Docket No:_A.13-12-012 / I.14-06-016
Exhibit: $\qquad$
Date: August 11, 2014

Witness: Anthony Cusati, III

TESTIMONY OF ANTHONY CUSATI, III ON BEHALF OF THE CORE TRANSPORT AGENT CONSORTIUM IN PACIFIC GAS \& ELECTRIC'S GAS TRANSMISSION AND STORAGE RATE CASE AND CONSOLIDATED ORDER INSTITUTING INVESTIGATION

## Q: Please state your name, title and business address.

A: My name is Anthony Cusati, III. I am the Director of Regulatory Affairs for Interstate Gas Supply, Inc. dba IGS Energy ("IGS"). My business address is 1379 Butter Churn Drive, Herndon, Virginia 20170. My professional and educational qualifications are provided in Attachment 1.

## Q: Please describe IGS

A: IGS serves over 1 million customers nationwide and sells natural gas and electricity to customers in 11 states and in over 40 utility service territories. The IGS family of companies (which include IGS Generation, IGS Home Services and IGS CNG Services) also provides customers focused energy solutions that complement IGS Energy's core commodity business including distributed generation, CNG refueling, and utility line protection. .Currently our operations in California are focused on supplying natural gas to the residential consumer.

Q: Have you previously testified before the California Public Utilities Commission?

A: No I have not previously testified before the California Public Utilities Commission, however, I have provided testimony in regulatory proceedings in New York, Pennsylvania, Maryland, Texas and Illinois.

Q: On whose behalf are you testifying?
A: I am testifying on behalf of the Core Transport Agent Consortium ("CTAC"). CTAC is an ad-hoc coalition representing a significant portion of core transport agent ("CTA") service in northern California. IGS is as member of CTAC.

Q: What is the purpose of your testimony?

A: This testimony presents information as to issues that IGS currently experiences with PG\&E's consolidated billing practices and protocols.

## Q: What is consolidated billing?

A: Consolidated Billing is on optional service provided by PG\&E whereby a CTA provides PG\&E either the amount to charge the CTA customers or a rate on a per therm basis, for natural gas service that PG\&E uses to calculate the CTA charges. PG\&E then bills the CTA's customer on behalf of the CTA, collects charges for the CTA-provided gas on behalf of the CTA, and electronically transmits that payment to the CTA.

## Q: Does IGS utilize PG\&E consolidated billing.

A: Yes. IGS utilizes consolidated billing for its residential customers in PG\&E's service territory.
Q. Does IGS pay PGE for the utility consolidated billing service?
A. Yes. IGS pays PGE for the utility consolidated billing service of 70 cents per invoice. Further, in order to initiate utility consolidated billing IGS was required to pay PGE substantial set-up fees and we are required to pay on-going maintenance fees. Thus the payments that IGS makes to PGE for the utility consolidated billing service are significant.

## Q. Do CTA customers pay for utility billing services?

A. Yes. CTA customers pay distribution rates and the cost of utility billing is recovered through distribution rates. Bundled customers cost of billing for the natural gas commodity are recovered through distribution rates as well so it would be reasonable to expect that CTA customers would get the same level of service for billing that is afforded to bundled customers.

## Q. Why is utility consolidated billing important?

A. Utility consolidated billing is important in order for residential customers to have a positive customer experience when receiving natural gas service from a CTA. Residential gas customers generally prefer to receive one bill from the utility for distribution and commodity service. When the customer leaves PGE in order to receive commodity gas service from a CTA the CTA could either bill the customer separately for commodity, but that would mean the customer would receive two bills for their natural gas service. The other option is for the CTA to utilize utility consolidated billing which enables the customer to continue to receive one bill for distribution and commodity service. Currently under the California regulatory structure CTAs do not have the ability to bill for the utility distribution charges, so CTA's cannot maintain that one bill experience for the customer without utilizing utility consolidated billing.

## Q: Has IGS experienced any issues with the timely remittance of payments from PG\&E?

A: Yes. It is has been IGS' experience that PG\&E does not consistently release customer payments to IGS in a timely manner.

## Q: Do you know of circumstances that might lead PG\&E not to make timely payments to IGS?

A: Yes. It is my understanding that if there is a credit or refund provided on a customer bill, which has no relationship with the commodity charge of IGS, a portion of such credit is applied to the IGS commodity charge, thus reducing the amount remitted and owed to IGS in this circumstance. Moreover, if an IGS customer is under-billed, PG\&E may take funds paid by the customer for IGS' balance and apply such funds to other PG\&E
charges on the bill such as transmission and distribution charges. Also, if a customer is put on a negotiated payment plan it is my understanding that PG\&E will apply all funds paid by the customer on such payment plan to PG\&E charges first before remitting any payment to IGS.

Q: Does PG\&E inform IGS of the reasons why PG\&E has not remitted payments made by IGS' customers?

A: No. PG\&E does not inform IGS of the fact that it has received payment from an IGS customer but has not remitted such payment to IGS, nor does PG\&E provide IGS with any reasons why such payment has not been remitted to IGS. PGE also does not provide any accounting as to how much the customer owes IGS or where IGS' payments stand in line with the other customer payments that are past due.

Q: How does IGS learn of the fact that its customers have paid PG\&E for IGS charges but PG\&E has failed to remit such payment to IGS?

A: Often times, IGS learns of the fact that its customers have already paid an outstanding bill only after it has taken action against the customer based upon non-payment. Where the customer has actually paid PG\&E for the IGS portion of the bill, but PG\&E has failed to remit such payment, the customer will often contact IGS and inform IGS that the customer has already made the subject payment to PG\&E.

## Q: What are the consequences of PG\&E's practices you have described.

A: PG\&E's failure to consistently remit timely customer payments to IGS results in uncertainty as whether there is an error in PG\&E's or IGS' billing system, or whether IGS' customer has simply failed to make a payment. If IGS has not been paid, and PG\&E will not inform IGS as to the reasons why it has not been paid, IGS is often left
with no choice but to inform the customer that no payment has been received, and if such non-payment continues to return the customer to PG\&E commodity service and seek to collect the outstanding debt owed to IGS independently of PGE's billing and credit and collection process. In circumstances where the IGS customer has paid, but PG\&E has not timely remitted such payment to IGS, or informed IGS as to why it has not remitted such payment, the result is customer frustration. This process makes for an unpleasant customer experience, creates an adversarial relationship with the customer, adds additional resource time which drives up costs, which are passed onto the consumer in the form of higher prices.

Q: Can you provide any examples of some of the circumstances you have described.
A: Yes. Attachments 2 and 3 contain screen shots of customer account information from IGS' accounting and billing system that are representative examples of the problems I have described above regarding PG\&E's failure to timely remit payment to IGS. The screen shots in Attachment 2 show examples of accounts for which charges were billed but IGS did not receive timely payment from PG\&E. Call notes for these accounts indicate that IGS was provided notice from the customer that payment had been made to PG\&E. The screen shots in Attachment 3 show examples of customer accounts for which PG\&E and the customer had negotiated a payment plan, but IGS was not informed of such payment plan.
Q. Has IGS attempted to get more information from PGE regarding the customer payment issues?
A. Yes. IGS representatives have had informal conversations with PGE representatives regarding the difficulty we are having from PGE regarding receiving customer payment
information. PGE generally cites customer privacy issues regarding why they provide virtually zero information to IGS about the payments made by customers. However, the customer has affirmatively agreed to enroll in commodity service from IGS, and has agreed to terms and conditions of service that authorize IGS to act as their agent and work with PG\&E in procuring natural gas supply. Therefore, PGE should provide IGS with the basic customer payment information IGS needs to effectuate the service upon which the customer has enrolled. Generally, this is not controversial. In other jurisdictions with natural gas Choice programs I am unaware of any market where the utility will not provide basic payment information to the Choice supplier such as the amount of money the customer owes to the Choice supplier. IGS participates in dozens of natural gas Choice markets throughout the country.
Q. Do you have any recommendation as to how PGE should correct the problems you detail in your testimony?
A. I am in agreement with the recommendations regarding these issues set forth in CTAC Witness Mark Fulmer's prepared testimony in this proceeding.
Q. Will adopting the recommendations listed above significantly improve the experience for a customer when the customer is past due on the utility bill?
A. Being past due on a utility bill is likely already a stressful experience for the customer. Thus anything that can be done to ensure that the collections process can go as smoothly and accurately as possible will significantly improve the experience for the customer that is already likely experiencing difficulty. Conversely, when the correct billing data is not provided to CTA, creating uncertainty in the amount that the customer owes, it can significantly exacerbate the customer's difficulties.

1 Q: Does this conclude your testimony?
2 A. Yes.
3

## ATTACHMENT 1

## Qualifications of Anthony Cusati, III

I attended Roger Williams College in Bristol, Rhode Island and studied Business Administration with a major in Accounting. I have been employed by Interstate Gas Supply, Inc. since January, 2008 as the Director of Regulatory Affairs, and in that capacity I am responsible for regulatory affairs matters in markets that IGS Energy operates, which includes existing markets as well as new market development. Prior to this, I was employed by two competitive energy supply companies, Commerce Energy, Inc. and ACN Energy, Inc. in similar capacities from 2000 through the end of 2007. Prior to my employment in the competitive energy supply arena, I was employed in the for-profit sector of healthcare, holding various financial management positions ranging from Controller to Chief Financial Officer. In summary, I have considerable experience in many states covering customer CHOICE issues.

## Attachment 2

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|  |  | 3/24/2014 | 4/23/2014 | $\begin{aligned} & 2 / 2 / 2014- \\ & 3 / 22 / 2014 \end{aligned}$ | \$494.95 | \$356, 18 | \$2227 | \$191.84 |
|  | Payment |  |  | $36 / 2014$ |  | \$356.15 |  | \$128.77 |
|  |  | 2/2012044 | 3/13/20\% | $\begin{aligned} & 1 / 222014- \\ & 2 / 21 / 2014 \end{aligned}$ | \$ $\$ 365.15$ | \$0.00 | \$128.77 | \$494,98 |
|  | Lstay fee | 27/2014 | 1/13/2014 | $\begin{aligned} & 11 / 201013- \\ & 12 / 202013 \end{aligned}$ | \$369.7\% | \$2.00 | (62.61) | \$206.48 |
|  |  | 1/2/2014 | 221,2014 | $\begin{aligned} & 12 / 20 / 2013 \\ & 1 / 2 / 2014 \end{aligned}$ | \$184.14 | \$1009 | +1885.68 | \$368.79 |
|  | Lutaree | 1/12/2044 | 1/2/2014 | $\begin{aligned} & 11202013- \\ & 12 / 2012013 \end{aligned}$ | \$180.50 | \$000 | 43, 61 | \$204.14 |
|  |  | 12/20/2013 | 192014 | $11 / 202013 \text { - }$ | \$0.00 | \$0.00 | \$180,50 | \$180.50 |


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| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| AR Summary $E$ En $D_{131 / 2013-7 / 31 / 2014}$ |  |  |  |  |  |  |  |  |
| Invoice $\boldsymbol{*}$ | Type | Invoice Date | Due Date | Service Period | $\begin{aligned} & \text { Prev. } \\ & \text { Balance } \end{aligned}$ | Payments + Adjustments | Invace Amount | Amount Due |
|  |  |  |  | 71772014 |  | \$23.59 |  | \$38.50 |
|  |  | 6/30/2014 | 7/30/2014 | $\begin{aligned} & 5 / 22 / 2014- \\ & 6 / 21 / 2014 \end{aligned}$ | \$75.55 | \$29.77 | \$16.31 | \$62,09 |
|  | Payment |  |  | 6/4/2014 |  | \$29.77 |  | \$45.78 |
|  |  | 5/30/2014 | 6/29/2014 | $\begin{aligned} & \text { 4/23/2014 - } \\ & 5 / 22 / 2014 \end{aligned}$ | \$104.01 | \$46.20 | \$17.74 | \$75.55 |
|  | Payment |  |  | 5/5/2014 |  | \$46,20 |  | \$57.81 |
|  |  | 4/30/2014 | 5/30/2014 | $\begin{aligned} & 3 / 22 / 2014- \\ & 4 / 23 / 2014 \end{aligned}$ | \$108.24 | \$27,68 | \$23.45 | \$104.01 |
|  | Payment |  |  | 4/3/2014 |  | \$27.68 |  | \$80.56 |
|  |  | 3/31/2014 | 4/30/2014 | $\begin{gathered} 2 / 21 / 2014 \\ 3 / 22 / 2014 \end{gathered}$ | \$99.85 | \$20.19 | \$28.58 | \$108,24 |
|  | Payment |  |  | 3/5/2014 |  | \$20,19 |  | \$79.66 |
|  |  | 2/27/2014 | 3/19/2014 | $\begin{aligned} & 1 / 22 / 2014 . \\ & 2 / 21 / 2014 \end{aligned}$ | \$52.78 | \$0.00 | \$47.07 | \$99.85 |
|  |  | 1/29/2014 | 2/28/2014 | $\begin{aligned} & 12 / 20 / 2013- \\ & 1 / 22 / 2014 \end{aligned}$ | \$0,00 | \$0.00 | \$52.78 | \$52.78 |



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| Invoice $=$ | Tyse | $\begin{aligned} & \text { Invice } \\ & \text { Date } \end{aligned}$ | Due Date | Sevice fercod | Prev: Balance | Pavnents + Adjustments | Invere Anount | Anount <br> Due |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Payment |  |  | 4/30/2024 |  | \$669,95 |  | \$0.10 |
|  | Payment |  |  | 3/2712014 |  | \$455.39 |  | \$69.95 |
|  |  | 1/27/2014 | 2/26/2014 | $\begin{gathered} 12 / 25 / 2013- \\ 1 / 252014 \end{gathered}$ | \$50.47 | 50.00 | \$54.76 | \$115.25 |
|  |  | 1272612013 | 1/15/2014 | $\begin{aligned} & 11 / 23 / 2013-125 / 2013 \\ & 12 / 25 \end{aligned}$ | \$0,00 | \$0,00 | \$60.47 | \$50,47 |



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|  |  | 41/2014 | 5/12044 | 3/12014-41/2014 | \$275.57 | 50.00 | \$50.58 | \$226.15 |
|  |  | 3122014 | 3/22/2014 | 123012014-3112014 | \$21600 | \$0.00 | 559.57 | \$275.57 |
|  | Late Fee | 2772014 | 1/22/2014 | $\begin{aligned} & 11 / 27 / 2013 \text { - } \\ & 12 / 29 / 2013 \end{aligned}$ | 221032 | \$0,00 | [ 92.314 | +216.00 |
|  |  | 133012014 | 3/12014 | 12/29/2013 - <br> 1/30/2014 | \$118,00 | \$0.00 | \$100.31 | \$218.31 |
|  | $\begin{aligned} & \text { Lute } \\ & \text { fee } \end{aligned}$ | 1/22/2014 | 1/22/2014 | $\begin{aligned} & 11 / 27 / 2013 \\ & 12 / 29 / 200 \end{aligned}$ | \$115.69 | 50.00 | 42.3\% | \$118,00 |
|  |  | 12/29/2003 | 1/18/2014 | 11/27/2013. <br> $12 / 29 / 2013$ | \$0,00 | 80,00 | \$115,69 | \$115.69 |



## Attachment 3

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|  |  | 7/23/2014 | 82771044 | 6/26/2014- <br> 7/26/2014 | \$1177.52 | \$0.00 | \$24,32 | \$ 14.1 . ${ }^{\text {a }}$ |
|  |  | 3/26/2004 | 7/26/2014 | 5/2a/2014 - <br> 6/25/2014 | \$77,26 | \$000 | \$40.26 | \$117.52 |
|  |  | 5/28/2014 | 6/27/2014 | $\begin{aligned} & 4 / 26 / 2014 \\ & 5 / 28 / 2014 \end{aligned}$ | \$39.50 | \$0,00 | \$77.36 | \$77,26 |
|  |  | 42712014 | 52772014 | $\begin{aligned} & 3 / 27 / 2014- \\ & 4 / 26 / 2014 \end{aligned}$ | \$0.00 | \$0.00 | \$39,90 | \$33.90 |

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|  | Fayment |  |  | 5/23/2014 |  | \$78.44 |  | \$149.17 |
|  | Payment |  |  | 5/27/2014 |  | \$100.00 |  | \$27.61 |
|  | Payment |  |  | 5/122014 |  | \$19.54 |  | \$,327.61 |
|  |  | 3/6,2014 | 5/512014 | $\begin{aligned} & 4 / 4 / 2014 \\ & 5 / 6 / 2014 \end{aligned}$ | \$316.04 | \$0,00 | \$31:14 | \$347.15 |
|  |  | 4,4/014 | 5/42014 | $\begin{aligned} & 3 / 6 / 2014 \\ & 4 / 4 / 2014 \end{aligned}$ | \$279.77 | \$0,00 | \$36.27 | \$316.04 |
|  |  | 3/512014 | 4/92014 | $\begin{aligned} & 2 / 3 / 2014 \\ & 3 / 6 / 2014 \end{aligned}$ | \$236.91 | \$11.51 | \$54.37 | \$279,77 |
|  | Payment |  |  | 4/28/2014 |  | \$11.51 |  | \$225,40 |
|  | Latefee | 2772014 | 1/27/2014 | $\begin{aligned} & 12 / 4 / 2013- \\ & 1 / 3 / 2014 \end{aligned}$ | \$239,45 | \$0.00 | (\$9.54) | \$236.91 |
|  |  | 2442014 | 3/6/2014 | 1/3/2014 <br> 2/3/2014 | \$129.47 | \$0.00 | \$109.98 | \$239.45 |
|  | Late Fem | 1/27/2014 | 1/27/2014 | $\begin{aligned} & 12 / 4 / 2013 \\ & 1 / 3 / 2014 \end{aligned}$ | \$446,69 | \$19.76 | \$2.54 | \$129.47 |
|  | Paymert |  |  | 17102014 |  | \$19.76 |  | \$126.93 |
|  |  | 2/32014 | 1/23/2014 | 12/42013. 1/3/2014 | \$0.00 | \$0,00 | \$146.69 | \$146.69 |

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| Invoce : | Type | Invice Date | Due Dite | Serva Period | $\begin{aligned} & \text { Prev, } \\ & \text { Balance } \end{aligned}$ | Payments Adjustrents | Invoice Amourt | Arount Oue |
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|  | Payment |  |  | 7/24/2014 |  | \%65. 97 |  | 90.00 |
|  | Payment |  |  | $5 / 1212014$ |  | \$57,71 |  | \$65.19 |
|  | Payment |  |  | 5/2012014 |  | \$170.00 |  | \$122, 9 |
|  | Payment |  |  | 5/22014 |  | \$44,68 |  | \$292.90 |
|  | Payment |  |  | 5/2/2014 |  | \$14.32 |  | \$37758 |
|  | Payment |  |  | 5/22014 |  | \$3.12 |  | \$351.90 |
|  | Peyment |  |  | 5/212014 |  | \$45.00 |  | \$355.02 |
|  | Payment |  |  | 5/22014 |  | \$45.00 |  | \$400.02 |
|  |  | 4/32014 | 5/32004 | 35/2014-4/312014 | 4 4332.23 | \$29,48 | \$36.37 | \$445:02 |
|  | Payment |  |  | 4112014 |  | \$24.48 |  | \$468.65 |
|  |  | 3/5/2014 | 3/25/2014 | 2112014-31512014 | \$352.73 | \$0.00 | \$80,40 | \$493,13 |
|  | Late Fee | 2772014 | 1/26/2014 | $\begin{aligned} & 12 / 3 / 2013 \\ & 1 / 1 / 2014 \end{aligned}$ | \$355.74 | \$0,00 | (\$2,98) | \$352.73 |
|  |  | 272004 | 3/4/2014 | 1/1/2014-21/2014 | \$233,93 | \$0.00 | \$121.78 | \$355.71 |
|  | Late Fer | 1/26/2014 | 1/26/2014 | 12/3/2013. <br> 1/1/2014 | \$23095 | \$0.00 | \$2.88 | \$233.93 |
|  | Lake fee | 1/92014 | 12/27/2093 | $\begin{aligned} & 10 / 31 / 2013- \\ & 12 / 2 / 2013 \end{aligned}$ | \$232.59 | \$0.00 | (\$*.54) | \$230,95 |
|  |  | 1/22014 | 1/22/2014 | $\begin{aligned} & 12 / 32013 \\ & 1 / 12014 \end{aligned}$ | \$83.61 | \$0,00 | \$148.98 | 5232.59 |
|  | Late Fee | 1227/2013 | 12/27/2013 | $\begin{aligned} & 10 / 312013 \text {. } \\ & 12 / 2012 \end{aligned}$ | \$31.97 | \$0,00 | \$1.64 | \$83.61 |
|  |  | 123/2013 | 22/23/2013 | 10/31/2013. <br> 12/22015 | \$0.00 | \% 00.00 | \$81,97 | \$814.97 |

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|  |  | 4/15/2014 | 5/15/2014 | $\begin{aligned} & 3 / 5 / 2014 \\ & 4 / 3 / 2014 \end{aligned}$ | \$300,54 | \$0.00 | \$ $\$ 0.92$ | \$351.46 |
|  |  | 3/5:2014 | 3/25/2014 | $\begin{aligned} & \text { 211/2014- } \\ & 3 / 5 / 2014 \end{aligned}$ | \$211.49 | \$000 | \$99.05 | \$300.54 |
|  | Late | 2172014 | 1/26/2014 | $\begin{aligned} & 12 / 3 / 2013 \\ & \text { 1/2014 } \end{aligned}$ | \$23,78 | \$0.00 | (\$230) | \$21149 |
|  |  | 2122014 | 3142014 | 1/1/2014 <br> 2/1/2014 | \$117.33 | \$0.00 | \$56, 48 | \$213.79 |
|  | $\begin{aligned} & \text { Late } \\ & \text { Fee } \end{aligned}$ | 1/26/2014 | 1/26/2014 | $\begin{aligned} & 12 / 32013 . \\ & 1 / 1 / 2014 \end{aligned}$ | \$115.03 | \$000 | 42.30 | \$117.33 |
|  |  | 1/22014 | 1/2/2014 | $\begin{aligned} & 12 / 3 / 2013 \\ & 1 / 1 / 2014 \end{aligned}$ | \$0.00 | \$0,00 | \$115.03 | \$115.03 |



