

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED GAS)	CASE NO.
ADJUSTMENT FILING OF CITIPOWER, LLC)	2021-00332

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO CITIPOWER, LLC

Citipower, LLC (Citipower), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on September 16, 2021. The Commission directs Citipower to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Citipower shall make timely amendment to any prior response if Citipower obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Citipower fails or refuses to furnish all or part of the requested information, Citipower 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. When filing a paper containing personal information, Citipower shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Gas Cost Recovery (GCR) rate report, Schedule 1, GCR Rate Summary, Actual Cost Adjustment (ACA) Calculation, Previous Quarter Reported ACA rate of (\$.0001) per Mcf. Confirm that this was the Quarter ACA approved by the Commission in Case No. 2021-00219.²

2. Refer to the GCR rate report, Quarterly Report of Gas Cost for Schedule 2 – Expected Gas Cost. Provide justification for the Citigas \$1.1022 per Mcf rate.

² Case No. 2021-00219, *Electronic Purchased Gas Adjustment Filing of Citipower, LLC* (Ky. PSC June 9, 2021).

3. Refer to the GCR rate report, the April, May, and June 2021 Invoices from Citigas, LLC (Citigas).
 - a. Explain in detail what is included in the “Invoiced from Greystone, LLC (Greystone)” Marketing fee of \$.932 per Mcf.
 - b. Explain how the “Invoiced from Greystone” Marketing fee is determined and what causes that fee to change each quarter.
4. Explain the current relationship between Citipower, Greystone, and Citigas in detail.
5. For each customer class provide the sales amount for each month between the period of July 2020 through June 2021.
6. Explain how Citipower determines its monthly sales amounts as reported in its quarterly GCR rate reports.
7. Explain why the monthly sales are the same as the monthly purchases in Citipower’s GCR rate report.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED SEP 08 2021

cc: Parties of Record

*CitiPower, L.L.C.
37 Court Street
P. O. Box 1309
Whitley City, KY 42653

*Adam Forsberg
Controller
Citipower L.L.C.
2122 Enterprise Road
Greensboro, NORTH CAROLINA 27408