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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

PURCHASED GAS ADJUSTMENT FILING OF) CASE NO.
JOHNSON COUNTY GAS COMPANY) 2012-00227

MOTION FOR MODIFICATION OF ORDER

Comes Johnson County Gas Company, by and through counsel, and moves to modify the Order of the Commission dated November 29, 2012 (“Order”) as follows:

1. The third numbered paragraph on page three of the Order directs Johnson County Gas Company to “immediately upon receipt of this Order” establish an escrow account for the purpose of depositing “any GCA revenues collected in excess of actual monthly payments for the invoiced cost of gas purchases” from various suppliers for the purpose “to pay back billed invoices from Hall, Stephens & Hall.”
2. Johnson County Gas Company, immediately upon receipt of the Order did establish the interest bearing account directed by the Commission.
3. Hall, Stephens & Hall has continued to supply gas to Johnson County Gas Company since the date of the Order, which has permitted Johnson County Gas Company to supply gas to all of its retail customers through the winter months of 2012-2013 and through the spring of 2013, but has not invoiced Johnson County Gas for such gas supplied.
4. Because the revenues from all sources were insufficient to cover Johnson County Gas Company’s operating expenses without paying Hall, Stephens & Hall for the gas

supplied, Johnson County Gas Company has not been able to comply with so much of the Order as directed that excess GCA revenues be deposited into said account.

5. Currently, Hall, Stephens & Hall is owed more than \$40,000 for gas supplied.
6. In addition, Bud Rife is owed \$21,000 in post-Bankruptcy petition management fees by Johnson County Gas Company.

WHEREFORE, Johnson County Gas Company respectfully moves the Commission to modify so much of its Order as directs that the excess GCA revenues be deposited into the interest bearing account ONLY until such time as the Commission rules on the Alternative Rate case pending before it in Case No. 2012-140.

Respectfully submitted,



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