

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE FILING OF A SPECIAL CONTRACT BY ) CASE NO.  
NATURAL ENERGY UTILITY CORPORATION ) 2018-00164

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO NATURAL ENERGY UTILITY CORPORATION

Natural Energy Utility Corporation ("NEUC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 5, 2018. 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.

NEUC shall make timely amendment to any prior response if it 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 NEUC fails or

refuses to furnish all or part of the requested information, NEUC shall provide a written explanation of the specific grounds for its 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, NEUC 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 NEUC's May 1, 2018 cover letter in Tariff Filing 2018-00207. NEUC states that due to the volume of gas potentially required by the new customer, and the relocation of the delivery point, NEUC will need to install and upgrade "some facilities to accommodate the increased volumes."

a. State whether the service to this customer will be at an existing facility, an expansion of an existing facility, or a new facility.

b. Provide a detailed explanation of the installations and upgrades to facilities that NEUC will need to make in order to accommodate the new customer.

c. Provide a complete breakdown of the total cost that NEUC will expend in order to provide service to the new customer.

d. Confirm that the new customer will be paying for 100 percent of the costs that NEUC expends in order to provide service to the new customer.

2. Confirm that the special contract with the new customer will generate sufficient revenue to cover NEUC's variable costs and contribute to fixed costs.

3. Explain in full detail why NEUC could not provide service to the new customer under NEUC's filed tariffs, but instead must enter a special contract for service.

4. Confirm that the new customer does not currently have, and has not had in the past, gas service at or in the general vicinity of its current location. If this cannot be confirmed, provide the name of the gas supplier(s) and a description of the pipeline facilities that are used to supply the gas.

5. Explain in specific detail the basis for NEUC's assertion that a certificate of public convenience and necessity for the proposed construction project is not necessary, and ensure to cite to the most current statutes and regulations.

6. Explain why NEUC did not request a declaratory ruling regarding whether the proposed project would be exempt under the ordinary course of the business exemption set forth in 807 KAR 5:001, Section 15(3).



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED     **JUN 19 2018**    

cc: Parties of Record

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