

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF WKG STORAGE,)
INC. FOR APPROVAL OF A CHANGE)
IN CONTROL THROUGH ACQUISITION) CASE NO. 2001-235
OF ASSETS OF KENTUCKY PIPELINE)
AND STORAGE COMPANY, INC. AND)
FOR APPROVAL OF TARIFF)

COMMISSION STAFF'S FIRST DATA REQUEST
TO WKG STORAGE, INC.

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that WKG Storage, Inc. ("WKG") shall file the original and 4 copies of the following information no later than September 7, 2001, with a copy to all parties of record. Each copy of the information requested shall be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet shall be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. 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 shall be provided for total company operations and jurisdictional operations, separately.

1. Provide a copy of the latest studies conducted to evaluate the East Diamond Gas Storage Field.
2. Will WKG provide a blanket storage service?
3. Will any party have priority right to storage volume? If so, list the party(s) and the respective priority(s).
4. Provide a copy of the Federal Energy Regulatory Commission certificate for the East Diamond Gas Storage Field.
5. Provide the dollar value, if applicable, of the obligations listed on Schedule 3.4 of the Purchase and Sale Agreement that WKG has agreed to pay, perform, and discharge when due.
6. Provide the original cost and applicable accumulated depreciation for the assets listed on Schedules 1.1(c) and 3.9 of the Purchase and Sale Agreement between WKG and Kentucky Pipeline and Storage Company, Inc. The information should be current as of July 31, 2001 or the most recent date.



Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
Post Office Box 615
Frankfort, Kentucky 40602-0615

DATED: 8/29/01

cc: Parties of Record