

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JAMES R. COLLINS)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2015-00185
)	
PEOPLES GAS KY LLC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO JAMES R. COLLINS

James R. Collins ("Complainant"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before November 20, 2015. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Complainant shall make timely amendment to any prior response if he obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Complainant fails or refuses to furnish all or part of the requested information, he shall provide a written explanation of the specific grounds for his failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Complainant shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to Peoples Gas KY, LLC's ("Peoples") response to Commission Staff's First Request for Information ("Staff's First Request"), Item 3, which states in part, "An application was made by Peoples to request service at 54 Collins Heights, Kite, Kentucky on January 16, 2015 on behalf of James Collins. The application was denied by EQT." Does Complainant agree with the assertions made in this statement? If not, state any differences.

2. Refer to Peoples' response to Staff's First Request, Item 1, which states in part:

Peoples submitted an application to EQT, on behalf of the complainant, seeking approval for a tap on well line WL-745315 for a premise located at 54 Collins Heights in Kite, KY. The application was denied for the reason that system constraints would adversely affect EQT's operations. Subsequent to receiving this data request, Peoples and EQT

have further discussed the tap application and EQT has approved the application, effective 9/24/2015. [Please note, Mr. Collins also submitted applications for premises located at 155 Collins Heights, Kite KY; 106 Collins Heights, Kite, KY and 42 Collins Heights, Kite, KY. This still would require only 1 tap. Peoples KY will provide 4 meters.

a. Since the filing of this complaint, has the Complainant received written notification that natural gas service would be made available? If so, provide any documentation received.

b. Describe the Complainant's interest in each of the properties described above, including 54 Collins Heights, 155 Collins Heights, 106 Collins Heights, and 42 Collins Heights, all in Kite, Kentucky.

3. Has a customer line, including all equipment and material required to transfer natural gas from the tap on the gathering line to any of the properties described above in Item 2, been installed? If so, provide the name and address of the contractor who did each of the installations.

4. Did Peoples, or any other entity, furnish the Complainant with construction drawings specifying the installation methods and the materials approved by Commission prior to service installation? If so, provide the documentation received.

5. Does the Complainant currently have natural gas service at any of the above listed locations? If so, describe the location and state the date that service began at each.

6. Was the Complainant charged a service tap fee? If so, provide all documentation showing the amount of the fee and what the fee included.

7. Has the Complainant entered into any written contract or agreement with Peoples, or with any other entity, regarding the terms of the Complainant's natural gas service? If so, provide any such documentation.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED NOV 10 2015

cc: Parties of Record

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