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RECEIVED

FEB 03 2016

PUBLIC SERVICE
COMMISSION

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OVERNIGHT DELIVERY

February 2, 2016

Kentucky Public Service Commission
211 Sower Blvd.
PO Box 615
Frankfort, Kentucky 40602

RE: WKG Storage, Inc.
Case No. 2016-00053

Dear Sir:

I am enclosing herewith an original, plus ten (10) copies, of a Motion to Reconsider, as well as an original, plus ten (10) copies, of a Response to Filing Deficiency Letter and Motion for Enlargement of Time.

If you have any questions concerning this, please let me know. Thank you.

Very truly yours,



T. Tommy Littlepage

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

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FEB 03 2016

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

APPLICATION OF WKG STORAGE, INC. FOR)
AN ADJUSTMENT OF RATES PURSUANT) Case No. 2016-00053
TO 807 KAR 5:076)

RESPONSE TO FILING DEFICIENCY LETTER
AND
MOTION FOR ENLARGEMENT OF TIME

Comes WKG Storage, Inc. ("WKG"), by counsel, and respectfully moves the Commission for an enlargement of time to comply with the Commission's Filing Deficiency Letter dated January 29, 2016 (the "Deficiency Letter"). The Deficiency Letter identified three (3) categories of deficiencies:

1. Failure to comply with the Notice requirements of 807 KAR 5:001, Section 5(4).
2. Failure to have filed with the Commission annual reports for the immediate past year and for the two (2) prior years.
3. Failure to use a twelve (12), month historical test year, adjusted for known and reasonable changes, that coincides with the reporting period of applicants annual report for the immediate past year.

The deficiencies noted in Item (1) of the Deficiency Letter can and will be cured readily. WKG has one customer and the attached revised notice is being sent to that customer. Proof of service of the Notice will be filed of record.

The deficiencies noted in Item (2) of the Filing Deficiency Letter cannot be complied with as WKG is not required to file annual reports with the Commission and accordingly none have been filed. Since WKG qualified, in all other respects, for filing an alternative rate adjustment proceeding for small utilities under 807 KAR 5:027, et. seq., WKG filed with its Application a letter seeking a deviation from the requirements of 807 KAR 5:076, Section 2(3) and 807 KAR 5:076, Section 3(1). This request for deviation was filed in letter form as required by 807 KAR 5:076 (17), rather than by a motion for deviation.

Contemporaneous with the filing of this Response and Motion, WKG is filing a Motion for Reconsideration relating to the deficiencies under Item (2) relating to annual reports.

The deficiency noted in Item (3) of the Filing Deficiency Letter relating to use of the twelve (12) month historical test period can, and will be, cured by WKG. However, additional time is needed in order to prepare and finalize the requisite historical test period data and adjustments.

The Deficiency Letter, entered on January 29, 2016 allows WKG ten (10) days to comply. An additional ten (10) days is requested, or a total of twenty (20) days from January 29, 2016, to cure the deficiencies noted in Item (3) of the Deficiency Letter.

Respectfully submitted this 2nd day of February, 2016.



T. Tommy Littlepage
WILSON, HUTCHINSON & LITTLEPAGE
611 Frederica Street
Owensboro, Kentucky 42303
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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2016 the original of this Application, together with ten (10) copies were filed with the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602, by overnight delivery and to the Attorney General, 1024 Capital Center Drive, Suite 200, Frankfort, Kentucky 40602 by United States Postal Service.



T. Tommy Littlepage

Rob Ellis
WKG Storage, Inc.
381 Riverside Drive Suite 120
Franklin, TN 37064
rob.ellis@atmosenergy.com

February X, 2016

VIA ELECTRONIC MAIL

Atmos Energy Corporation
Attn: Contract Administration
5430 LBJ Freeway, Suite 1600
Dallas, TX 75240

To Whom it May Concern:

Notice of Proposed Rate Adjustment

1. WKG Storage, Inc. filed an application on January 21, 2016 with the Kentucky Public Service Commission and anticipates that filing becoming effective on February 18, 2016.
2. The present storage transportation (injection) rate is \$0.1500/1000 cubic feet and the proposed rate will be \$0.1649/1000 cubic feet. The present storage transportation (withdrawal) rate is \$0.1500/1000 cubic feet and the proposed rate will be \$0.1649/1000 cubic feet. The present storage reservation rate is \$0.0500/1000 cubic feet and the proposed rate will be \$0.0824/1000 cubic feet. This will apply to firm storage customers, the only class of customer served under the tariff, which includes Atmos Energy Corporation.
3. The amount of the proposed rate change for injection and withdrawal charges is \$0.0149/1000 cubic feet and the percentage change is 9.9333%. The amount of the proposed change for reservation charges is \$0.0324/1000 cubic feet and the percentage change is 64.8000%. This will apply to firm storage customers, the only class of customer served under the tariff, which includes Atmos Energy Corporation.
4. Atmos Energy Corporation is the only customer served under this tariff and its bill is calculated on a demand basis, regardless of usage. Atmos Energy Corporation's new monthly bill would be \$177,876, an increase of \$55,376 per month.

5. A person may examine this application during business hours at the office of:

WKG Storage, Inc.
295 N Hubbards Ln Suite 103
Saint Matthews, KY 40207

6. A person may examine this application at the Commission's office at 211 Sower Boulevard, Frankfort, KY Monday- Friday, 8 a.m. - 4:30 p.m. or through the Commission's website at <http://psc.kv.gov>.
7. Comments regarding the application may be submitted to the Commission through the Commission's Website or via mail at Public Service Commission, P.O. Box 615, Frankfort, KY 40602.
8. The rates contained in this notice are the rates proposed by WKG Storage, Inc. but the Public Service Commission may order rates to be charged that differ from the proposed rates contained in this notice.
9. A person may submit a timely written request to intervene to the Public Service Commission, P.O. Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request and including the statutes and interest of the party.
10. If the Commission does not receive a written request for intervention within 30 days of initial publication or mailing of notice, the Commission may take final action on the application.

Sincerely,

Rob Ellis
Vice President
WKG Storage, Inc.

rob.ellis@atmosenergy.com