attached as Exhibit PSU-3,  
18 Columbia identified the market shares of the natural gas suppliers as 98.5% for industrial,  
19 53.7% for commercial, and only 18.8% for residential. Columbia's shares of those market  
20 segments are 1.5% for industrial, 46.3% for commercial, and a whopping 87.2% for  
21 residential. Columbia controls the lion's share of the residential market.

22

1 **Q. WHAT MARKET SEGMENT HAS CONSUMPTION THAT IS MOST AFFECTED**  
2 **BY COLD WEATHER?**

3 A. The residential segment is most sensitive to temperature and during very cold periods the  
4 increased needs of residential customers put a strain on gas distribution systems. During  
5 such periods Columbia should plan on increasing gas supplies it has delivered to its system  
6 to meet the increased needs of residential customers. This step should be taken first, prior  
7 to issuing flow orders to other customer classes and pushing the burden of maintaining  
8 system integrity to the commercial and industrial transportation customers.

9  
10 **Q. WHY ARE COLUMBIA'S ELECTIVE BALANCING SERVICES NOT A**  
11 **SOLUTION TO THESE PROBLEMS?**

12 A. Columbia offers Full Balancing Service under its ESB Rider Option 1, which allows gas  
13 users to store gas in a bank, and Penn State does subscribe to this service, however  
14 Columbia limits the daily delivery shortfall amount that may be supplied by gas in storage  
15 to only 5% of the MDQ. Even when Penn State has additional gas in storage it may not  
16 use it to meet the requirements of Columbia's flow order without Columbia's permission  
17 which it claims it will provide on a "best efforts" basis.

18 That certainly does not promote competition but represents a step backward from the  
19 Commission's and Legislature's policy of promoting the competitive supply of natural gas.  
20 Because Columbia limits the remedy that a customer may use to address an imbalance, the  
21 current excessive charges that Columbia renders for non-compliance must be reduced as I  
22 have already recommended.

23

1 **Q. SPECIFICALLY HOW DID COLUMBIA BENEFIT FROM ITS ISSUANCE OF**  
2 **FLOW ORDERS?**

3 A. Columbia's flow orders in December 2017 and January 2018 were for continuous periods  
4 which were longer than a few days. Customers are then forced to pay penalties to Columbia  
5 at penalty prices significantly higher than market prices. The penalty rate in January  
6 reached a maximum of \$284.775/Dth. By issuing flow orders, then assessing draconian  
7 penalty charges to transportation customers, and then applying those penalty revenues to  
8 lower the cost of gas Columbia offers for sale to customers, Columbia tilts the playing field  
9 substantially in its favor.

10

11 **Q. ARE COLUMBIA'S OMO PROCEDURES AND PENALTIES UNREASONABLY**  
12 **DISCRIMINATORY AGAINST NATURAL GAS CUSTOMERS WHO SHOP**  
13 **FOR SUPPLY FROM COMPETITIVE MARKETERS?**

14 A. Yes. It has long been established in Pennsylvania that distribution utilities may not  
15 discriminate against suppliers or customers who shop for supply from competitive  
16 marketers. Rules and actions taken by such utilities must provide a fair and level playing  
17 field for all customers. Therefore, distribution utilities such as Columbia may not  
18 discriminate against suppliers or customers who shop for supply from competitive  
19 marketers by providing lower distribution charges or preferential service to those  
20 customers taking system supply from Columbia. The Standards of Conduct are described  
21 in tariff section 2.19.

22 Here, Columbia's practice of issuing frequent flow orders to comply with contractual  
23 requirements it has with TCO shifts the burden and cost of compliance with those

1 constraints onto PSU, other GDS customers, and competitive suppliers. It is manifestly  
2 unreasonable for Columbia to impose the costs of unpredicted cold weather or TCO's  
3 capacity issues solely or disproportionately on suppliers or customers who shop for supply  
4 from competitive marketers, especially when those customers are delivering their gas as  
5 PSU does through DTI, not TCO.

6  
7 **Q. ARE COLUMBIA'S OMO PROCEDURES AND PENALTIES REASONABLE**  
8 **AND RATIONAL?**

9 A. No. Arbitrary and capricious would better describe them. Just examine what happened  
10 during the last week of December 2017 through the first week of January 2018. On  
11 December 25 and 26 Columbia received pipeline penalties, yet did not issue flow orders  
12 that might have helped avoid penalties as is shown in the data response to PSU Set I-001,  
13 included as Exhibit PSU-2. On December 27 it began issuing flow orders, yet still received  
14 pipeline penalties for that day and the next. On December 29 it continued the imposition  
15 of flow orders through January 7 and received penalties on January 4 and 5. During for  
16 the fourteen-day period (December 25 - January 7) Columbia received penalties on two  
17 days that it did not issue a flow order (December 25 and December 26). It began issuing  
18 flow orders on December 27 and received penalties on three additional days, yet issued  
19 penalties to GDS suppliers for those three days and an additional day after that. To clearly  
20 see the unfairness in the Columbia penalty structure, the amount of the penalties must be  
21 examined. Reviewing the penalty amounts shown in the data response to PSU Set I-001,  
22 included as Exhibit PSU-2, the total penalty amount that was assessed to Columbia from  
23 the pipelines in the most recent 12 months was \$630,723, yet the total penalty amount that

1 Columbia assessed GDS suppliers was \$1,591,436. The penalty system as Columbia has  
2 it structured is unreasonable. Any non-compliance amounts that Columbia collects from  
3 GDS customers should be applied to providing additional balancing and storage to that  
4 group.

5  
6 **Q. DOES COLUMBIA PROVIDE GDS SUPPLIERS WITH ADEQUATE NOTICE OF**  
7 **FLOW ORDERS ALONG WITH CONSUMPTION DATA TO ENABLE**  
8 **SUPPLIERS TO RESPOND?**

9 A. No. Columbia issues a flow order which means a customer or supplier must take action to  
10 balance deliveries with consumption, however to do so the supplier requires accurate  
11 consumption data. Such data is not available at that time even though Columbia has  
12 electronic metering on their large commercial and industrial accounts. When the data are  
13 available, which is three hours after the conclusion of the gas day, which runs from 10 AM  
14 to 10 AM nomination deadline the only option available to a GDS supplier is to conduct a  
15 gas transfer with another supplier who finds themselves in a surplus gas delivery situation.  
16 A gas supplier is at a huge disadvantage because they do not know that an adjustment is  
17 needed until three hours after the close of the gas day. The supplier is at a distinct  
18 disadvantage because Columbia has already taken action to remedy its own gas supply  
19 shortages which creates higher pricing for the remaining gas available to suppliers. This  
20 system must be changed so that both Columbia and GDS suppliers receive consumption  
21 data at the same time and can take action at the same time.

22

1 **Q. HOW SHOULD THE PROCEDURE AND PENALTY SYSTEM BE MODIFIED IN**  
2 **SUCH CIRCUMSTANCES?**

3 A. First, there is a long overdue need for better communication from Columbia to customers  
4 well in advance of OMOs being issued and that absence has resulted in less than the service  
5 that should be provided by a regulated utility. Alerts issued by Columbia, if they are issued  
6 at all, typically come one to four days in advance of a flow order and that is not adequate  
7 time to remedy shortfalls. Such improved communication should forewarn customers at  
8 the earliest possible time so that they may proactively work to adjust deliveries to avoid  
9 being out of balance.

10 This would promote competition as opposed to Columbia's existing practice which  
11 punishes customers who purchase from other suppliers. Again, Columbia's practice is  
12 driven by its economic interest of gas supply sales and its solution of charging draconian  
13 penalties to others, such as Penn State, should be soundly rejected as contrary to the  
14 purpose of our Legislature's intent and this Commission's policy to foster and promote  
15 competitive supply. Columbia is using the flow order system, that was designed for the  
16 protection of the distribution system and for emergencies, as a tool for economic gain to  
17 the detriment of customers.

18  
19 **Q. WHAT SHOULD BE CHANGED WITH THE ABILITY OF COLUMBIA TO**  
20 **ISSUE FLOW ORDERS?**

21 A. While Columbia should be able to issue operational alerts notifying customers of  
22 conditions that might cause the issuance of a flow order, in the future Columbia should not  
23 be permitted to issue flow orders unless they are under restrictions of flow orders issued

1 by a pipeline company for the same delivery zone. In other words, a pipeline flow order  
2 restriction that applies to a segment of Columbia's distribution system should not result in  
3 Columbia issuing a flow order that is applicable to a different part of its distribution system.  
4

5 **Q. WHAT SHOULD BE CHANGED WITH THE PENALTY AMOUNTS FOR NON-**  
6 **COMPLIANCE WITH FLOW ORDERS?**

7 A. The penalty amounts should be reasonable. For situations where Columbia has received  
8 absolutely no penalty from an interstate pipeline the penalty amount should be set fairly to  
9 be a 20% penalty on the actual cost of any gas Columbia had to purchase to remedy an  
10 imbalance situation. For situations where Columbia has received a penalty from an  
11 interstate pipeline the penalty amount should be set fairly to be a 20% penalty on the actual  
12 cost of any gas Columbia had to purchase to remedy an imbalance situation, plus the  
13 proportional amount of the pipeline penalty that is based on the volumes of GDS customers  
14 that flowed during the penalty situation compared to the total throughput during the same  
15 period.  
16

17 **Q, HOW SHOULD ANY PENALTIES COLLECTED BY COLUMBIA FROM GDS**  
18 **SUPPLIES BE APPLIED?**

19 A. Such penalty amounts should not flow into Columbia's gas supply but instead should flow  
20 to the costs used to provide balancing and banking capability for GDS suppliers. This will  
21 eliminate the cross-subsidy across customer classes, which is an important goal.  
22

23 **Q. WHAT TARIFF REVISIONS DO YOU RECOMMEND?**

1 A. I have several recommendations:

2 1. Section 3.8.5.1 should be modified as:

3 3.8.5.1 The non-compliance charges will be assessed as follows:

4 3.8.5.1.1 When a customer meter uses Company-installed communication  
5 equipment for daily measurement:

6 (a) For days when daily usage is available on the Company's internet web site *at*  
7 *least 2 hours after the close of the gas day*, the rate will be equal to *1.2* times the  
8 *highest gas cost paid by the Company for gas delivered to the same market area*  
9 *for the day of the OMO non-compliance.*

10  
11 (b) For days when daily usage is not available on the Company's internet web  
12 Site, and that daily usage is not available by the end of the OMO period, the  
13 rate will be equal to *1.1* times the *highest gas cost paid by the Company for gas*  
14 *delivered to the same market area* for the day of the OMO non-compliance.

15 3.8.5.1.2 When a customer meter uses customer-owned telephonic  
16 communication equipment for daily measurement the rate will be equal to *1.2*  
17 *times the highest gas cost paid by the Company for gas delivered to the same*  
18 *market area* for the day of the OMO non-compliance.  
19

20 2. Add a new section 3.8.5.6

21 In the event the Company issues an OMO for multiple days that include any  
22 portion of the last two weeks of the delivery month, the customer shall have the  
23 option to either deliver gas during the OMO of sufficient quantity to eliminate any  
24 deficiency in the customer's monthly balance or to make up any deficiency in the  
25 following delivery month over a period of the same number of days that OMOs  
26 were in effect.  
27 .

28 3. When the Company issues a flow order (OFO/OMO) that is in part due to a flow order  
29 received by an interstate pipeline, customers and suppliers that elect to bring their gas into  
30 the Columbia system through a different interstate pipeline that has not issued a flow order  
31 shall not be subject to the Company's flow order.  
32

1 V. **THE COMPANY ERRED IN ASSIGNING REVENUE INCREASES BY CLASS**  
 2 **FOR IT DID NOT TAKE INTO ACCOUNT THAT FLEX CUSTOMERS CAN**  
 3 **BEAR NO INCREASE**

4 Q. **DO YOU AGREE WITH THE COMPANY'S ASSIGNMENT OF REVENUE TO**  
 5 **THE LDS CLASS?**

6 A. No. Ms. Strauss proposes to increase the LDS class Base Revenue by \$1,780,343 (Exh.  
 7 103, Sch. No. 8, P. 1), an increase to the rate class of 9.95%. Total class volumes are  
 8 20,651,944 Dth and about half the customers are competitive and served under flex rates  
 9 (10,416,573 Dth or 50.8%). It is well established that the flex customers cannot be  
 10 allocated any increase due to their competitive circumstances. If the entire amount of  
 11 revenue increase is borne by the non-flex customers of that class that would produce an  
 12 excessively large increase.

13  
 14 Q. **DOES PENN STATE HAVE ACCOUNTS THAT ARE SERVED UNDER THE LDS**  
 15 **RATE CLASS?**

16 A. Yes.

17  
 18 Q. **SHOULD THE ENTIRE LDS CLASS INCREASE BE THE RESPONSIBILITY OF**  
 19 **JUST THE NON-COMPETITIVE LDS CUSTOMERS?**

20 A. No. The merit of offering flex rates to competitive customers has been established in  
 21 several rate proceedings of Columbia and other NGDCs where competition exists and the  
 22 NGDCs engage in that practice. Offering flex rates to retain customer load benefits all the  
 23 classes of customers of the utility for those flex rate customers are making a positive  
 24 contribution to revenues, in excess of the marginal costs to serve them. For this reason,  
 25 the increase in revenue that the Company has allocated to the non-competitive customers

1 of the LDS class should actually be allocated to all non-competitive customers of all  
2 classes.

3

4 **Q. WHAT ARE THE PERCENTAGES OF COMPETITIVE AND NON-**  
5 **COMPETITIVE CUSTOMERS IN THE LDS CLASS?**

6 A. The competitive customers represent 50.8% of the class volumes and the non-competitive  
7 customers represent 49.28% of the class.

8

9 **Q. ARE THERE FLEX CUSTOMERS IN OTHER CLASSES?**

10 A. Yes. The SGDS class has 27,168 Dth of flex volumes (0.7% of the class volumes) and the  
11 SDS class has 208,600 Dth of flex volumes (3.3% of the class volumes). The flex  
12 customers in those classes will not be bearing any increases so the same issue of having  
13 the non-flex customers bearing the entire class increase exists. The magnitude of the  
14 impact is much less because of the smaller flex amounts.

15

16 **Q. BASED ON THAT, WHAT IS THE AMOUNT OF THE REVENUE REQUIRMENT**  
17 **THAT SHOULD BE ALLOCATED FROM THE INDUSTRIAL CLASS TO THE**  
18 **OTHER RATE CLASSES?**

19 A. Currently Columbia proposes to allocate an increase of \$1,780,343 to the non-competitive  
20 LDS customers. Instead, only 49.2% or \$875,928 should be allocated to the LDS class and  
21 \$904,415 should be allocated to the non-competitive customers in the other classes, except  
22 MLDS/MLSS. Ms. Strauss should be directed to update her proposed revenue allocations

1           accordingly and reallocate that amount to the other classes using the same ratio of revenue  
2           allocation proposed by the Company.

3

4   **Q.    WHAT IS THE SUMMARY OF YOUR TESTIMONY?**

5   **A.    I have three recommendations**

6           1. Because the Company's risk has decreased and not increased, the recommendation of  
7           Mr. Moul to increase the rate of return should be rejected.

8           2. The tariff rules regarding non-compliance with flow orders must be rewritten to be fair  
9           and reasonable and not the highly punitive structure currently in place which the Company  
10          uses to disadvantage those customers selecting natural gas suppliers instead of purchasing  
11          gas from the Company.

12          3. The revenue allocation to the LDS class must be reduced by 50.8% which represents the  
13          customer volumes in that class that are flexed and cannot bear an increase.

14

15   **Q:    DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

16   **A.    Yes.**



Summary of OMO/OFO Orders & Alerts  
December 28, 2017 through January 6, 2018

<A>	<B>	<C>	<D>	<E>	<F>		<G>	<H>	<I>	<J>	<K>			<L>
Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Penalties			Choice Suppliers	
					OMO	OFO				GDS Suppliers				
	12/28	Issued on 12/27/17 for 12/28/17 through 12/31/17	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 86% PSP 26 97% PSP 35 83% PSP 36 89% PSP 38 70% PSP 39 58% PSP 40 100%			Y	Y			N	
	12/29	Issued on 12/27/17 for 12/28/17 through 12/31/17	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 74% PSP 26 82% PSP 35 73% PSP 36 84% PSP 38 63% PSP 39 52% PSP 40 91%			N	Y			N	
	12/30	Issued on 12/27/17 for 12/28/17 through 12/31/17	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 67% PSP 26 86% PSP 35 77% PSP 36 83% PSP 38 66% PSP 39 59% PSP 40 100%			N	Y			N	
	12/31	Issued on 12/27/17 for 12/28/17 through 12/31/17	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 75% PSP 26 100% PSP 35 89% PSP 36 89% PSP 38 72% PSP 39 66% PSP 40 100%			N	Y			N	
Jan-18	1/1	Issued on 12/29/17 for 1/1/18 through 1/2/18	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 86% PSP 26 100% PSP 35 91% PSP 36 91% PSP 38 68% PSP 39 66% PSP 40 100%			N	Y			N	
	1/2	Issued on 12/29/17 for 1/1/18 through 1/2/18	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 82% PSP 26 100% PSP 35 87% PSP 36 87% PSP 38 66% PSP 39 64% PSP 40 100%			Y	Y			N	
	1/3	Issued on 1/2/18 for 1/3/18 through 1/5/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 90% PSP 29 100% PSP 26 100% PSP 35 100% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 100%	PSP 25 83% PSP 26 100% PSP 35 91% PSP 36 81% PSP 38 79% PSP 39 60% PSP 40 100%			N	Y			N	
	1/4	Issued on 1/2/18 for 1/3/18 through 1/5/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100% PSP 26 100% PSP 35 100% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 100%	PSP 25 100% PSP 26 100% PSP 35 100% PSP 36 86% PSP 38 87% PSP 39 70% PSP 40 100%			Y	Y			N	
	1/5	Issued on 1/2/18 for 1/3/18 through 1/5/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100% PSP 26 100% PSP 35 100% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 100%	PSP 25 100% PSP 26 100% PSP 35 100% PSP 36 96% PSP 38 95% PSP 39 72% PSP 40 100%			Y	Y			N	

<A>	<B>	<C>	<D>	<E>	<F>		<G>	<H>	<I>	<J>		
Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Penalties			
					OMO	OFO				Columbia	GDS Suppliers	Choice Suppliers
	1/6	Issued on 1/5/18 for 1/6/18 through 1/6/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100%	PSP 25 100% PSP 26 100% PSP 26 100% PSP 35 100% PSP 36 100 PSP 38 100% PSP 38 92% PSP 39 73% PSP 39 100% PSP 40 100%				Y	Y	N

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

PSU– Set 1

Question No. PSU 1-001:

Regarding Columbia's response to NGS Set 1-001, provide the penalty costs for Columbia, GDS Suppliers, Choice Suppliers (columns J, K, L). Provide details of penalty calculations for each penalty.

Response:

The penalty calculation is as follows:

Non-compliance volumes multiplied by the rate equals the penalty amounts assessed to GDS, Choice and Columbia.

See Attachment A to this response.

- Non-compliance volumes are shown in columns K, N and Q
- Penalty cost/amounts are shown in columns L, O and R
- Rate information is detailed below:

**GDS:**

Beginning December 19, 2016:

- (1) A rate equal to three times the highest of the midpoint prices reflected in Platts Gas Daily for the day of the OFO non-compliance and based on pipeline scheduling point applicable indices as specified in the Platts "Gas Daily", Daily Price Survey – Designation by Pipeline Scheduling Point paragraph of Rule 2. Rules Applicable to All Distribution Service in the Rules Applicable to Distribution Service of this tariff. The charge will be multiplied by the therm difference, except however, the charge will not be assessed if the difference results from the Shipper delivering more than the Daily OFO Level during an OFO that restricts under-deliveries, or from the Shipper delivering less than the Daily OFO Level during an OFO that restricts over-deliveries; and,

- (2) The payment of all other charges incurred by the Company on the date of the OFO that results from the Shipper's failure to comply with the OFO, including a proportionate share of any pipeline penalties that are incurred by the Company.
- (3) In the event midpoint prices referenced in subparagraph (1) above, are not published in Platts Gas Daily for the day of the OFO non-compliance, the highest price paid by the Company on that day shall be used as the index price.
- (4) The Company shall update the applicable indices on 60 days' notice to Customer Proxies in the event of a change in applicable indices. Applicable indices are subject to change based upon changes in market circumstances. OMO/OFO A rate equal to three times the highest of the midpoint prices reflected in Platts Gas Daily for the Day of the OMO or OFO non-compliance and based on pipeline scheduling point applicable indices as specified in the Platts "Gas Daily", Daily Price Survey - Designation by Pipeline Scheduling Point paragraph of Rule 2. Rules Applicable to All Distribution Service in the Rules Applicable to Distribution of this tariff.

Tariff Reference - Supplement No. 255 Tariff Gas - Pa. P.U.C. No. 9 Thirteenth Revised Page No. 207-208

Prior to December 19, 2016: A charge of \$2.33 per therm on all volumes taken in excess of the available specified volumes. Plus any penalties charged to CPA on date of OFO/OMO included a proportionate share of any pipeline penalties.

**Choice:**

Beginning December 19, 2016:

- (1) The therm difference will be multiplied by a rate equal to three times the highest of the midpoint prices reflected in Platts Gas Daily for the day of the OFO non-compliance and based on pipeline scheduling point applicable indices as specified in the Platts "Gas Daily", Daily Price Survey – Designation by Pipeline Scheduling Point paragraph of Rule 2. Rules Applicable to All Distribution Service in the Rules Applicable to Distribution Service of this tariff; and,
- (2) The payment of all other charges incurred by the Company on the date of the OFO that results from the NGS's failure to comply with

the OFO including a proportionate share of any pipeline penalties that are incurred by the Company.

- (3) In the event midpoint prices referenced in subparagraph (1) above, are not published in Platts Gas Daily for the day of the OFO non-compliance, the highest price paid by the Company on that day shall be used as the index price.

Tariff Reference: Supplement No. 251 Tariff Gas - Pa. P.U.C. No. 9 Sixth Revised Page No 242

Prior to December 19, 2016: Penalty assessed for the difference between daily OFO volume and actual deliveries are \$4.16 per therm for any over/under delivery. Payment of all other charges incurred by CPA on date of OFO, including a proportionate share of any pipeline penalties.

**Columbia:**

Columbia incurred penalty cost from Texas Eastern in the months of December 2017 and January 2018 for an OFO in Zone M3. These charges were calculated as defined in the Texas Eastern tariff:

All quantities tendered to Pipeline and/or taken by Customer under any Rate Schedule other than under Rate Schedule SCT, on a daily basis in violation of Pipeline's Action Alert or OFOs shall constitute unauthorized receipts or deliveries for which the applicable Action Alert or OFO penalty charge stated below shall be assessed.

OFO penalty charge for each Dekatherm of Gas by which Customer or point operator deviated from the requirements of the OFO equal to an OFO Index Price calculated as three (3) times the daily Gas Daily posting for the Day on which the deviation occurred for the high "Common" price for the geographical region, as defined in Section 8.5(A) of the General Terms and Conditions, in which the deviation occurred, multiplied by the quantity by which the Customer or point operator deviated from the requirements of the OFO.

Summary of OMO/OFO Orders & Alerts  
November 1, 2013 through April 30, 2018

<A>	<B>	<C>	<D>	<E>	<F>		<G>	<H>	<I>	<J>	<K>	<L>	<M>	<N>			<O>	<P>	<Q>	<R>
Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount			
					OMO	OFO														
May-17	5/1	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	5/2	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	5/3	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	5/4	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	5/5	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	5/6	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	5/7	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	5/8	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	5/9	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice						N			N					N		

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	5/10	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/11	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/12	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/13	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/14	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/15	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/16	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/17	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/18	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/19	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Non-Compliance Volume (Dth)			
	5/20	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/21	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/22	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/23	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/24	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/25	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/26	Issued 4/27/18 for 5/1/17 through 5/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	5/27	Issued on 5/25/17 for 5/27/17 through 5/30/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 22% PSP 26 12% PSP 35 16% PSP 36 21% PSP 38 33% PSP 39 13% PSP 40 5%	PSP 26 47% PSP 35 54% PSP 36 100% PSP 38 89% PSP 39 100% PSP 40 29% PSP 25 71%		N			Y	412.8	\$3,622.33	Y	115.0	\$1,009.11	
	5/28	Issued on 5/25/17 for 5/27/17 through 5/30/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 26% PSP 26 12% PSP 35 18% PSP 36 23% PSP 38 36% PSP 39 14% PSP 40 6%	PSP 26 51% PSP 35 60% PSP 36 100% PSP 38 95% PSP 39 100% PSP 40 33% PSP 25 81%		N			Y	396.3	\$3,477.54	Y	92.0	\$807.30	

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	5/29	Issued on 5/25/17 for 5/27/17 through 5/30/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 27% PSP 26 16% PSP 35 19% PSP 36 24% PSP 38 37% PSP 39 14% PSP 40 8%	PSP 26 66% PSP 35 63% PSP 36 100% PSP 38 99% PSP 39 100% PSP 40 44% PSP 25 84%			N		Y	32.5	\$285.19	Y	81.0	\$745.88	
	5/30	Issued on 5/25/17 for 5/27/17 through 5/30/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 27% PSP 26 16% PSP 35 19% PSP 36 24% PSP 38 37% PSP 39 14% PSP 40 8%	PSP 26 66% PSP 35 63% PSP 36 100% PSP 38 99% PSP 39 100% PSP 40 44% PSP 25 84%			N		Y	24.7	\$216.74	Y	54.0	\$473.85	
	5/31	Issued on 5/30/17 for 5/31/17 through 5/31/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 32% PSP 26 21% PSP 35 22% PSP 36 25% PSP 38 46% PSP 39 16% PSP 40 10%	PSP 26 87% PSP 35 73% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 50% PSP 25 100%	Order Lifted		N		N/A			N/A			
Jun-17	6/1	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice						N		N			N			
	6/2	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice						N		N			N			
	6/3	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice						N		N			N			
	6/4	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice						N		N			N			
	6/5	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice						N		N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFD							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	6/6	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N				N		
	6/7	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N				N		
	6/8	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N				N		
	6/9	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N				N		
	6/10	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N				N		
	6/11	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N				N		
	6/12	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N				N		
	6/13	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N				N		

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Penalty Amount			
	6/14	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/15	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/16	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/17	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/18	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/19	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/20	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/21	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	6/22	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/23	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/24	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/25	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/26	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/27	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/28	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	6/29	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			

<A> Month	<B> Day	<C> Order Issue Date	<D> Reason	<E> Customer Class	<F> GDS		<H> Choice PSP Restriction	<I> Other	<J> Columbia	<K> Columbia Non-Compliance Volume (Dth)	<L> Columbia Penalty Amount	<M> Penalties			<O> Choice Suppliers	<P> Choice Non-Compliance Volume (Dth)	<Q> Choice Penalty Amount
					<F> OMO	<G> OFO						<N> GDS Non-Compliance Volume (Dth)	<O> GDS Penalty Amount	<M> GDS Suppliers			
	6/30	Issued on 5/31/17 for 5/31/17 through 6/30/17	TCO Storage Bounce	GDS & Choice					N				N		N		
Jul-17	7/1	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		
	7/2	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		
	7/3	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		
	7/4	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		
	7/5	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		
	7/6	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		
	7/7	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		
	7/8	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		
	7/9	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N				N		N		

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	7/10	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/11	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/12	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/13	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/14	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/15	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/16	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/17	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/18	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	7/19	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMD	OFO											
	7/20	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	7/21	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	7/22	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	7/23	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	7/24	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	7/25	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	7/26	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	7/27	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	7/28	Issued on 6/27/17 for 7/1/17 through 7/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties				
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
	7/29	Issued on 7/28/17 for 7/29/17 through 7/31/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 16% PSP 26 6% PSP 35 15% PSP 36 23% PSP 38 21% PSP 39 10% PSP 40 4%	PSP 26 11% PSP 35 28% PSP 36 53% PSP 38 8% PSP 39 49% PSP 40 12% PSP 25 24%		N			Y	3,098.0	\$26,209.08	Y	301.0	\$2,546.46
	7/30	Issued on 7/28/17 for 7/29/17 through 7/31/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 16% PSP 26 7% PSP 35 17% PSP 36 23% PSP 38 21% PSP 39 10% PSP 40 4%	PSP 26 13% PSP 35 31% PSP 36 54% PSP 38 8% PSP 39 47% PSP 40 12% PSP 25 25%		N			Y	1,159.8	\$9,811.91	Y	294.0	\$2,487.24
	7/31	Issued on 7/28/17 for 7/29/17 through 7/31/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 23% PSP 26 9% PSP 35 17% PSP 36 25% PSP 38 20% PSP 39 11% PSP 40 4%	PSP 26 18% PSP 35 31% PSP 36 58% PSP 38 8% PSP 39 51% PSP 40 12% PSP 25 35%	Order Lifted	N			N/A			N/A		
Aug-17	8/1	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/2	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/3	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/4	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/5	Issued on 8/4/17 for 8/5/17 through 8/7/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 20% PSP 26 5% PSP 35 13% PSP 36 22% PSP 38 23% PSP 39 8% PSP 40 3%	PSP 26 11% PSP 35 26% PSP 36 51% PSP 38 10% PSP 39 45% PSP 40 12% PSP 25 31%		N			Y	777.0	\$6,107.21	Y	433.0	\$3,403.38

<A> Month	<B> Day	<C> Order Issue Date	<D> Reason	<E> Customer Class	<F> GDS		<H> Choice PSP Restriction	<I> Other	<J> Columbia	<K> Columbia Non-Compliance Volume (Dth)	<L> Columbia Penalty Amount	<M> GDS Suppliers	<N> Penalties			<P> Choice Suppliers	<Q> Choice Non-Compliance Volume (Dth)	<R> Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	8/6	Issued on 8/4/17 for 8/5/17 through 8/7/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 22% PSP 26 7% PSP 35 15% PSP 36 23% PSP 38 24% PSP 39 8% PSP 40 3%	PSP 26 13% PSP 35 29% PSP 36 53% PSP 38 10% PSP 39 44% PSP 40 12% PSP 25 34%		N			Y	14.6	\$114.75	Y	421.0	\$3,309.06	
	8/7	Issued on 8/4/17 for 8/5/17 through 8/7/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 27% PSP 26 9% PSP 35 15% PSP 36 25% PSP 38 24% PSP 39 8% PSP 40 3%	PSP 26 17% PSP 35 31% PSP 36 58% PSP 38 10% PSP 39 44% PSP 40 12% PSP 25 44%	Order Lifted	N			N/A			N/A			
	8/8	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	8/9	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	8/10	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	8/11	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	8/12	Issued on 8/11/17 for 8/12/17 through 8/14/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 19% PSP 26 6% PSP 35 13% PSP 36 21% PSP 38 24% PSP 39 9% PSP 40 3%	PSP 26 11% PSP 35 26% PSP 36 48% PSP 38 10% PSP 39 47% PSP 40 12% PSP 25 30%		N			Y	107.4	\$905.38	Y	292.0	\$2,461.56	
	8/13	Issued on 8/11/17 for 8/12/17 through 8/14/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 22% PSP 26 7% PSP 35 14% PSP 36 23% PSP 38 24% PSP 39 9% PSP 40 3%	PSP 26 14% PSP 35 29% PSP 36 53% PSP 38 10% PSP 39 46% PSP 40 12% PSP 25 35%		N			Y	24.1	\$203.16	Y	280.0	\$2,360.40	

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount	
					DMO	OFO												
	8/14	Issued on 8/11/17 for 8/12/17 through 8/14/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 27% PSP 26 9% PSP 35 15% PSP 36 25% PSP 38 25% PSP 39 9% PSP 40 3%	PSP 26 18% PSP 35 30% PSP 36 56% PSP 38 11% PSP 39 46% PSP 40 12% PSP 25 44%	Order Lifted		N		N/A			N/A			
	8/15	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	8/16	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	8/17	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	8/18	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	8/19	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	8/20	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	8/21	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	8/22	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO											
	8/23	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/24	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/25	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/26	Issued on 8/25/17 for 8/26/17 through 8/28/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 31% PSP 26 15% PSP 35 28% PSP 36 33% PSP 38 40% PSP 39 19% PSP 40 6%	PSP 26 14% PSP 35 28% PSP 36 54% PSP 38 10% PSP 39 54% PSP 40 12% PSP 25 29%		N			Y	302.7	\$2,470.04	N		
	8/27	Issued on 8/25/17 for 8/26/17 through 8/28/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 35% PSP 26 17% PSP 35 29% PSP 36 33% PSP 38 44% PSP 39 19% PSP 40 6%	PSP 26 16% PSP 35 29% PSP 36 53% PSP 38 11% PSP 39 53% PSP 40 12% PSP 25 33%		N			Y	20.9	\$170.55	N		
	8/28	Issued on 8/25/17 for 8/26/17 through 8/28/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 44% PSP 26 18% PSP 35 31% PSP 36 36% PSP 38 44% PSP 39 19% PSP 40 6%	PSP 26 17% PSP 35 31% PSP 36 59% PSP 38 11% PSP 39 53% PSP 40 12% PSP 25 41%	Order Lifted	N			N/A			N/A		
	8/29	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/30	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		
	8/31	Issued on 7/31/17 for 8/1/17 through 8/31/17	TCO Storage Bounce	GDS & Choice					N			N			N		

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					OMO	OFO						GDS Suppliers	GDS Non-Compliance Volume (Dth)	GDS Penalty Amount			
Sep-17	9/1	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N					
	9/2	Issued on 9/1/17 for 9/2/17 through 9/5/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 47% PSP 26 16% PSP 35 27% PSP 36 36% PSP 38 52% PSP 39 16% PSP 40 13%	PSP 26 69% PSP 35 36% PSP 36 83% PSP 38 37% PSP 39 59% PSP 40 29% PSP 25 37%		N			Y	31.4	\$257.63	N	0.0	\$0.00
	9/3	Issued on 9/1/17 for 9/2/17 through 9/5/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 45% PSP 26 16% PSP 35 28% PSP 36 36% PSP 38 55% PSP 39 16% PSP 40 12%	PSP 26 69% PSP 35 37% PSP 36 83% PSP 38 39% PSP 39 59% PSP 40 28% PSP 25 35%		N			Y	18.0	\$147.69	N	0.0	\$0.00
	9/4	Issued on 9/1/17 for 9/2/17 through 9/5/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 48% PSP 26 16% PSP 35 28% PSP 36 38% PSP 38 52% PSP 39 17% PSP 40 9%	PSP 26 69% PSP 35 37% PSP 36 87% PSP 38 37% PSP 39 61% PSP 40 22% PSP 25 38%		N			Y	130.0	\$1,066.65	N	0.0	\$0.00
	9/5	Issued on 9/1/17 for 9/2/17 through 9/5/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 54% PSP 26 16% PSP 35 32% PSP 36 43% PSP 38 55% PSP 39 20% PSP 40 8%	PSP 26 69% PSP 35 42% PSP 36 97% PSP 38 39% PSP 39 73% PSP 40 18% PSP 25 43%	Order Lifted	N			N/A			N/A		
	9/6	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N		
	9/7	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N		
	9/8	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N		

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties				
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
	9/9	Issued on 9/8/17 for 9/9/17 through 9/11/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 31% PSP 26 15% PSP 35 26% PSP 36 31% PSP 38 40% PSP 39 17% PSP 40 16%	PSP 26 93% PSP 35 58% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 47% PSP 25 65%		N			Y	68.3	\$544.02	N		
	9/10	Issued on 9/8/17 for 9/9/17 through 9/11/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 36% PSP 26 15% PSP 35 27% PSP 36 30% PSP 38 39% PSP 39 16% PSP 40 14%	PSP 26 93% PSP 35 62% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 41% PSP 25 74%		N			Y	40.4	\$321.79	N		
	9/11	Issued on 9/8/17 for 9/9/17 through 9/11/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 43% PSP 26 17% PSP 35 28% PSP 36 33% PSP 38 40% PSP 39 17% PSP 40 10%	PSP 26 87% PSP 35 55% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 24% PSP 25 77%	Order Lifted	N			N/A			N/A		
	9/12	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N		
	9/13	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N		
	9/14	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N		
	9/15	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N		
	9/16	Issued on 9/15/17 for 9/16/17 through 9/18/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 27% PSP 26 16% PSP 35 20% PSP 36 27% PSP 38 28% PSP 39 13% PSP 40 6%	PSP 26 93% PSP 35 44% PSP 36 100% PSP 38 90% PSP 39 85% PSP 40 17% PSP 25 54%		N			Y	58.0	\$482.85	N	0.0	\$0.00

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	9/17	Issued on 9/15/17 for 9/16/17 through 9/18/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 31% PSP 26 16% PSP 35 22% PSP 36 27% PSP 38 28% PSP 39 12% PSP 40 6%	PSP 26 93% PSP 35 48% PSP 36 100% PSP 38 90% PSP 39 81% PSP 40 17% PSP 25 63%		N			Y	100.6	\$837.49	N	0.0	\$0.00	
	9/18	Issued on 9/15/17 for 9/16/17 through 9/18/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 40% PSP 26 18% PSP 35 25% PSP 36 31% PSP 38 34% PSP 39 15% PSP 40 7%	PSP 26 88% PSP 35 47% PSP 36 100% PSP 38 91% PSP 39 92% PSP 40 17% PSP 25 71%	Order Lifted	N			N/A			N/A			
	9/19	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	9/20	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	9/21	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	9/22	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	9/23	Issued on 9/22/17 for 9/23/17 through 9/25/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 27% PSP 26 14% PSP 35 18% PSP 36 25% PSP 38 32% PSP 39 11% PSP 40 4%	PSP 26 84% PSP 35 42% PSP 36 100% PSP 38 100% PSP 39 73% PSP 40 14% PSP 25 56%		N			Y	1,091.2	\$9,280.65	N	0.0	\$0.00	
	9/24	Issued on 9/22/17 for 9/23/17 through 9/25/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 30% PSP 26 14% PSP 35 20% PSP 36 24% PSP 38 31% PSP 39 11% PSP 40 3%	PSP 26 84% PSP 35 45% PSP 36 100% PSP 38 100% PSP 39 71% PSP 40 10% PSP 25 63%		N			Y	615.7	\$5,236.53	N	0.0	\$0.00	

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	9/25	Issued on 9/22/17 for 9/23/17 through 9/25/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 40% PSP 26 17% PSP 35 23% PSP 36 28% PSP 38 36% PSP 39 14% PSP 40 4%	PSP 26 87% PSP 35 44% PSP 36 100% PSP 38 95% PSP 39 86% PSP 40 10% PSP 25 71%	Order Lifted	N			N/A				N/A		
	9/26	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	9/27	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	9/28	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	9/29	Issued on 8/30/17 for 9/1/17 through 9/30/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	9/30	Issued on 9/28/17 for 9/30/17 through 10/2/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 28% PSP 26 23% PSP 35 23% PSP 36 33% PSP 38 34% PSP 39 17% PSP 40 16%	PSP 26 100% PSP 35 51% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 47% PSP 25 59%		N			N	0.0	\$0.00	N	0.0	\$0.00	
Oct-17	10/1	Issued on 9/28/17 for 9/30/17 through 10/2/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 30% PSP 26 21% PSP 35 18% PSP 36 30% PSP 38 32% PSP 39 14% PSP 40 20%	PSP 26 100% PSP 35 67% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 33% PSP 25 87%		N			Y	59.5	\$473.03	Y	-2.0	\$15.90	
	10/2	Issued on 9/28/17 for 9/30/17 through 10/2/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 40% PSP 26 22% PSP 35 22% PSP 36 31% PSP 38 35% PSP 39 15% PSP 40 16%	PSP 26 100% PSP 35 65% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 25% PSP 25 95%		N			Y	104.9	\$833.96	Y	-2.0	\$15.90	

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Penalty Amount			
	10/3	Issued on 10/2/17 for 10/3/17 through 10/4/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 58% PSP 26 40% PSP 35 31% PSP 36 37% PSP 38 42% PSP 39 26% PSP 40 9%	PSP 26 100% PSP 35 73% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 46% PSP 25 100%		N			Y	238.9	\$1,752.34	N	0.0	\$0.00	
	10/4	Issued on 10/2/17 for 10/3/17 through 10/4/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 55% PSP 26 32% PSP 35 28% PSP 36 35% PSP 38 41% PSP 39 24% PSP 40 4%	PSP 26 95% PSP 35 68% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 18% PSP 25 100%		N			Y	248.2	\$1,749.83	N	0.0	\$0.00	
	10/5	Issued on 10/4/17 for 10/5/17 through 10/5/17	TCO Storage Bounce	GDS & Choice	110% All PSP	PSP 25 44% PSP 26 32% PSP 35 29% PSP 36 30% PSP 38 50% PSP 39 24% PSP 40 4%	PSP 26 93% PSP 35 61% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 12% PSP 25 94%	Order Lifted	N			N/A			N/A			
	10/6	Issued on 9/27/17 for 10/1/17 through 10/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	10/7	Issued on 9/27/17 for 10/1/17 through 10/31/17	TCO Storage Bounce	GDS & Choice					N			N			N			
	10/8	Issued on 9/27/17 for 10/1/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/9	Issued on 9/27/17 for 10/1/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/10	Issued on 10/9/17 for 10/10/17 through 10/13/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Non-Compliance Volume (Dth)			
10/11	Issued on 10/10/17 for 10/11/17 through 10/13/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 43% PSP 26 33% PSP 35 31% PSP 36 40% PSP 38 48% PSP 39 21% PSP 40 6%				N			Y	287.6	\$2,322.74	N			
10/12	Issued on 10/10/17 for 10/11/17 through 10/13/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 45% PSP 26 35% PSP 35 31% PSP 36 37% PSP 38 49% PSP 39 22% PSP 40 8%				N			Y	157.5	\$1,278.12	N			
10/13	Issued on 10/10/17 for 10/11/17 through 10/13/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 36% PSP 26 31% PSP 35 27% PSP 36 34% PSP 38 47% PSP 39 18% PSP 40 5%				N			Y	107.6	\$866.72	N			
10/14	Issued on 10/13/17 for 10/14/17 through 10/16/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 28% PSP 26 17% PSP 35 20% PSP 36 45% PSP 38 37% PSP 39 18% PSP 40 7%				N			Y	1,858.1	\$14,939.13	N			
10/15	Issued on 10/13/17 for 10/14/17 through 10/16/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 30% PSP 26 28% PSP 35 28% PSP 36 48% PSP 38 41% PSP 39 22% PSP 40 8%				N			Y	109.4	\$879.58	N			
10/16	Issued on 10/13/17 for 10/14/17 through 10/16/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 47% PSP 26 56% PSP 35 47% PSP 36 40% PSP 38 60% PSP 39 32% PSP 40 9%				N			Y	78.6	\$631.94	N			
10/17	Issued on 10/16/17 for 10/17/17 through 10/20/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice						N			N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	DFD							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Non-Compliance Volume (Dth)			
	10/18	Issued on 10/16/17 for 10/17/17 through 10/20/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/19	Issued on 10/16/17 for 10/17/17 through 10/20/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/20	Issued on 10/16/17 for 10/17/17 through 10/20/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/21	Issued on 10/20/17 for 10/21/17 through 10/23/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 30% PSP 26 25% PSP 35 25% PSP 36 51% PSP 38 40% PSP 39 23% PSP 40 6%	PSP 26 94% PSP 35 63% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 19% PSP 25 77%		N			Y	105.4	\$485.06	N	0.0	\$0.00	
	10/22	Issued on 10/20/17 for 10/21/17 through 10/23/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 32% PSP 26 25% PSP 35 25% PSP 36 59% PSP 38 40% PSP 39 23% PSP 40 6%	PSP 26 94% PSP 35 64% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 19% PSP 25 83%		N			Y	91.0	\$425.14	N	0.0	\$0.00	
	10/23	Issued on 10/20/17 for 10/21/17 through 10/23/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice	110% All PSP	PSP 25 43% PSP 26 32% PSP 35 31% PSP 36 61% PSP 38 46% PSP 39 26% PSP 40 6%	PSP 26 92% PSP 35 64% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 19% PSP 25 91%	Order Lifted	N			N/A			N/A			
	10/24	Issued on 10/23/17 for 10/23/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/25	Issued on 10/23/17 for 10/23/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	10/26	Issued on 10/23/17 for 10/23/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/27	Issued on 10/23/17 for 10/23/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/28	Issued on 10/23/17 for 10/23/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/29	Issued on 10/23/17 for 10/23/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/30	Issued on 10/23/17 for 10/23/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	10/31	Issued on 10/23/17 for 10/23/17 through 10/31/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
Nov-17	11/1	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			
	11/2	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice					N			N			N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount		
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)					
	11/3	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice						N			N					N		
	11/4	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice						N			N					N		
	11/5	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice						N			N					N		
	11/6	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce Tennessee Limit of Scheduled Supplies	GDS & Choice						N			N					N		
	11/7	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce	GDS & Choice						N			N					N		
	11/8	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce TETCO Limit of Scheduled Supplies	GDS & Choice						N			N					N		
	11/9	Issued on 10/30/17 for 11/1/17 through 11/30/17	TCO Storage Bounce TETCO Limit of Scheduled Supplies	GDS & Choice						N			N					N		
Dec-17	12/13		Tennessee Limit of Scheduled Supplies							N			N					N		
	12/14		Tennessee Limit of Scheduled Supplies TETCO Limit of Scheduled Supplies							Y	43	\$487.62	N					N		

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Penalty Amount			
	12/15		Tennessee Limit of Scheduled Supplies TETCO Limit of Scheduled Supplies						N			N			N			
	12/16		TETCO Limit of Scheduled Supplies						N			N			N			
	12/17		TETCO Limit of Scheduled Supplies						N			N			N			
	12/21		Tennessee Limit of Scheduled Supplies						N			N			N			
	12/25		TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies						Y	356	\$3,791.40	N			N			
	12/26		TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies						Y	809	\$8,615.85	N			N			
	12/27	Issued on 12/26/17 for 12/27/17 through 12/27/17	TCO Critical Day Transport Opp 1,4 &10 TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100%	PSP 25 85%			Y	2,252	\$85,226.94	N	0.0	\$0.00	N			
	12/28	Issued on 12/27/17 for 12/28/17 through 12/31/17	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 86% PSP 26 97% PSP 35 83% PSP 36 89% PSP 38 70% PSP 39 58% PSP 40 100%			Y	349	\$19,662.66	Y	77.1	\$1,154.32	N			
	12/29	Issued on 12/27/17 for 12/28/17 through 12/31/17	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 74% PSP 26 82% PSP 35 73% PSP 36 84% PSP 38 63% PSP 39 52% PSP 40 91%			N			Y	10.9	\$153.44	N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount		
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount						
	12/30	Issued on 12/27/17 for 12/28/17 through 12/31/17	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 67% PSP 26 86% PSP 35 77% PSP 36 83% PSP 38 66% PSP 39 59% PSP 40 100%			N			Y	11.3	\$98.31	N					
	12/31	Issued on 12/27/17 for 12/28/17 through 12/31/17	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 75% PSP 26 100% PSP 35 89% PSP 36 89% PSP 38 72% PSP 39 66% PSP 40 100%			N			Y	200.6	\$8,470.49	N					
Jan-18	1/1	Issued on 12/29/17 for 1/1/18 through 1/2/18	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 86% PSP 26 100% PSP 35 91% PSP 36 91% PSP 38 68% PSP 39 66% PSP 40 100%			N			Y	1,048.5	\$84,955.06	Y	8.0	\$682.92			
	1/2	Issued on 12/29/17 for 1/1/18 through 1/2/18	TCO Critical Day Transport All Opp TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 80% PSP 29 100% PSP 26 90% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 90% PSP 40 90%	PSP 25 82% PSP 26 100% PSP 35 87% PSP 36 87% PSP 38 66% PSP 39 64% PSP 40 100%			Y	243	\$24,388.70	Y	1,824.7	\$146,485.93	Y	8.0	\$682.92			
	1/3	Issued on 1/2/18 for 1/3/18 through 1/5/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 90% PSP 29 100% PSP 26 100% PSP 35 100% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 100%	PSP 25 83% PSP 26 100% PSP 35 91% PSP 36 81% PSP 38 79% PSP 39 60% PSP 40 100%			N			Y	1,681.2	\$81,350.31	N					
	1/4	Issued on 1/2/18 for 1/3/18 through 1/5/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100% PSP 26 100% PSP 35 100% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 100%	PSP 25 100% PSP 26 100% PSP 35 100% PSP 36 86% PSP 38 87% PSP 39 70% PSP 40 100%			Y	599	\$91,548.17	Y	1,876.3	\$247,124.86	N					

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Non-Compliance Volume (Dth)			
	1/5	Issued on 1/2/18 for 1/3/18 through 1/5/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100% PSP 26 100% PSP 35 100% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 100%	PSP 25 100% PSP 26 100% PSP 35 100% PSP 36 96% PSP 38 95% PSP 39 72% PSP 40 100%			Y	1,152	\$345,565.44	Y	2,656.6	\$728,037.64	N			
	1/6	Issued on 1/5/18 for 1/6/18 through 1/6/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100% PSP 26 100% PSP 35 100% PSP 36 100% PSP 38 100% PSP 39 100% PSP 40 100%	PSP 25 100% PSP 26 100% PSP 35 100% PSP 36 100 PSP 38 92% PSP 39 73% PSP 40 100%			Y	685	\$51,436.65	Y	2,053.2	\$117,760.81	N			
	1/7	Issued on 1/5/18 for 1/7/18 through 1/7/18	TCO Critical Day Transport All Opp TCO Storage Critical Day TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies Equitrans Limit of Scheduled Supplies	GDS	PSP 25 90% PSP 29 100%	PSP 25 82%			N			Y	162.9	\$9,788.66	N			
	1/8		TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies						N			N			N			
	1/9		TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies						N			N			N			
	1/10		TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies						N			N			N			
	1/13		TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies						N			N			N			
	1/14	Issued on 1/12/18 for 1/14/18 through 1/16/18	TCO Critical Day Transport Opp 1,4 & 10 TCO Storage Critical Day Opp 1,4 & 10 TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100%	PSP 25 90%			N			Y	1,153.7	\$51,968.42	N			
	1/15	Issued on 1/12/18 for 1/14/18 through 1/16/18	TCO Critical Day Transport Opp 1,4 & 10 TCO Storage Critical Day Opp 1,4 & 10 TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100%	PSP 25 94%			N			Y	8.9	\$400.90	N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFD							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Non-Compliance Volume (Dth)			
	1/16	Issued on 1/12/18 for 1/14/18 through 1/16/18	TCO Critical Day Transport Opp 1,4 & 10 TCO Storage Critical Day Opp 1,4 & 10 TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 100% PSP 29 100%	PSP 25 95%			N			Y	4.0	\$180.18	N			
	1/17	Issued on 1/16/18 for 1/17/18 through 1/18/18	TCO Critical Day Transport Opp 1,4 & 10 TCO Storage Critical Day Opp 1,4 & 10 TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 90% PSP 29 100%	PSP 25 86%			N			Y	9.9	\$295.52	N			
	1/18	Issued on 1/16/18 for 1/17/18 through 1/18/18	TCO Critical Day Transport Opp 1,4 & 10 TCO Storage Critical Day Opp 1,4 & 10 TETCO Limit of Scheduled Supplies Dominion Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies	GDS	PSP 25 90% PSP 29 100%	PSP 25 77%			N			Y	75.9	\$1,761.26	N			
	1/19		TETCO Limit of Scheduled Supplies						N			N			N			
	1/25		Dominion Limit of Scheduled Supplies						N			N			N			
	1/26		Dominion Limit of Scheduled Supplies						N			N			N			
	1/29		Dominion Limit of Scheduled Supplies						N			N			N			
	1/30		Dominion Limit of Scheduled Supplies TETECO Limit of Scheduled Supplies Tennessee Limit of Scheduled Supplies						N			N			N			
	1/31		Dominion Limit of Scheduled Supplies TETECO Limit of Scheduled Supplies						N			N			N			
Feb-18	2/2	Issued on 2/1/18 for 2/2/18 through 2/2/18	TCO Critical Day Transport Opp 1,4 & 10 TCO Storage Critical Day Opp 1,4 & 10	GDS	PSP 25 90% PSP 29 100%	PSP 25 89%			N			Y	12.7	\$278.70	N			
	2/3	Issued on 2/2/18 for 2/3/18 through 2/3/18	TCO Critical Day Transport Opp 1,4 & 10 TCO Storage Critical Day Opp 1,4 & 10	GDS	PSP 25 90% PSP 29 100%	PSP 25 67%			N			Y	3.6	\$41.80	N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	DFD							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount				
Mar-18	3/11	Issued on 3/9/18 for 3/11/18 through 3/13/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 90% PSP 29 100% PSP 26 90% PSP 35 90% PSP 36 100% PSP 38 90% PSP 39 90% PSP 40 90 %	PSP 25 51% PSP 26 67% PSP 35 65% PSP 36 71% PSP 38 52% PSP 39 34% PSP 40 74 %			N			Y	10.5	\$86.16	N			
	3/12	Issued on 3/9/18 for 3/11/18 through 3/13/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 90% PSP 29 100% PSP 26 90% PSP 35 90% PSP 36 100% PSP 38 90% PSP 39 90% PSP 40 90 %	PSP 25 65% PSP 26 76% PSP 35 74% PSP 36 71% PSP 38 52% PSP 39 37% PSP 40 74 %			N			Y	84.7	\$694.97	N			
	3/13	Issued on 3/9/18 for 3/11/18 through 3/13/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 90% PSP 29 100% PSP 26 90% PSP 35 90% PSP 36 100% PSP 38 90% PSP 39 90% PSP 40 90 %	PSP 25 67% PSP 26 82% PSP 35 79% PSP 36 73% PSP 38 55% PSP 39 39% PSP 40 85 %			N			Y	112.1	\$1,014.44	N			
	3/14	Issued on 3/13/18 for 3/14/18 through 3/14/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 60% PSP 26 60% PSP 35 70% PSP 36 73% PSP 38 47% PSP 39 36% PSP 40 73 %			N			Y	815.8	\$7,990.75	N			
	3/15	Issued on 3/14/18 for 3/15/18 through 3/15/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 55% PSP 26 54% PSP 35 68% PSP 36 72% PSP 38 47% PSP 39 35% PSP 40 67 %			N			Y	65.5	\$545.30	N			
	3/16	Issued on 3/15/18 for 3/16/18 through 3/16/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 56% PSP 26 65% PSP 35 70% PSP 36 77% PSP 38 50% PSP 39 35% PSP 40 77 %			N			Y	150.3	\$1,287.32	N			

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount				
	3/17	Issued on 3/16/18 for 3/17/18 through 3/19/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 42% PSP 26 55% PSP 35 57% PSP 36 70% PSP 38 46% PSP 39 31% PSP 40 65 %			N			Y	8.9	\$70.49		N		
	3/18	Issued on 3/16/18 for 3/17/18 through 3/19/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 42% PSP 26 50% PSP 35 52% PSP 36 69% PSP 38 44% PSP 39 29% PSP 40 57 %			N			Y	8.6	\$68.11		N		
	3/19	Issued on 3/16/18 for 3/17/18 through 3/19/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 49% PSP 26 45% PSP 35 51% PSP 36 68% PSP 38 41% PSP 39 29% PSP 40 45 %			N			Y	8.3	\$65.74		N		
	3/20	Issued on 3/19/18 for 3/20/18 through 3/20/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 56% PSP 26 63% PSP 35 62% PSP 36 69% PSP 38 45% PSP 39 33% PSP 40 68 %			N			Y	34.1	\$286.36		N		
	3/21	Issued on 3/20/18 for 3/21/18 through 3/21/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 51% PSP 26 67% PSP 35 66% PSP 36 70% PSP 38 56% PSP 39 34% PSP 40 62 %			N			Y	33.7	\$316.94		N		
	3/22	Issued on 3/21/18 for 3/22/18 through 3/23/18	TCO Critical Day Transport All Opp TCO Storage Critical Day All Opp	GDS	PSP 25 80% PSP 29 100% PSP 26 80% PSP 35 80% PSP 36 100% PSP 38 80% PSP 39 80% PSP 40 80 %	PSP 25 57% PSP 26 64% PSP 35 70% PSP 36 70% PSP 38 48% PSP 39 36% PSP 40 74% PSP 40 80 %			N			Y	8.9	\$72.22		N		

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Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	Penalties			Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO							GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	GDS Non-Compliance Volume (Dth)			
	3/23	Issued on 3/21/18 for 3/22/18 through 3/23/18	TCO Critical Day Transport Opp 1,4 & 10 TCO Storage Critical Day Opp 1,4 & 10	GDS	PSP 25 80% PSP 29 100%	PSP 25 57%		Order for Opp 8 Lifted	N			N	0.0	\$0.00	N			
Apr-18	4/1	Issued on 3/28/18 for 4/1/18 through 4/30/18	TCO Storage Bounce OA 1,4,8,&10	GDS & Choice					N			N			N			
	4/2	Issued on 3/28/18 for 4/1/18 through 4/30/18	TCO Storage Bounce OA 1,4,8,&10	GDS & Choice					N			N			N			
	4/3	Issued on 3/28/18 for 4/1/18 through 4/30/18	TCO Storage Bounce OA 1,4,8,&10	GDS & Choice					N			N			N			
	4/4	Issued on 3/28/18 for 4/1/18 through 4/30/18	TCO Storage Bounce OA 1,4,8,&10	GDS & Choice					N			N			N			
	4/5	Issued on 3/28/18 for 4/1/18 through 4/30/18	TCO Storage Bounce OA 1,4,8,&10	GDS & Choice					N			N			N			
	4/6	Issued on 3/28/18 for 4/1/18 through 4/30/18	TCO Storage Bounce OA 1,4,8,&10	GDS & Choice					N			N			N			
	4/7	Issued on 4/6/18 for 4/7/18 through 4/9/18	TCO Storage Critical Day OA 1,4, & 10 TCO Transport Critical Day OA 1,4, & 10	GDS & Choice	PSP 25 80% PSP 29 100%	PSP 25 77%		TCO Bounce not in place for OA in Storage / Trans order	N			Y	6.5	\$56.55	N			

<A>	<B>	<C>	<D>	<E>	<F>	<G>	<H>	<I>	<J>	<K>	<L>	<M>	<N>	<O>	<P>	<Q>	<R>
Month	Day	Order Issue Date	Reason	Customer Class	GDS		Choice PSP Restriction	Other	Columbia	Columbia Non-Compliance Volume (Dth)	Columbia Penalty Amount	GDS Suppliers	GDS Non-Compliance Volume (Dth)	GDS Penalty Amount	Choice Suppliers	Choice Non-Compliance Volume (Dth)	Choice Penalty Amount
					OMO	OFO											
	4/8	Issued on 4/6/18 for 4/7/18 through 4/9/18	TCO Storage Critical Day OA 1,4, & 10 TCO Transport Critical Day OA 1,4, & 10	GDS & Choice	PSP 25 80% PSP 29 100%	PSP 25 83%		TCO Bounce not in place for OA in Storage / Trans order	N			Y	7.5	\$65.25	N		
	4/9	Issued on 4/6/18 for 4/7/18 through 4/9/18	TCO Storage Critical Day OA 1,4, & 10 TCO Transport Critical Day OA 1,4, & 10	GDS & Choice	PSP 25 80% PSP 29 100%	PSP 25 94%		TCO Bounce not in place for OA in Storage / Trans order	N			N	0.0	\$0.00	N		
	4/10	Issued on 4/9/18 for 4/10/18 through 4/10/18	TCO Storage Critical Day OA 1,4, & 10 TCO Transport Critical Day OA 1,4, & 10	GDS & Choice	PSP 25 80% PSP 29 100%	PSP 25 87%		TCO Bounce not in place for OA in Storage / Trans order	N			Y	13.1	\$102.97	N		
	4/11	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N			N		
	4/12	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N			N		
	4/13	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N			N		
	4/14	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N			N		

<A> Month	<B> Day	<C> Order Issue Date	<D> Reason	<E> Customer Class	<F> GDS		<H> Choice PSP Restriction	<I> Other	<J> Columbia	<K> Columbia Non-Compliance Volume (Dth)	<L> Columbia Penalty Amount	<N> Penalties					<Q> Choice Penalty Amount	
					<F> OMO	<G> OFO						<M> GDS Suppliers	<N> GDS Non-Compliance Volume (Dth)	<O> GDS Penalty Amount	<P> Choice Suppliers	<Q> Choice Non-Compliance Volume (Dth)		
	4/15	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N				N		
	4/16	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N				N		
	4/17	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N				N		
	4/18	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N				N		
	4/19	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 1,4,8, & 10	GDS & Choice					N			N				N		
	4/20	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice				OA 1,4 & 10 not in effect for Bounce order until further notice	N			N				N		
	4/21	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N				N		
	4/22	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N				N		

<A> Month	<B> Day	<C> Order Issue Date	<D> Reason	<E> Customer Class	<F> GDS		<H> Choice PSP Restriction	<I> Other	<J> Columbia	<K> Columbia Non-Compliance Volume (Dth)	<L> Columbia Penalty Amount	<N> Penalties					
					<F> OMO	<G> OFO						<M> GDS Suppliers	<N> GDS Non-Compliance Volume (Dth)	<O> GDS Penalty Amount	<P> Choice Suppliers	<Q> Choice Non-Compliance Volume (Dth)	<R> Choice Penalty Amount
	4/23	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N			N		
	4/24	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N			N		
	4/25	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N			N		
	4/26	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N			N		
	4/27	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N			N		
	4/28	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N			N		
	4/29	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N			N		
	4/30	Issued on 4/10/18 for 4/11/18 through 4/30/18	TCO Storage Bounce OA 8	GDS & Choice					N			N			N		

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 1

Question No. NGS Parties 1-001:

How many operational flow orders and/or operational matching orders did Columbia impose:

- a. For the period March 1, 2017 to March 1, 2018?
- b. For the period November 1, 2013 to March 1, 2017?
- c. For each event listed in response to a & b, provide the following:
  - i. the reason for the event including the identity of interstate pipelines that were involved;
  - ii. the impacted delivery points including any impacted interstate pipelines;
  - iii. the duration of the event; and
  - iv. whether any penalties to Columbia or any active suppliers resulted from said event.

Response:

- a. & b. Please see the following table<sup>1</sup>:

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<sup>1</sup> Please note that the column referring to days with Choice PSP Restrictions refers to the number of days CHOICE NGS were provided a maximum identified volume for delivery to Columbia's city gates with the remainder delivered to the Transit point for Columbia set up by Columbia Gas Transmission, LLC ("CPG"). This did not alter the CHOICE NGS delivery requirements to Columbia and was set forth to enable Columbia to maintain compliance with CPG's operational orders limiting city gate over nominations.

Dates		Number of Days with Pipeline Orders	Number of Days with CPA OMO	Number of Days with CPA OFO	Number of Days with Choice PSP Restrictions
Nov-13	Mar-14	47	38	38	0
Nov-14	Mar-15	48	44	44	18
Nov-15	Mar-16	53	39	39	30
Nov-16	Mar-17	77	27	27	0
Nov-17	Mar-18	59	32	32	0
Summer 2014		123	123	123	123
Summer 2015		214	0	0	169
Summer 2016		214	9	9	21
Summer 2017		214	39	39	33

- c. Please see Attachment A to this response. Note that prior to January 2017 the company did not track pipeline flow orders for pipelines other than Columbia Gas Transmission.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 1

Question No. NGS Parties 1-002:

What portion of Columbia's residential load (as an absolute amount and percentage) is supplied by natural gas suppliers?

Response:

As of January 31, 2018, the following load factors represent the portion of Columbia's residential load supplied by natural gas suppliers: 18.8% and 1,473,369 Mcf.

COLUMBIA GAS OF PENNSYLVANIA INC.

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Data Requests

NGS Parties – Set 1

Question No. NGS Parties 1-003:

What portion of Columbia's commercial load (as an absolute amount and percentage) is supplied by natural gas suppliers?

Response:

As of January 31, 2018, the following load factors represent the portion of Columbia's commercial load supplied by natural gas suppliers: 53.7% and 2,427,162 Mcf.

COLUMBIA GAS OF PENNSYLVANIA INC.

R-2018-2647577

Data Requests

NGS Parties – Set 1

Question No. NGS Parties 1-004:

What portion of Columbia's industrial load (as an absolute amount and percentage) is supplied by natural gas suppliers?

Response:

As of January 31, 2018, the following load factors represent the portion of Columbia's industrial load supplied by natural gas suppliers: 98.6% and 2,171,088 Mcf.