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PUBLIC SERVICE  
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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ALLEGED VIOLATIONS OF KRS 278.020, KRS 278.160, ) CASE NO.  
KRS 278.140, AND 807 KAR 5:006, SECTION 4(2) ) 2017-00120

**ATTORNEY GENERAL'S INITIAL DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Data Requests to Basil C. Pollitt d/b/a The Gas Group, Inc. a/k/a The Gas Group, [hereinafter "Basil Pollitt"] to be answered by August 7, 2017 and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for the companies with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, 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.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams,

cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

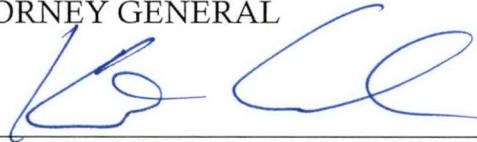
(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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1. Refer to Basil Pollitt's response to Commission Staff's First Request for Information [hereinafter [Staff DR-1"], number 4. Is Basil Pollitt, Gas Group, or Gas Group Inc. registered with the Kentucky Division of Oil and Gas as an active operator? If so, provide any documentation, including but not limited to, a license that evidences such registration.
2. Refer to Basil Pollitt's response to Staff DR-1, number 4, wherein he notes that the source of the natural gas transported via the gas line at issue are located at Dallas Runner and Ray Keown. Provide the permit numbers for all of the wells identified by Basil Pollitt and referenced by him as the source of natural gas.
3. Refer to Basil Pollitt's response to Staff DR-1, number 6, wherein he notes that he has been the person performing meter reading for 25 years. Has any other person or persons performed the function of meter reading for the farm tap meters belonging to the gas line at issue? If so, provide the names and qualifications of the persons performing said function.
4. Refer to Basil Pollitt's response to Staff DR-1, number 6, wherein he notes that he and Bill Bay have performed the leak surveys and patrolling surveys of the gas line at issue. Provide all documentation between January 2017 and today evidencing the dates and results of these surveys.
5. Refer to Basil Pollitt's response to Staff DR-1, number 7, wherein he provides the rates and fees charged to the customers of the gas line at issue. Are these rates and fees on file as a tariff with the Public Service Commission? If not, why not? Has Basil Pollitt, the Gas Group, or any other entity or d/b/a affiliated with Mr. Pollitt ever filed a tariff at the Public Service Commission for the fees and rates to be charged to farm tap customers who belong to the gas line at issue?
6. Does Basil Pollitt file the revenue and losses associated with the gas line at issue on his personal income taxes or as a stand-alone entity? Asked differently, are the revenues and losses associated with the gas line at issue filed on forms under Mr. Pollitt's Social Security number or an Employer Identification Number [EIN]?

7. Refer to Basil Pollitt's response to Staff DR-1, number 12. Is the permit referenced an active permit? Further, provide a copy of said permit.
8. Does Basil Pollitt possess a Gathering Lines Operator's License? If so, is the number of the License GLO 18217000001? If Mr. Pollitt possesses a Gathering Lines Operator's License, and the aforementioned number is incorrect, provide the correct License Numbers. Is any Gathering Lines Operator's License Mr. Pollitt possesses current? Provide a copy of all Gathering Lines Operator's License Mr. Pollitt has received.
9. Refer to Basil Pollitt's response to Staff DR-1, number 2, wherein he states he has one end user associated with his gathering line, Southern Kentucky Energy. In what month and year did Southern Kentucky Energy become an end user of the gas line at issue? Was there an end-user associated with this line immediately preceding Southern Kentucky Energy? When did the last end user associated with the gathering line before Southern Kentucky Energy both begin and end their business with the gas line at issue, and what was the name of that last end user?
10. Refer to Basil Pollitt's responses to Staff DR-1, numbers 6 (a)–(d) and 13, in which he states that he or Bill Bay conduct all maintenance or inspection on the gathering line, and that if Basil Pollitt is unable to monitor calls to his cell phone his wife would respond to calls. How far does Basil Pollitt live from the gathering line? How far does Bill Bay live from the gathering line? Does Bill Bay exclusively work on this gathering line, or does he have other employment or contract work that would preclude him from attending to the gathering line in general, or if an emergency arose?
11. Refer to Basil Pollitt's response to Staff DR-1, number 4, wherein he notes that the source of the natural gas transported via the gas line at issue are located at Dallas Runner and Ray Keown. How many MCF per year do the referenced sources produce and how much of that is transported via the gas line at issue?
12. Is the gas line at issue pressurized?

*Certificate of Service and Filing*

Counsel certifies that an original and ten (10) photocopies of the foregoing were served and filed by hand delivery to Mr. John S. Lyons, Acting Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Pollitt Enterprises, Inc.  
Reg. Agent Whitney Clark Pollitt  
12004 Ridge Road  
Louisville, KY 40245

Kirk Hoskins  
The Landward House  
1387 S Fourth St  
Louisville, KY 40208

This 2<sup>nd</sup> day of August, 2017



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Assistant Attorney General