

**Exhibit A-1 – Affidavit of Tatiana Earhart in Support
of Motion for Summary Determination**

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Symmetry Energy Solutions, LLC,)	
)	
Complainant,)	
)	
v.)	File No. GC-2022-0062
)	
Empire District Gas Company d/b/a)	
Liberty Utilities or Liberty,)	
)	
Respondent.)	

**AFFIDAVIT OF TATIANA EARHART IN SUPPORT OF
MOTION FOR SUMMARY DETERMINATION**

STATE OF MISSOURI)
)ss
County of Jasper)

I, Tatiana Earhart, being first duly sworn, state as follows:

1. My name is Tatiana Earhart. I am the Gas Transportation Supervisor for Liberty Utilities Service Corp., which provides services to and serves as an agent of The Empire District Gas Company d/b/a Liberty Utilities or Liberty (“Empire”). My business address is 602 S. Joplin Ave., Joplin, Missouri 64801.

2. I have been employed by Liberty Utilities Service Corp. or its predecessor-in-interest since December of 2008. Prior to becoming the Gas Transportation Supervisor, I worked as a Gas Transportation Analyst, Supply Management Specialist, and Internal Auditor. In my role as Gas Transportation Supervisor it is my responsibility to maintain the integrity of Empire’s local gas distribution system and its storage facilities so that Empire can reliably deliver affordable natural gas to its customers.

3. Under Empire’s Tariff that is on file with the Missouri Public Service Commission (the “Commission”), Empire provides a transportation service that allows non-residential customers to contract with natural gas marketers or aggregators who will arrange for the delivery of natural gas to them over Empire’s local gas distribution system. The marketers or aggregators are required to enter into a marketer/aggregator agreement with Empire, comply with the terms of Empire’s Tariff, and are responsible for delivering their gas to the city gate. Once the marketer’s gas reaches the city gate Empire will deliver it over its local gas distribution system to the marketer’s customers.

4. Marketers and aggregators are responsible for keeping their accounts in balance—meaning that the amount of gas they deliver to the city gate or nominate is equal to the amount of gas their customers burn. In the event a marketer or aggregator’s account is out of balance, Empire must either provide gas on its behalf from Empire’s storage facilities or use its storage facilities to store excess gas shipped by the marketer or aggregator. Marketers and aggregators are required to keep their accounts balanced on both a daily and monthly basis. Customers that do not keep their accounts in balance are subject to both daily and monthly imbalance charges.

5. It is always important to keep Empire’s system in balance but there are times when certain events make doing so difficult. Empire’s Tariff, however, allows it to call an Operational Flow Order (“OFO”) that “will require actions by the Customer to alleviate conditions, that, in the sole judgment of [Empire], jeopardize the operational integrity of [Empire’s] system required to maintain system reliability.”¹ Empire can call an OFO when, in its sole judgement, any of the following conditions are present:

- [Empire] experiences failure of transmission, distribution or gas storage facilities;

¹ Tariff, Sheet No. 43.

- When transmission system pressures or other unusual conditions jeopardize the operation of [Empire's] system;
- When [Empire's] transportation, storage and supply resources are being used at or near their maximum rate deliverability;
- When any of [Empire's] transporters or suppliers call the equivalent of an OFO or Critical Day;
- When [Empire] is unable to fulfill its firm contractual obligations or otherwise when necessary to maintain the overall operational integrity of all or a portion of [Empire's] system.²

When Empire calls an OFO it is essential that customers, aggregators, and marketers comply with the directions provided in the OFO, which will be to either not burn any amount in excess of the gas that is being delivered (i.e. an Unauthorized Delivery) or to not deliver any more gas than is being burned (i.e. an Unauthorized Receipt).

6. Because OFOs are called at times when it is critical to maintain Empire's system integrity, it is essential that customers, marketers, and aggregators comply with the directions contained in the OFO. To ensure that customers, marketers, and aggregators comply with the direction in the OFO, the Tariff imposes penalties on parties that fail to comply. The penalty for Unauthorized Deliveries is \$25 plus the Gas Daily Index price for the applicable interstate pipeline for each Mcf that the customer, marketer, or aggregator is out of balance.

7. The penalty for unauthorized deliveries is appropriately two-fold. First, there is the \$25 per Mcf charge that is designed to deter customers, marketers, or aggregators from simply relying on Empire to obtain gas on their behalf. The second charge—based on the Gas Daily Index price—ensures that Empire is made whole for the gas it is required to supply to customers that have violated the OFO or to replenish its storage facilities if it has depleted them to supply violating customers. The second charge also ensures that Empire's retail customers do not bear the burden of a marketer's non-compliance when gas prices are high, like they were during Winter Storm Uri.

² Tariff, Sheet No. 43.

8. As Winter Storm Uri was forming and forecasts were warning the Midwest and Southern U.S. to brace for its impact, Southern Star Central Gas Pipeline, Inc. (“Southern Star”) called its own OFO on February 9, 2021 at 7:13 AM. Southern Star is an interstate pipeline that delivers gas to Empire’s system on behalf of both Empire and marketers or aggregators like Symmetry Energy Solutions, LLC (“Symmetry”). On February 11, 2021 at 12:00 PM, Southern Star issued a new system-wide OFO that would commence on February 13, 2021 and have no end date. Ultimately, an OFO for Southern Star was in effect from February 11 to Gas Day February 19, 2021.

9. On the same day that Southern Star called its first OFO (February 9, 2021), Empire called its own OFO that was independent of Southern Star’s. I notified Symmetry by email of the OFO and provided the instruction to “Please adjust your nominations to ensure you are NOT SHORT. OFO Penalties will apply to unauthorized deliveries.” I also included the OFO provision from Empire’s Tariff in my email. A copy of my email is attached to Symmetry’s Complaint as **Exhibit D**.

10. When Southern Star issued a new OFO on February 11, 2021, Empire did the same and I notified Symmetry via email that a new OFO for Empire would go into effect on February 13, 2021 with instructions to “Please adjust your nominations to ensure you are NOT SHORT. OFO Penalties will apply to unauthorized deliveries.” A copy of my email is attached as **Exhibit A-2**. An OFO for Empire’s system was ultimately in effect from February 11, 2021 until Gas Day February 19, 2021.

11. Despite being on notice that Empire had called an OFO and that it needed to ensure that it nominated on a daily basis at least as much gas as its customers burned, Symmetry completely failed to comply with the OFO. As the chart attached hereto as **Exhibit A-3** shows, as

the OFO went on Symmetry nominated—with the exception of February 15—less and less gas each day.

12. Of course, Symmetry’s actions would be permissible under the Tariff if Symmetry’s customers matched the reduction in Symmetry’s nominations by reducing their gas consumption equivalently. But the opposite happened. As the chart on **Exhibit A-3** demonstrates, as the OFO continued and Symmetry nominated less gas, Symmetry’s customers actually *increased* the amount of gas they were burning.

13. Symmetry’s actions were so alarming that I repeatedly emailed them throughout the OFO period to try to better understand what it was doing and when it planned to provide the gas that its customers were burning at increasing rates. Symmetry, however, was largely unresponsive and uncooperative. For example, on the evening of February 15—a day in which Symmetry had Unauthorized Deliveries of 3,655 Mcf—I emailed Symmetry regarding 5,000 in Mcf gas cuts that were supposed to be coming in on Southern Star and asking whether those cuts would be made up. A copy of this email is attached as **Exhibit A-4**. I received no response.

14. I followed up with Symmetry again on February 16 again noting the “severe gas cuts” and that “They appear to be for Symmetry customers.” I asked Symmetry how these cuts would be resolved, but again received no response. A copy of this email is attached as **Exhibit A-5**. At this point in time gas prices on Southern Star had reached \$329 and over the President’s Day weekend, Empire’s storage reserves had started to be depleted due to Symmetry’s failure to nominate anywhere near the amount of gas that its customers had burned for the month.

15. Given these pressing issues and Symmetry’s unresponsiveness, I emailed it again on February 17 with a chart showing that other than a small nomination for one of its customers,

Symmetry had no nominations for gas days 17-18. I asked them to “confirm if this is correct?” Yet again, Symmetry did not respond. A copy of my email is included on the attached **Exhibit A-6**.

16. As of February 18, Symmetry had still not responded to my emails and Empire’s storage resources were being depleted. I thus emailed Symmetry that morning noting that

My best guess is the pool will use 20,000 MCF. Symmetry has only sent 2495 Mmbtu so far on the pool which has caused great strain on my supply. The additional missing gas on day 16-18 have also caused great strain on my supply. **Can you please communicate what Symmetry’s plan is moving forward. I need to know if I need to make other accommodations.**

(emphasis added). I asked Symmetry to “Please respond by 11:00 today.” When Symmetry finally responded, however, it merely said “It is my understanding the supply group is working diligently to resolve this issue today.” A copy of this email exchange is included on the attached **Exhibit A-6**.

17. Given that Symmetry’s response hardly provided the information necessary to know whether I would need to purchase gas to cover for it, on February 19, 2021, I again emailed Symmetry noting that “In the 2014 cold snap, the pool used 23,000. I see only 230 Mmbtu sent today for the small volume pool again. This brings the total month nomination to 2725. This is not enough gas for the pool, Symmetry needs to greatly increase the nomination for this weekend.” To this, Symmetry simply said “Thank you for your email I know our supply group is working to bring volumes up as quickly as possible.” A copy of this email exchange is included in the attached **Exhibit A-6**.

18. In short, rather than acting “cooperatively and collaboratively” as Symmetry asserts it did in its Complaint, Symmetry’s actions exacerbated the issues that caused Empire to call the OFO in the first place. Empire was forced to essentially step in to Symmetry’s shoes and procure gas on Symmetry’s behalf—at a time when gas prices went over \$600—so its customers could

continue to burn as if the area was not in the grips of Winter Storm Uri and the natural gas and electric systems were not stressed.

19. Due to Symmetry's non-compliance with Empire's OFO it incurred substantial OFO penalties, which I calculated in accordance with the Tariff's OFO penalty provision for Unauthorized Deliveries. This calculation was provided to Symmetry with the supporting Daily Natural Gas prices for the OFO time period in an August 16, 2021 email I sent. A copy of that email is attached as **Exhibit A-7**.

20. While the OFO was in effect, I was also part of a call with Kevin Headrick, the Director of Symmetry's western region. During the call I explained to him that Symmetry was sending only minor amounts of gas most days and that on February 17 and 18 (other than for one customer) Symmetry nominated no gas. We reiterated that there would be OFO penalties associated with Symmetry's failure to comply with the OFO, which he acknowledged.

21. While I understand that the OFO penalty that Symmetry has incurred appears to be significant, its actions during Winter Storm Uri—namely nominating only nominal amounts of gas while its customers did not reduce and, in many cases increased their consumption—is exactly the type of behavior that OFO penalties are designed to prevent. Additionally, given the high gas prices and the cost to Empire to cover for Symmetry, the penalties will not serve as a windfall to Empire. In fact, of the \$11,871,298.69 that Symmetry incurred for its OFO violations, only \$839,731.76 of that amount is based on the \$25 Mcf penalty.

22. I hereby swear and affirm that to the best of my knowledge and belief, the information herein is true and correct.

Tatiana Earhart

Tatiana Earhart

Subscribed and sworn to before me this 17 day of September, 2021.

ANGELA M. CLOVEN
Notary Public - Notary Seal
State of Missouri
Commissioned for Jasper County
My Commission Expires: November 06, 2023
Commission Number: 15262659

Angela M. Cloven
Notary Public

My commission expires: 11/06/2023

Exhibit A-2

From: Tatiana Earhart
Sent: Thursday, February 11, 2021 12:00 PM
To: Tatiana Earhart <Tatiana.Earhart@libertyutilities.com>
Cc: Deborah Gilbertson <Deborah.Gilbertson@libertyutilities.com>
Subject: FW: Critical, Operational Flow Order,20210213, Southern Star, 007906233

All,

Please be advised Southern Star has issued a new System Wide OFO effective the start of gas day **Saturday, February 13, 2021 until no end date**.

Empire will do the same.

Please adjust your nominations to ensure you are NOT SHORT. OFO Penalties will apply to unauthorized deliveries.

Tatiana

From: csinotices@southernstar.com <csinotices@southernstar.com>
Sent: Thursday, February 11, 2021 11:44 AM
Subject: Critical, Operational Flow Order,20210213, Southern Star, 007906233

TSP Name: Southern Star Central Gas Pipeline, Inc.
TSP: 007906233
Notice ID: 9686
Critical: Y
Notice Type: Operational Flow Order
Notice Stat Desc: Initiate
Notice Eff Date / Time: 2/13/2021 9:00 AM
Notice End Date / Time: 12/31/9999 11:59 PM
Reqrd Rsp Desc: No response required.
Post Date / Time: 2/11/2021 11:35 AM
Subject: Delivery Location Operational Flow Order (OFO) – System Wide -- ALL Line Segments

Notice Text

Southern Star Central Gas Pipeline (“SSCGP”) is issuing a Standard OFO applicable to Receiving Parties taking deliveries on ALL Line Segments, pursuant to Section 10 of its FERC Gas Tariff’s General Terms and Conditions (“GT&C”), due to point operators taking more gas off the system than is scheduled, and considering any no-notice Maximum Daily Quantity (“MDQ”) at the location, during the current below normal temperatures and

high demands. This order will be effective at 9:00 A.M. CST on February 13, 2021. Requirements of this OFO are listed below.

Requirements of this Standard OFO

On a daily basis:

1. Takes at any delivery point on ALL Line Segments shall not exceed the sum of the quantity scheduled by Southern Star and confirmed by the Receiving Party for the account of all Shippers delivering gas at that point, plus the remaining MDQ(s) for that Delivery Point under Rate Schedules TSS and STS. Receiving Parties who take gas in excess of that amount at any delivery point will be subject to penalties pursuant to GT&C Section 10 for failure to comply with this OFO.

This OFO will remain in effect at least through the February 16, 2021 gas day; however, SSCGP will monitor operations and may, by additional notice, either adjust this Standard OFO to an Emergency OFO, extend it beyond such date or terminate it earlier as operational conditions warrant. Thank you in advance for your cooperation in this matter. If you have any questions regarding this notice, please contact one of the Customer Service Representatives listed below.

Scott Warren	Office: (270) 852-4559	Cell: (270) 302-6433
Chris Williams	Office: (270) 852-4544	Cell: (270) 302-1143
Buster Ashley	Office: (270) 852-4546	Cell: (270) 314-1436
Will Wathen	Office: (270) 852-4483	Cell: (270) 925-1969
Robin Joska	Office: (270) 852-4565	Cell: (270) 302-5007
Scheduling	Office: (855) 730-2926	

Exhibit A-3

Symmetry Daily Imbalances - OFO Period 11-18

Date	Customer Usage per Mcf	Nominations per Mcf	Daily Imbalance per Mcf
2/11/2021	9759	7903	-1856
2/12/2021	8227	7169	-1058
2/13/2021	7379	4659	-2720
2/14/2021	6997	3588	-3409
2/15/2021	8809	5154	-3655
2/16/2021	9023	1613	-7410
2/17/2021	8789	548	-8241
2/18/2021	7794	548	-7246

Exhibit A-4

From: Tatiana Earhart <Tatiana.Earhart@libertyutilities.com>
Sent: Monday, February 15, 2021 6:32 PM
To: Keen, Michael (michael.keen@symmetryenergy.com); Wolf, Mark (mark.wolf@symmetryenergy.com)
Cc: Deborah Gilbertson
Subject: gas cuts

Good evening,

I'm seeing a total of 5,000 in gas cuts on Southern Star for gas day 15 ID2. The cuts are impacting 16 customers from what I can see.

Can you tell me if those cuts are being made whole for ID3?

Tatiana

Exhibit A-5

From: Tatiana Earhart <Tatiana.Earhart@libertyutilities.com>
Sent: Tuesday, February 16, 2021 1:35 PM
To: Wolf, Mark (mark.wolf@symmetryenergy.com); Keen, Michael (michael.keen@symmetryenergy.com)
Cc: Deborah Gilbertson
Subject: gas cuts
Importance: High

Michael/Mark,

I'm seeing severe gas cuts for GD16 ID1.

They appear to be for Symmetry customers. Are these cuts getting cleared up?

	B	C	D	E	F	G	H
Contract	Begin Date	End Date	Cycle	Downstre	Downstre	Downstream Package ID	
6 RA-30487	2/16/2021	2/17/2021	ID1	13214			
6 RA-30487	2/16/2021	2/17/2021	ID1	13218			
6 RA-30487	2/16/2021	2/17/2021	ID1	13219			
6 RA-30487	2/16/2021	2/17/2021	ID1	13202			
6 RA-30487	2/16/2021	2/17/2021	ID1	13222			
6 RA-30487	2/16/2021	2/17/2021	ID1	13679			
6 RA-30381	2/16/2021	2/17/2021	ID1	13212			
6 RA-30487	2/16/2021	2/17/2021	ID1	13193			
6 RA-30487	2/16/2021	2/17/2021	ID1	13212			
6 RA-30487	2/16/2021	2/17/2021	ID1	13300			
6 RA-30487	2/16/2021	2/17/2021	ID1	13303			
6 RA-30487	2/16/2021	2/17/2021	ID1	13303			
6 RA-30487	2/16/2021	2/17/2021	ID1	13303			
6 RA-30487	2/16/2021	2/17/2021	ID1	13204			
6 RA-30487	2/16/2021	2/17/2021	ID1	13230			
6 RA-30487	2/16/2021	2/17/2021	ID1	13742			

Tatiana

Exhibit A-6

From: Wolf, Mark <mark.wolf@symmetryenergy.com>
Sent: Friday, February 19, 2021 8:03 AM
To: Tatiana Earhart; Pemberton, Rick; Keen, Michael
Cc: Deborah Gilbertson; Purcell, Shon; Headrick, Kevin
Subject: RE: SSCGP Gas Supply

Tatiana,

Thank you for your email I know our supply group is working to bring volumes up as quickly as possible.

Regards,

Mark

From: Tatiana Earhart
Sent: Friday, February 19, 2021 6:58 AM
To: Wolf, Mark ; Pemberton, Rick ; Keen, Michael
Cc: Deborah Gilbertson ; Purcell, Shon ; Headrick, Kevin
Subject: RE: SSCGP Gas Supply

CAUTION: This email originated from an external sender. Be careful when clicking on links or opening any attachments.

Mark,

I see in the system Symmetry has gas scheduled for 2/19. The Southern Star small volume pool historically uses upwards toward 20,000. In the 2014 cold snap, the pool used 23,000. I see only 230 Mmbtu sent today for the small volume pool again. This brings the total month nomination to 2725. This is not enough gas for the pool, Symmetry needs to greatly increase the nomination for the weekend.

01/01/2014 1000 CST	SEM SSCGP SV	23,659	MCF
02/01/2014 1000 CST	SEM SSCGP SV	19,928	MCF
01/01/2015 1000 CST	CTM SSCGP SV	18,750	MCF
02/01/2015 1000 CST	CTM SSCGP SV	18,976	MCF
01/01/2016 1000 CST	CTM SSCP MKTZNE SV	18,622	MCF
02/01/2016 1000 CST	CTM SSCP MKTZNE SV	12,685	MCF
01/01/2017 1000 CST	SEM SSCP MKTZNE SV	15,391	MCF
02/01/2017 1000 CST	SEM SSCP MKTZNE SV	9,818	MCF
01/01/2018 1000 CST	SEM SSCP MKTZNE SV	20,929	MCF
02/01/2018 1000 CST	SEM SSCP MKTZNE SV	15,408	MCF
01/01/2019 1000 CST	SEM SSCP MKTZNE SV	17,243	MCF
02/01/2019 1000 CST	SEM SSCP MKTZNE SV	17,903	MCF
01/01/2020 1000 CST	SEM SSCP MKTZNE SV	16,863	MCF
02/01/2020 1000 CST	SEM SSCP MKTZNE SV	14,729	MCF

Tatiana

Tatiana Earhart | Liberty Utilities (Missouri) | Gas Transportation Supervisor
P: 417-625-4245 | C: 417-438-2307 | E: Tatiana.Earhart@libertyutilities.com

From: Wolf, Mark <mark.wolf@symmetryenergy.com>
Sent: Thursday, February 18, 2021 8:08 AM
To: Tatiana Earhart <Tatiana.Earhart@libertyutilities.com>; Pemberton, Rick <rick.pemberton@symmetryenergy.com>; Keen, Michael <michael.keen@symmetryenergy.com>
Cc: Deborah Gilbertson <Deborah.Gilbertson@libertyutilities.com>; Purcell, Shon <shon.purcell@symmetryenergy.com>; Headrick, Kevin <kevin.headrick@symmetryenergy.com>
Subject: RE: SSCGP Gas Supply

It is my understanding the supply group is working diligently to resolve this issue today.

From: Tatiana Earhart <Tatiana.Earhart@libertyutilities.com>
Sent: Thursday, February 18, 2021 8:05 AM
To: Wolf, Mark <mark.wolf@symmetryenergy.com>; Pemberton, Rick <rick.pemberton@symmetryenergy.com>; Keen, Michael <michael.keen@symmetryenergy.com>
Cc: Deborah Gilbertson <Deborah.Gilbertson@libertyutilities.com>
Subject: RE: SSCGP Gas Supply
Importance: High

CAUTION: This email originated from an external sender. Be careful when clicking on links or opening any attachments.

Mark,

I'm following up on the email below. I reviewed the Symmetry Southern Star small volume pool nominations as well. Historically, the pool has used 16,000 MCF. There are a few new customers to the pool, one with larger volumes. My best guess is the pool will use 20,000 MCF. Symmetry has only sent 2495 Mmbtu so far on the pool which has caused great strain on my supply. The additional missing gas on day 16-18 have also caused great strain on my supply. Can you please communicate what Symmetry's plan is moving forward. I need to know if I need to make other accommodations.

Please respond by 11:00 today.

A	B	C	D	E	F	G
	Consumption		Nomination			
Day	Mcf Burnertip	Mcf City Gate	Mmbtu City Gate	Mcf City Gate	BTU	Mcf City Gate
01-Feb-2021	0	0	130	124.46	1044.5	0
02-Feb-2021	0	0	130	124.39	1045.1	0
03-Feb-2021	0	0	130	124.14	1047.2	0
04-Feb-2021	0	0	130	124.56	1043.7	0
05-Feb-2021	0	0	130	126.79	1025.3	0
06-Feb-2021	0	0	130	127.68	1018.2	0
07-Feb-2021	0	0	130	127.73	1017.8	0
08-Feb-2021	0	0	130	127.64	1018.5	0
09-Feb-2021	0	0	130	127.03	1023.4	0
10-Feb-2021	0	0	230	219.32	1048.7	0
11-Feb-2021	0	0	230	218.9	1050.7	0
12-Feb-2021	0	0	230	219.13	1049.6	0
13-Feb-2021	0	0	230	219.93	1045.8	0
14-Feb-2021	0	0	230	220.16	1044.7	0
15-Feb-2021	0	0	148	143.66	1030.2	0
16-Feb-2021	0	0	27	25.66	1052.4	0
17-Feb-2021	0	0	0	0	1052.4	0
18-Feb-2021	0	0	0	0	994.6	0
19-Feb-2021	0	0	0	0	994.6	0
20-Feb-2021	0	0	0	0	994.6	0
21-Feb-2021	0	0	0	0	994.6	0
22-Feb-2021	0	0	0	0	994.6	0
23-Feb-2021	0	0	0	0	994.6	0
24-Feb-2021	0	0	0	0	994.6	0
25-Feb-2021	0	0	0	0	994.6	0
26-Feb-2021	0	0	0	0	994.6	0
27-Feb-2021	0	0	0	0	994.6	0
28-Feb-2021	0	0	0	0	994.6	0
Totals	0	0	2495	2401.18		0

Tatiana

Tatiana Earhart | Liberty Utilities (Missouri) | Gas Transportation Supervisor

P: 417-625-4245 | C: 417-438-2307 | E: Tatiana.Earhart@libertyutilities.com

602 S Joplin Ave, Joplin, MO 64801

From: Tatiana Earhart

Sent: Wednesday, February 17, 2021 6:21 PM

To: Wolf, Mark (mark.wolf@symmetryenergy.com) <mark.wolf@symmetryenergy.com>; Pemberton, Rick <rick.pemberton@symmetryenergy.com>; Keen, Michael (michael.keen@symmetryenergy.com) <michael.keen@symmetryenergy.com>

Cc: Deborah Gilbertson <Deborah.Gilbertson@libertyutilities.com>

Subject: SSCGP Gas Supply

Importance: High

Mark,

I'm reviewing Transportation customer nominations for Southern Star and I see one nomination for [REDACTED] for gas days 17-18. The remaining transportation customers show zero. Can you confirm if this is correct?

Pipeline	Entity	Nom Location	Svc Requester	SR Contract	Downstream Cp	Downstream Package ID
SSC	EDG	MARSHALL	CES INC	RB30055	13197	[REDACTED]
SSC	EDG	W-MCCORMICK	CES INC	RA30487	13742	[REDACTED]
SSC	EDG	W-MCCORMICK	CES INC	RA30381	13742	[REDACTED]
SSC	EDG	W-MCCORMICK	CES INC	RB30055	13742	[REDACTED]
SSC	EDG	NEVADA	CES INC	RA30487	13679	[REDACTED]
SSC	EDG	NEVADA	CES INC	RB30055	13679	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30487	13204	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RB30055	13204	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30487	13300	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30381	13300	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RB30055	13300	[REDACTED]
SSC	EDG	NEVADA	CES INC	RA30487	13222	[REDACTED]
SSC	EDG	NEVADA	CES INC	RB30055	13222	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30487	13212	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30381	13212	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RB30055	13212	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30487	13230	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RB30055	13230	[REDACTED]
SSC	EDG	CLINTON	CES INC	RA30487	13214	[REDACTED]
SSC	EDG	CLINTON	CES INC	RB30055	13214	[REDACTED]
SSC	EDG	CLINTON	CES INC	RA30487	13218	[REDACTED]
SSC	EDG	CLINTON	CES INC	RA30487	13219	[REDACTED]
SSC	EDG	CLINTON	CES INC	RB30055	13218	[REDACTED]
SSC	EDG	CLINTON	CES INC	RB30055	13219	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30487	13303	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RB30055	13303	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30487	13303	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RB30055	13303	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30487	13303	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RB30055	13303	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RA30487	13616	[REDACTED]
SSC	EDG	SEDALIA	CES INC	RB30055	13616	[REDACTED]

Tatiana

Exhibit A-7

From: Tatiana Earhart <Tatiana.Earhart@libertyutilities.com>

Sent: Monday, August 16, 2021 4:40 PM

To: doug@healylawoffices.com; stacy.williams@symmetryenergy.com; brian.harrison@symmetryenergy.com

Cc: Mike Beatty <Mike.Beatty@libertyutilities.com>; Sarah Knowlton <Sarah.Knowlton@libertyutilities.com>; Diana Carter <Diana.Carter@libertyutilities.com>; Whittle, Elizabeth <EWhittle@nixonpeabody.com>

Subject: Storm Uri Costs

[EXTERNAL E-MAIL]

Good afternoon,

In follow up to our recent meeting regarding amounts owed by Symmetry to Empire District Gas for supply provided to your customers during Storm Uri, you asked for invoices showing gas purchases. Section O(2)(a) of EDG's tariff states that "Customer, Aggregator, or Marketer shall be charged a penalty of \$25.00 per Mcf, plus the Gas Daily Index price for the applicable Interstate Pipeline for such Unauthorized Overruns during the duration of the OFO."

The following chart shows the amount of Symmetry's daily imbalances for February 11-18 when the OFO was in effect.

Symmetry Daily Imbalances - OFO Period 11-18			
2/11/2021	9759	7903	-1856
2/12/2021	8227	7169	-1058
2/13/2021	7379	4659	-2720
2/14/2021	6997	3588	-3409
2/15/2021	8809	5154	-3655
2/16/2021	9023	1613	-7410
2/17/2021	8789	548	-8241
2/18/2021	7794	548	-7246

I'm attaching screenshots from Platts showing the Gas Daily Index price for the Southern Star pipeline for February 11-18, as well as redacted invoices of our purchases showing volumes and the price for each day (we checked our NAESB and we are not permitted to release the full unredacted invoices to you).

Applying the Gas Daily Index Price for these days, plus the penalty of \$25.00 per Mcf, Symmetry owes the following.

	Penalty \$25	GDD Price	Total
Southern Star Large Volume	\$627,183.03	\$8,708,060.92	\$9,335,243.95
Southern Star Small Volume Pool	\$206,927.50	\$2,287,248.11	\$2,494,175.61
Panhandle Large Volume	\$5,621.24	\$36,257.90	\$41,879.13
Total	\$839,731.76	\$1,031,566.92	\$11,871,298.69

To date, we have received no payment from Symmetry, and again request that you immediately make payment of the outstanding amount but in any event no later than August 31, 2021. In the event that we do not receive payment by then, we will provide notice that EDG is terminating Symmetry's participation on EDG's system.

Tatiana

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