

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PHILIP W. WHITLEY)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2023-00052
)	
NATURAL ENERGY UTILITY CORPORATION)	
)	
DEFENDANT)	

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

Natural Energy Utility Corporation (NEUC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 28, 2023. The Commission directs NEUC to the Commission's July 22, 2021 Order in Case No. 2020-000851¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission mandated electronic filing, with exception to pro se formal complaints filed against utilities).

governmental agency, be accompanied by a signed certification of the preparer or the 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 NEUC obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 shall be given to copied and scanned 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, NEUC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

A copy of this request shall be served on Philip W. Whitley by U.S. certified mail, return receipt requested, at 14402 Deerhaven Court, Rush, Kentucky 41102.

1. Refer to NEUC's response to Commission Staff's First Request for Information, Item 3. Please describe attempts made to contact the two other prospective

customers who filled out applications with Mr. Whitley for the extension of the gas main to their properties.

2. Describe the current interest level of the two other customers in obtaining gas service from NEUC. If this is not known, provide confirmation that NEUC has attempted to contact the prospective customers in response to this request for information and the responses of the homeowners' to NEUC's inquiry.

3. Refer to NEUC's response to Commission Staff's Third Request for Information, Item 3. State whether the line to serve Mr. Whitley should be sized to serve additional customers if there is a likelihood that additional customers will be connected to the line.

4. Describe NEUC's practice in providing reimbursement to customers who have paid for a service extension in the event that additional customers are later connected to the extension.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 24 2023

cc: Parties of Record

Case No. 2023-00052

Philip W. Whitley
14402 Deerhaven Court
Rush, KENTUCKY 41168

*Honorable John N Hughes
Attorney at Law
7106 Frankfort Road
Versailles, KENTUCKY 40383

*Natural Energy Utility Corporation
2560 Hoods Creek Pike
Ashland, KY 41102

*Natural Energy Utility Corporation
Natural Energy Utility Corporation
2560 Hoods Creek Pike
Ashland, KY 41102