

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE TARIFF FILING OF APACHE GAS )  
TRANSMISSION COMPANY, INC. AND ) CASE NO. 2000-483  
AN INVESTIGATION OF THE STATUS OF )  
THE FORT KNOX LINE )

COMMISSION STAFF'S INFORMATION REQUEST TO  
BURKESVILLE GAS COMPANY, INC.

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Burkesville Gas Company, Inc. ("Burkesville") file the original and 5 copies of the following information with the Commission within 14 days of the date of this request, with a copy to all parties of record. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. 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.

1. Is Burkesville currently escrowing \$.05 per Mcf for use of the Fort Knox Line as directed in the Order in Case No. 90-290?<sup>1</sup> If no, explain. If yes, provide copies of the bank statements for the year 2000 for the account as well as the Mcf volume of gas transported monthly over the Fort Knox Line for the same period.

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<sup>1</sup> Case No. 90-290, Investigation to Determine Whether an Adequate Means for Delivery of Gas is Available to Ken-Gas of Kentucky, Inc.

2. Burkesville was ordered to file monthly reports showing the amount deposited into the escrow account, as well as the Mcf volume transported over the pipeline. Burkesville has not filed a report since February 25, 2000. Why did Burkesville discontinue the filings?

3. On January 23, 1996, Burkesville entered into a settlement agreement with Bill Nickens.

a. Explain the nature of the case and the issues that were settled.

b. Did Burkesville make all payments as outlined in the settlement agreement?

4. Since Burkesville is recovering the \$.05 per Mcf in its gas cost adjustment, why should Burkesville not be required to escrow those funds?

5. Refer to responses of Burkesville and Apache Gas Transmission Company, Inc. ("Apache") to the Commission's Order dated November 9, 2000.

a. Burkesville provides the name of a third party, Cumberland Mineral Trust, which claimed ownership to the line in previous years. Apache states that in Case No. 90-290, "there were exhibits filed in said case that monies from limited liability partnerships or limited liability companies from Kansas and Missouri had been utilized in the initial construction of such line." Given this information and the fact that a court of competent jurisdiction has not established ownership of the line, why should Burkesville be allowed to discontinue escrowing \$.05 per Mcf?

b. Burkesville states, in Item No. 6 on page 2, that there have been withdrawals from the escrow account. Provide the reasons and amounts for any withdrawals from the escrow account.

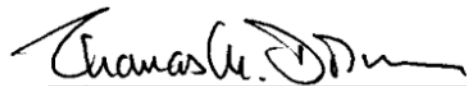
6. Burkesville's tariff includes a copy of an Operations, Maintenance, and Transportation Agreement with Apache dated November 17, 1997. This contract provides for a \$1.05 per Mcf transportation charge. The contract states that \$.05 per Mcf is for gas transmitted through the Fort Knox Line.

a. If Burkesville was escrowing \$.05 per Mcf, explain why it would also have paid Apache this amount.

b. If Burkesville was escrowing \$.05 per Mcf and paying Apache the same amount, explain why it would also bear the cost of maintaining the line.

7. Provide Burkesville's cost to maintain the Fort Knox Line in 2000.

8. In what year did Cumberland Mineral Trust claim ownership of the Fort Knox Line? Is Burkesville aware of any person or entity currently claiming ownership of the line?



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DATED: 2/7/01

cc: Parties of Record