

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOHN PRESTON)	
COMPLAINANT)	CASE NO.
V.)	2015-00186
PEOPLES GAS KY, LLC)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO PEOPLES GAS KY, LLC

Peoples Gas KY, LLC ("Peoples"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 14 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 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.

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

Careful attention should 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 document containing personal information, Peoples shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to John Preston's May 13, 2015 complaint letter and to the July 1, 2015 Answer of Peoples Gas KY, LLC ("Answer"). State whether it is the understanding of Peoples that the complainant is eligible to receive gas service pursuant to KRS 278.485 and 807 KAR 5:026, the statute and regulation governing the provision of service from gas pipeline companies obtaining gas from producing wells to owners of property on or over which any producing well or gas gathering pipeline is located or whose property and point of desired service is within one-half air-mile ("farm tap service").

a. If so, state whether it is the understanding of Peoples that KRS 278.485 requires that eligible property owners be provided farm tap service if service is requested and that the request cannot be refused unless the producing gas well or gathering pipeline is abandoned or is subject to federal jurisdiction.

b. If so, provide an explanation for the denial of farm tap service to the complainant. The explanation should include copies of any correspondence or electronic mail ("email") messages from EQT Production or any affiliate ("EQT") relating to the basis of the denial referenced in the Answer.

c. If the denial of farm tap service is due to any reason other than the abandonment of the gas well or gathering pipeline or their being under federal jurisdiction, state whether it is Peoples' understanding that the denial is in violation of KRS 278.485.

d. If the denial of farm tap service to an eligible customer is due to any reason other than the abandonment of the gas well or gathering pipeline or their being under federal jurisdiction, and if the eligible customer continues to be denied service, state what entity, in the opinion of Peoples, would most appropriately be the subject of a subsequent Commission investigation to determine possible penalties.

e. Confirm that EQT denied the request for farm tap service and that EQT itself was not denied by another entity, as implied by statement 3 of the Answer.

2. Provide copies of all contracts between Peoples and EQT or any affiliate of EQT.

3. Describe the process to request a farm tap service from EQT. Provide copies of all correspondence and email messages between Peoples and EQT concerning Mr. Preston's request for farm tap service.

4. Describe the gathering line system to which the farm tap service connection was denied and provide a map with details including the size of pipelines and locations of gas wells.

5. State whether the gathering line system is connected to the systems subject to Case Nos. 2015-00184¹ and 2015-00185.²

6. State whether any customer(s) eligible for farm tap service other than those represented by this complaint and by those that are the subject of Case Nos. 2015-00184 and 2015-00185 have been denied service. If so, state how many and provide details concerning each denial.

7. The complainant's claim against EQT and Peoples states, "[w]hen I first applied I was approved. I bought property and started building a home." State whether Peoples agrees with each of these statements made by Mr. Preston. Explain.

8. The complainant's claim against EQT and Peoples also states that after he bought property and built a home he "asked if I could start laying the gas line and they said not until they get something in writing. So about 2 week[s] later they called me and said I was denied." State whether Peoples agrees with each of these statements made by Mr. Preston. Explain.

9. State whether Peoples is aware of Mr. Preston's ever having been approved for a new meter tap and natural gas service to his property. If so, state who approved the request and when the approval was given.

10. With regard to the Complaint, state whether it is Peoples' understanding that EQT now or previously provided farm tap service to end-use customers other than through Peoples.

11. Refer to the letter from David W. Reiss, EQT, to Tena Noble, Peoples Natural Gas, dated April 9, 2015, regarding a new capacity request for John D. Preston,

¹ Case No. 2015-00184, *Mark S. Carter v. Peoples Gas KY, LLC* (filed Apr. 30, 2015).

² Case No. 2015-00185, *James R. Collins v. Peoples Gas KY, LLC* (filed Apr. 30, 2015).

a copy of which is attached as an Appendix hereto and incorporated herein.

a. Is Tena Noble currently employed by Peoples? Was she employed by Peoples on April 9, 2015? If so to either, state in what capacity she was employed.

b. Mr. Reiss's letter states, "Peoples Natural Gas' request for a new meter tap into EQT Gathering, LLC's ("EQT") Line WL004820 is denied." Describe the function and location of Line WL004820 with regard to the Preston property. Has this line been abandoned? Is this line subject to federal jurisdiction?

c. How does Peoples interpret EQT's denial of service to the Preston property "[d]ue to constraints that will adversely affect its operations"?

d. Mr. Reiss's letter further states that EQT is "unable to accommodate the requested volume at this time." What was the "requested volume" referenced?



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED SEP 17 2015

cc: Parties of Record

Case No. 2015-00186

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2015-00186 DATED **SEP 17 2015**



April 9, 2015

Tena Noble
Peoples Natural Gas
1291 W. Main St.
Monongahela, PA 15063

Re: **New Capacity Request**
John D. Preston

Dear Ms. Noble,

This letter is to inform you that Peoples Natural Gas' request for a new meter tap into EQT Gathering, LLC's (EQT) Line WL004820 is denied. EQT is denying Peoples Natural Gas' request due to constraints that will adversely affect its operations.

EQT regrets that it is unable to accommodate the requested volume at this time. Thank you for your interest in operating on EQT. Should you have any questions, please send correspondence to eqtmtrtap@eqt.com.

Sincerely,

David W. Reiss

David W. Reiss

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