

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF)	
JURISDICTIONAL STATUS OF LINDSEY)	CASE NO.
ENTERPRISES, LLC AND OF ITS COMPLIANCE)	2023-00207
WITH KRS CHAPTER 278, 807 KAR CHAPTER)	
005, AND 49 CFR PARTS 191 AND 192)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO LINDSEY ENTERPRISES, LLC

Lindsey Enterprises, LLC (Lindsey Enterprises), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 1, 2023. The Commission directs Lindsey Enterprises 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 question to which the response is made and 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

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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Lindsey Enterprises shall make timely amendment to any prior response if Lindsey Enterprises obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Lindsey Enterprises fails or refuses to furnish all or part of the requested information, Lindsey Enterprises shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Lindsey Enterprises shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the number of customers, including addresses, who currently receive service from Lindsey Enterprises, state whether all of the customers are within one-half air mile of Lindsey Enterprises wells or lines, and state whether any customers are "free gas" customers.

2. Provide the addresses of all customers who have stopped receiving service from Lindsey Enterprise for any and all reasons for the past 12 months.

3. Provide all current rates being charged to all classes of customers, residential or commercial, and any changes to those rates, whether increase or decrease, in the past 12 months, and confirm that these are the rates charged to the Fords Branch customers.

4. Provide diagrams of the entire natural gas system, accompanied with a detailed written explanation for each diagram, under company control. This response may be accompanied by a request for confidential treatment pursuant to 807 KAR 5:001, Section 13, if necessary.

5. Indicate the Maximum Allowable Operating Pressure (MOAP) of all lines listed in the diagrams.

6. Provide all information regarding tariff(s) on file or previously on file with the Commission for Lindsey Enterprises and any predecessor.

7. Provide a list of all gas lines that have been terminated, abandoned, or disconnected in the past 2 years. For each identified gas line, include a basis for that action. This is an ongoing request.

8. Provide all alternate energy sources available to current Lindsey Enterprises customers if termination of service occurs.

9. State the number of end-use natural gas customers served by Lindsey Enterprises that are specifically in the Fords Branch area.

10. State how long Lindsey Enterprises has provided service to the Fords Branch customers.

11. Provide all billing records, for Lindsey Enterprises Customers in the Ford's Branch region for the past three years. Include billing records for all customers who have experienced a cessation of services in the last 12 months.

12. Provide all records of any agreements, proposed or executed, between Lindsey Enterprises and its customers in the Fords Branch region.

13. State the source of the gas provided to the Fords Branch customers.

14. State the distance of the Fords Branch customers from the line(s) of Lindsey Enterprises. Specifically, whether all the customers are within one-half air mile.

15. State whether the line serving the Fords Branch customers ultimately delivers gas into the wholesale market, or it is strictly used to deliver gas to the end-use customers.

16. Describe the character of service provided by Lindsey Enterprises to the Fords Branch customers. The response should include, but not be limited to, the quality and heat content of the gas, whether the gas is odorized, whether compression equipment is operated to serve the customers, the age of the lines serving the customers, the line loss percentage of the lines serving the customers, the material from which the lines are constructed, the frequency of billing and facilities inspections by Lindsey Enterprises personnel, and the age of the meters.

17. Provide the annual Mcf usage of each Fords Branch customer for the calendar years 2021 and 2022.

18. Explain why Lindsey Enterprises decided to terminate service to the Fords Branch customers.

19. State whether the well and line(s) used to provide gas service to the Fords Branch customers will continue to be in use if Lindsey Enterprises were to terminate service to these customers.

20. In Case No. 1991-00375,² the Commission investigated Lindsey and Elliott Gas Company's proposed action to shut in a well and abandon a pipeline that served 58 farm tap customers. State whether this is the same entity currently operating as Lindsey Enterprises. If so, state whether this entity continued to serve other farm tap customers after the discontinuance of service to the customers that were the subject of Case No. 1991-00375, and whether this entity was ever regulated as a utility.



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P.O. Box 615
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DATED OCT 19 2023

cc: Parties of Record

² Case No. 1991-00375, *In the matter of an investigation of Lindsey and Elliott Gas Company* (Ky. PSC Nov. 25 1991).

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