

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PURCHASED GAS ADJUSTMENT	)	CASE NO.
FILING OF CITIPOWER, LLC	)	2015-00073

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

Citipower, LLC ("Citipower"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due within seven days from 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.

Citipower 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 requests 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 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 response to Appendix B of the Commission's Order in Case No. 2014-00426.<sup>1</sup> Confirm that Citipower billed a Gas Cost Recovery ("GCR") rate of \$6.0605 per Mcf for the months of October through December 2014. If this cannot be confirmed, state what GCR rate was billed.

2. Refer to the Application, Schedule IV, Actual Adjustment.

a. Provide the Total Cost of Volumes Purchased for December 2014, broken down between Citigas, LLC ("Citigas") and Citizens Gas Utility District ("Citizens Gas").

b. Provide bills from Citigas and Citizens Gas for October, November, and December 2014.

3. a. Explain how Citigas bills Citipower for monthly purchases. The explanation should specifically include whether the monthly bills are based on the NYMEX price quoted in the letters provided in Citipower's GCR filings, or whether

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<sup>1</sup> Case No. 2014-00426, *Purchased Gas Adjustment Filing of Citipower, LLC* (Ky. PSC Dec. 22, 2014).

Citigas's monthly prices to Citipower are based on the current market price of gas during each specific month.

b. Refer to the Application, Schedule IV, Actual Adjustment. If monthly prices to Citipower are based on the NYMEX price quoted in the letters provided in Citipower's GCR filings, explain why the Unit Cost of Gas is not the same as the \$5.1412 EGC in Effect for Month for October and November 2014. If monthly prices to Citipower are based on the current market price of gas during each specific month, explain the basis for the monthly pricing from Citigas, whether it is NYMEX-based, or whether some other pricing method is used.



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Jeff DeRouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED MAR 11 2015

cc: Parties of Record

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