COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REQUEST FOR DEVIATION OF COW CREEK) CASE NO. 2009-00031

DATA REQUEST OF COMMISSION STAFF TO COW CREEK GAS, INC.

Cow Creek Gas, Inc. ("Cow Creek Gas"), pursuant to 807 KAR 5:001, is to file with the Commission the original and four copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 31, 2009. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Cow Creek Gas shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

Cow Creek Gas fails or refuses to furnish all or part of the requested information, Cow Creek Gas shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

All tax identification numbers, social security numbers, dates of birth, and e-mail addresses of individuals should be redacted (blanked out) from material to be filed herein. Otherwise, careful attention should be given to copied material to ensure that it is legible. 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 separately provided for total company operations and jurisdictional operations.

- In regard to the Cow Creek Gas system, is this request for deviation for
 (a) the system near Allen, Kentucky; (b) the system near Salyersville, Kentucky; or
 (c) both?
- 2. Provide the last 12 months of odorant testing records for all of the systems for which you are requesting a deviation.
- 3. In the request for deviation, it is stated there are "a total of 957 customers including all different companies with distribution and farm taps." Provide the following information for each company:
 - a. Company name;
 - b. Whether company is a production company or a distribution utility;
 - Area or areas of operation;
 - d. Number of customers; and

- e. Customer class or classes (i.e., distribution, farm tap, etc.) and the number of customers in each category.
- 4. Provide the average number of customers that have been "neglected" over the last 12 months with regard to service calls and customers with freeze-offs.
 - a. What impact does this have on your company?
 - b. What impact does this have on your customers?
- 5. In the request for deviation, it is stated that "[w]e stay behind with daily work" and "that can have a major impact on production." Explain on what work you are behind, the impact this has on production, and the impact this has on the safe operation of the system(s).
- 6. Will a cost savings be recognized as a result of conducting monthly odorant tests in lieu of weekly odorant tests? If so, what are those savings?
- 7. Is any portion of any of the systems for which you are requesting a deviation odorized by any means other than natural odorant? If yes, explain.
- 8. Who typically performs the odorant tests for Dema Gas, Inc. and for Cow Creek Gas?
- 9. Are the current odorant tests being performed using an odorometer? How many odorometers are available for conducting the required odorant tests?
- 10. Regulation 807 KAR 5:022, Section 13(17)(g)(1), requires the utility to sample gases in each separately odorized system at the approximate furthest point from injection of the odorant.
- a. How many "separately odorized systems" are being sampled?

 Describe each.

- b. How many sampling points are being tested?
- c. Provide a system map of each system affected by this request and indicate the location (address) of each sampling point.
- d. What is the approximate driving distance between each of the sampling points?

Jeff Derduën / Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED: MARCH 13, 2009

cc: Parties of Record

Jerome A Kanney President Cow Creek Gas, Inc. P. O. Box 3385 Pikeville, KY 41502