

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 SECOND 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. When applicable, the requested information should be provided for total company operations and jurisdictional operations, separately.

1. In response to Commission Staff's data request No. 3, Burkesville stated that the Texas litigation involved an alleged breach of contract; that Burkesville had made all payments; and that the lawsuit had been dismissed. Burkesville's answer did not state exactly what Burkesville obtained for its payment of the \$14,000. Expand upon your answer as follows:

a. Did the Texas lawsuit involve in any way the determination of ownership of the Fort Knox line? Attach a copy of the complaint filed in the Texas lawsuit.

b. Does Burkesville consider that the settlement of the Texas lawsuit terminates or voids the pipeline lease agreement dated November 26, 1990?

c. Is it Burkesville's opinion that the issue of ownership of the Fort Knox line has been resolved? Explain the answer and, if ownership has not been determined, explain why not, in light of the ownership question's having been an issue in Case Nos. 90-290 and 92-177.

2. Provide the monthly 1999 activity for the Fort Knox line escrow account, including reasons for any withdrawals.


3. Provide the cost incurred by Burkesville in 1999 to maintain the Fort Knox line.

4. Is Burkesville or any of its employees providing maintenance of lines or any other service for Apache Gas Transmission Company, Inc. ("Apache Gas")?

a. If yes, state the type of service, labor hours and labor costs, and all other expenses incurred by Burkesville or its employees to perform maintenance service in 1999. State whether or not the costs to provide these services were included in Burkesville's 1999 annual report filed with the Commission. Provide the invoices from Burkesville to Apache Gas for these services.

5. In response to Staff's data request No. 6(b), Burkesville states that it bills the cost of maintenance of the Fort Knox line against the monies escrowed for the use of the line "pursuant to Case No. 90-290." Provide a copy of the authority in Case

No. 90-290 upon which Burkesville relies as approval for, or as a directive to, maintain the Fort Knox line.



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DATED: 3/26/2001

cc: Parties of Record