

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

COURT OF THREE SISTERS, INC.)	
)	
COMPLAINANT)	CASE NO.
)	2006-00443
VS.)	
)	
NATURAL ENERGY UTILITY CORPORATION)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO NATURAL ENERGY UTILITY CORPORATION

Natural Energy Utility Corporation ("NEUC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 4 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before December 7, 2006. 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.

1. What is the classification of the 6-inch gas pipeline according to 807 KAR 5:022?

2. Is the 6-inch gas pipeline in question providing gas to the residents of the mobile home park?

3. Is there an easement for the subject pipeline along the road of the mobile home park?

4. Provide a map showing the route of the 6-inch pipeline along the location of the mobile home park and locate the areas which show the exposed pipe in the pictures filed with the Commission and attached to NEUC's letter dated October 27, 2006. Include on the map the location of the 24-inch catch basin directed by the Ashland-Boyd County Health Department if known.

5. Explain whether NEUC is aware of the location(s) where Court of Three Sisters, Inc. alleges the gas line is improperly installed. Include in the explanation whether NEUC excavated the pipeline in the location(s) where Court of Three Sisters, Inc. alleges the pipeline is installed improperly.



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED November 22, 2006

cc: All Parties