

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PURCHASED GAS ADJUSTMENT FILING)
OF JOHNSON COUNTY GAS COMPANY) CASE NO. 2010-00010

SECOND DATA REQUEST OF COMMISSION STAFF
TO JOHNSON COUNTY GAS COMPANY

Johnson County Gas Company ("Johnson County"), pursuant to 807 KAR 5:001, is to file with the Commission the original and two copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. 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 the 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.

Johnson County 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

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

Careful attention shall 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.

1. Refer to the response to item 1d of Commission Staff's Initial Data Request ("Staff's Initial Request") which indicates that Johnson County has been "pulling gas from what is referred to as the 'pool'" since January 2009. Does Johnson County's use of pool gas indicate that it has not put gas on the Columbia Gas Transmission/NiSource pipeline since January 2009? If so, state:

- a. The amount of the current imbalance on the pipeline; and
- b. Whether Johnson County is authorized to take gas from the pool without putting gas on the pipeline and state who provided the authorization.

2. Johnson County's response to item 1e of Staff's Initial Request says that NiSource refused to sign an agreement to be Johnson County's supplier on the routes that currently access the pool of gas from which Johnson County is taking gas. Is Johnson County referring to Columbia Gas Transmission when it says "NiSource"? If not, which entity is referenced? What reason did NiSource give for refusing to supply Johnson County?

3. If an imbalance exists on the NiSource system, confirm that Johnson County is setting aside the revenues it has collected through its GCA to repay the imbalance.

4. For the months April, May, and June 2009, provide:
- a. Actual invoiced Mcf purchases for each month;
 - b. Purchased gas cost for each month as invoiced from suppliers of gas and transportation; and
 - c. Sales for each month.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED: MAR 11 2010

cc: Parties of Record

Bud Rife
Manager
Johnson County Gas Company, Inc.
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