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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	)	
	)	
REBECCA HALL	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO. 2007 - 00471
	)	
MIKE LITTLE GAS COMPANY, INC.	)	
	)	
DEFENDANT	)	

DEFENDANT'S RESPONSE TO  
COMMISSION STAFF'S FIRST DATA REQUEST

COMES NOW Mike Little Gas Company, Inc. (MLG), and makes its response to the Commission Staff's First Data Request. Said Responses were written, complied and verified by Donald (Sam Vance) Certified Operator for MLG and Miki Thompson, President and Counsel for MLG.

1. Sheet 7( C ) of Mike Little's tariff requires that any request for service be made on the company's standard application form or contract form. Did Rebecca Hall sign an application form or a contract for service? If yes, provide a copy.

**ANSWER: Rebecca Hall filled out an application for service on 9/19/07, a copy of which is attached hereto, marked as Exhibit #1, and made part of the record herein.**

2. Explain specifically the reasons the application or contract was rejected. State whether Rebecca Hall received a written rejection.

**ANSWER: The Hall application was rejected due to the fact that there is no reasonably safe way to tap an access line to provide service to the complainant.**

**The main access line in that location is plastic encased in metal. In order to make a tap, the metal pipe would be cut in two locations in attempt to expose the plastic line. After the cuts, it would be necessary to remove the metal from around the plastic line. A welder would need to be used to split the metal pipe to remove it from the plastic. This could not be done**

safely. That much heat near the plastic pipe would create a risk of explosion and fire, or at minimum, cause damage to the main access line.

Recently, MLG Operator Sam Vance contacted KGA educator and consultant Roger Wingate to discuss the connection. Mr. Wingate agreed and informed that in his opinion, the tap could not be made without the risk of fire or explosion or causing a negative effect to the integrity of the plastic line.

Rebecca Hall's application for service was denied on October 9, 2007, per phone by MLG Office Manager, Virginia Gibson.

3. a. Does the Rebecca Hall property have access to a distribution main of Mike Little?

**ANSWER: The Hall property does have access, however the access is not reasonable.**

- (1) If yes, state the approximate distance from the main to the property line.

**ANSWER: The distribution main is approximately 20 - 30 feet from Ms. Hall's property, however, distance is not a material factor in the decision to deny the Hall application.**

- (2) If no, provide the approximate distance the distribution main would have to be extended to reach the property line.

**ANSWER: N/A The physical distance is not an issue for MLG.**

- (3) Has Mike Little estimated the cost to place a service line from the property line to the building?

**ANSWER: Yes**

If yes, provide the estimated cost.

**ANSWER: As stated in its Answer herein, it is estimated that the connection of complainant would cost MLG more than one thousand dollars (\$1,000), which would include extra plastic line, couplings, saddle, extra service workers and parts. Upon further inquiry, MLG has determined that the extra contract labor**

**would be considerably more than first anticipated in that it would cost \$24 per hour for extra service contract workers rather than the \$10 per hour as calculated above. Therefore, MLG would amend the estimate to \$1,300.**

- b. Does Mike Little have employees to install the tap and lines or does it contract this service from an outside vendor?

**ANSWER: MLG has qualified and certified employees to do the job, however, they do not believe that they can do the tap safely and without risk of explosion, therefore, MLG would be forced to hire outside vendors.**

4. Mike Little states in its answer to the complaint that its employees have made several visits to the home of Rebecca Hall. Explain the purpose and result of each visit.

**ANSWER: In the course of the investigation of providing service to Rebecca Hall, technicians Lane Bailey and Sam Vance went to the Hall single wide mobile home in Maytown. They determined that the distribution main at the point where the connection would be made consists of a plastic line encased in metal. After making that determination, MLG requested Certified Operator Mike Tackett along with Greg Howell from Columbia Gas to inspect the site. It was then determined that a connection for service could be made, but there would be considerable risk of gas leaking into the metal pipe creating static electricity, thus causing an increased risk of explosion. This information was provided to MLG management, Kara Vance and Miki Thompson. Vice President Kara Vance then went to Ms. Hall's home and discussed the service with her. Ms. Hall informed that she was merely wanting to use a small gas appliance to supplement her heating system. After inspection of the site and taking into consideration the minimal usage and needs of Ms. Hall, MLG management decided to deny her application for service.**

5. In its answer, Mike Little made reference to 807 KAR 5:011, Section 9. Did Mike Little intend to refer instead to 807 KAR 5:022, Section 9?

**ANSWER: Yes, there was a typographical error in the Answer.**

6. Miki Little states in its answer that, if provided service, the Complainant would be required to pay a deposit equal to 2 months of an estimated bill. Is Mike Little aware that its tariff requires a fixed customer deposit of \$100 rather than a calculated deposit?

**ANSWER: Yes. Mike Little is reminded that there is a fixed customer deposit of \$100 and hereby requests to amend its answer accordingly.**

RESPECTFULLY SUBMITTED,  
MIKE LITTLE GAS COMPANY, INC.

By:

  
HON. MIKI THOMPSON  
PRESIDENT AND COUNSEL

Hon. Miki Thompson, #84602  
Thompson Law Office  
35 West 3rd Avenue, Suite 106  
Williamson, WV 25661

**CERTIFICATE OF SERVICE**

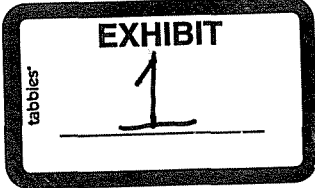
This is to certify that I have served a true and exact copy of the foregoing *RESPONSE* by facsimile to 502-564-3460 and by U. S. Mail postage prepaid to the following:

Commonwealth of Kentucky  
Public Service Commission  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, Kentucky 40602-0615  
502-564-3460

Rebecca Hall  
Box 23  
Langley, KY 41645

Dated this the 13<sup>TH</sup> day of December, 2007.

  
Hon. Miki Thompson, President



Mike Little Gas Company, Inc.

P.O. BOX 69  
MELVIN, KENTUCKY 41650

Phone  
606-452-2475

APPLICATION FOR SERVICE

DATED: 9/19/07

Application is hereby made by Rebecca Hall for delivery of natural gas by meter located at 75 N May St which the applicant is the owner (owner, renter, other).

In consideration of the delivery of natural gas to the applicant by Mike Little Gas Co., Inc. (MLG), the applicant hereby agrees:

(1) To pay for all gas delivered to the premises named above, and to settle all bills monthly within the time specified on the bill rendered. All accounts shall become due and payable upon discontinuance of service.

(2) To pay for all gas delivered to the premises up to five (5) days after applicant notifies MLG in writing or by phone to disconnect services at said premises.

(3) To provide access and/or right of way for MLG to install gas line, set meter, maintain company equipment, and to read meter.

(4) To comply with all regulations and rules of MLG and Public Service Commission on customer side of meter.

(5) To allow MLG access to inside premises for inspection prior to turning services on.

This application shall not be binding until approved and signed by authorized agent of MLG and the appropriate charges paid by applicant.

AGENT FOR MLG

Rebecca Hall  
APPLICANT

METER NUMBER

P.O. Box 23 75 N May St  
ADDRESS

METER READING

Langley Ky. 41645  
CITY, STATE, ZIP  
PHONE: 606-285-9288

**VERIFICATION**

**STATE OF WEST VIRGINIA,**

**COUNTY OF MINGO, TO-WIT:**

This day personally appeared before me, the undersigned, who after being by me first duly sworn, upon oath says that the facts and allegations contained in the foregoing

*Response*

are true, except where they are therein stated to be upon information, and that so far as they are therein stated to be on information, believes them to be true.

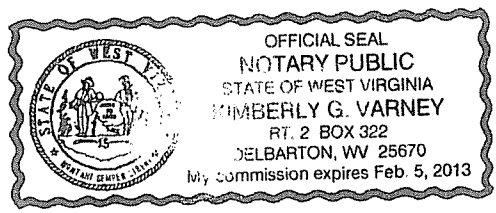
*W. H. H.*  
\_\_\_\_\_  
**AFFIANT**

Taken, subscribed and sworn to before me this 13<sup>th</sup> day of December, 2007.

My commission expires Feb. 5, 2013.

*Kimberly G. Varney*  
\_\_\_\_\_  
**NOTARY PUBLIC**

(NOTARIAL SEAL)



**VERIFICATION**

STATE OF WV,

COUNTY OF MINGO, TO-WIT:

This day personally appeared before me, the undersigned, who after being by me first duly sworn, upon oath says that the facts and allegations contained in the foregoing

*Response*

are true, except where they are therein stated to be upon information, and that so far as they are therein stated to be on information, believes them to be true.

*Miki Krout*  
\_\_\_\_\_  
AFFIANT

Taken, subscribed and sworn to before me this 13<sup>th</sup> day of

December, 2007.

My commission expires Feb. 5, 2013.

*Kimberly G. Varney*  
\_\_\_\_\_  
NOTARY PUBLIC

(NOTARIAL SEAL)

