

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EQUITABLE)	
PRODUCTION COMPANY TO INCREASE)	CASE NO.
RATES PURSUANT TO KRS 278.485 AND)	2005-00160
807 KAR 5:026, SECTION 9)	

SECOND DATA REQUEST OF COMMISSION STAFF
TO EQUITABLE PRODUCTION COMPANY

Equitable Production Company (“Equitable Production”), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 6 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than June 13, 2005. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Refer to Item 1(b) and Attachment 1-A of Equitable Production’s response to the Initial Data Request of Commission Staff (“Staff’s Request”). Equitable Production states that it purchases 100 percent of the supply used to serve retail customers from third-party suppliers.

a. Explain whether Equitable Production would purchase gas if it had no retail customers.

b. Provide the names of all current third-party gas suppliers and the contracts under which Equitable Production purchases gas from each supplier.

2. Refer to Item 1(c) of the response to Staff's Request. Equitable Production states that its purchased volumes must be calculated because the volumes purchased in Dth exceed the volumes actually consumed in Mcf by the retail customers.

a. Explain whether this is an indication of line loss.

b. If yes, provide the percentage of line loss for each year from 2000-2004.

c. Would the purchases exceed the sales if the comparison were done with like units? Explain the response.

3. Refer to Item 1(d) of the response to the Staff's Request. Equitable Production states that a published independent market price is available to establish an appropriate gas cost rate for its retail customers. Provide the index or indices that Equitable Production would use to determine the charge to retail customers.

4. Refer to Item 3 of the response to Staff's Request.

a. For the 29 facilities listed, explain whether they are compressor stations or gas wells.

b. The heat values were listed for 11 facilities out of 29. For each facility, provide a full gas analysis and the date the sample was taken.

c. Explain whether Equitable Production does periodic sampling for the gas from each facility.

d. Provide the heat value of the gas sold to Columbia Gas Transmission Company ("TCO") and which company, TCO or Equitable Production, does the measurement.

e. Explain whether the gas is processed before injecting it into TCO's pipeline.

f. If the gas is processed, describe the processing plant in detail.

g. For each facility, provide the number of retail customers.

h. Provide the calculation of the average Btu for retail customers.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
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DATED: June 3, 2005

cc: All Parties