rates including the commodity while over deliveries were "banked" on the LDC. This resulted in large "banks" being developed for transporters who sought to avoid running into the more expensive "tariff gas" and caused issues for both the LDC and the transporters. Those problems were worked out between the LDC (at that time, KPL Gas Service) and representatives of Midwest.

c. In the early 1990s, the Federal Energy Regulatory Commission (FERC) mandated unbundling at the interstate level through its Order 636[2/] and numerous revisions to that initial order. Through extended negotiations including the pipeline's involvement in a KPL Gas Service Missouri rate case, an arrangement for "burner tip balancing" was worked out which involved, on one hand, the transportation customers paying for the electronic metering equipment needed so that the pipeline could read their meters remotely as often as desired,[3/] and the pipeline's agreement to accept the volumes actually delivered to the transporter as their nomination for the corresponding period. This eliminated imbalances on the LDC system and any imbalances and resolution procedures were left to the pipeline under its

[2/] Pipeline Service Obligations and Revisions to Regulations Governing Self-Implementing Transportation; and Regulation of Natural Gas Pipelines After Partial Wellhead Decontrol, [Regs. Preambles Jan. 1991-June 1996] FERC Stats. & Regs. ¶ 30,939 (1992), order on reh'g, Order No. 636-A, [Regs. Preambles Jan. 1991-June 1992] FERC Stats. & Regs. ¶ 30,950 (1992), order on reh'g, Order No. 636-B, 61 FERC ¶ 61,272 (1992), reh'g denied, 62 FERC ¶ 61,007 (1993).

[3/] Pursuant to its tariff, any new MGE transportation customers still must foot the bill for this equipment, although with technology, the cost has gone down somewhat over the years. See, *e.g.*, Sheet No. 71 in MGE's current tariff.