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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF WKG STORAGE, INC. FOR	)	CASE NO.
RATE ADJUSTMENT FOR SMALL UTILITIES	)	2016-00053
PURSUANT TO 807 KAR 5:076	)	

ATTORNEY GENERAL'S REQUEST FOR INFORMATION

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Requests for Information to WKG Storage, Inc. (WKG), subject to Commission granting Attorney General intervenor status, to be answered by the date specified in the Commission's Order of Procedure, or if amended, on the amended date ordered by the Commission, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for WKG with an electronic version of these questions, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, 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.

(6) If you believe any request appears confusing, please request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts

thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other

forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) The Attorney General reserves the right to pose additional supplemental data requests on or before the due date specified in the Commission's procedural schedule.

Respectfully submitted,  
ANDY BESHEAR  
ATTORNEY GENERAL



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KENT CHANDLER  
REBECCA GOODMAN  
LAWRENCE W. COOK  
ASSISTANT ATTORNEYS GENERAL  
1024 CAPITAL CENTER DRIVE  
SUITE 200  
FRANKFORT, KY 40601-8204  
(502) 696-5458  
FAX: (502) 573-1009  
[Kent.chandler@ky.gov](mailto:Kent.chandler@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[Rebecca.Goodman@ky.gov](mailto:Rebecca.Goodman@ky.gov)

*Certificate of Service and Filing*

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to James W. Gardner, Acting Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

T. Tommy Littlepage  
Wilson, Hutchinson & Littlepage  
611 Frederica Street  
Owensboro, KENTUCKY 42301

WKG Storage, Inc.  
2929 W Sam Houston Pkwy  
Houston, TX 77043

Atmos Energy Company  
Atmos Energy Corporation  
3275 Highland Pointe Drive  
Owensboro, KY 42303

This 25<sup>st</sup> day of March, 2016



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Assistant Attorney General

Application of WKG Storage, Inc. for Rate  
Adjustment for Small Utilities Pursuant to 807 KAR 5:076  
Case No. 2016-00053  
Attorney General's Request for Information

1. Refer to the Company's Notice of Proposed Rate Adjustment contained in its February 29, 2016 Revised Application filing.
  - a. Please define the Atmos Energy Corporation - Kentucky Division account number or numbers in which storage and injection charges and reservation charges from WKG Storage, Inc. are recorded. In addition, please provide a description of those accounts and indicate if those accounts include charges from any other sources.
  - b. Please provide the amount of WKG Storage, Inc. charges by type included in the base period for the Kentucky Division in the Rate Case filing in Case No. 2015-00343.
  - c. Please provide the amount of WKG Storage, Inc. charges by type included in the test year for the Kentucky Division in the Rate Case filing in Case No. 2015-00343.
  - d. Please describe any and all adjustments made in the Rate Case filing in Case No. 2015-00343 to account for the rate changes, or any portion thereof, sought by WKG Storage, Inc. in its revised application.
  - e. Please indicate whether WKG Storage, Inc.'s monthly charge for storage and injection charges is included in the determination of Atmos Energy Corporation - Kentucky Division's PGA rates. If so, describe how and in what amounts. If not, explain why not.
  - f. Please indicate whether WKG Storage, Inc. monthly charge for reservation charges is included in the determination of Atmos Energy Corporation - Kentucky Division's PGA rates. If so, describe how and in what amounts. If not, explain why not.
2. Please provide citations as to when and how current rates were set.
3. Please describe in detail whether current rates were set based on a revenue requirement determination or some other method.
4. Refer to the Company's Notice of Proposed Rate Adjustment contained in its February 29, 2016 Revised Application filing. Please describe what costs have increased and the reasons for the increases that would justify an 18.0666% increase in storage and injection charges and a 77.0000% increase in reservation charges.

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5. Please explain in detail the process WKG Storage Inc. took in purchasing the storage facilities it uses today. For instance, were any other entities under the control of Atmos Energy involved, such as Atmos Pipeline and Storage?
6. Please provide the facts and circumstances surrounding WKG Storage Inc.'s purchase of Kentucky Pipeline and Storage Company, Inc., including any purchase agreements or documents that reflect the relationship between Kentucky Pipeline and Storage and all customers it had before the purchase. Further, please provide the process WKG Storage took after that purchase with those, or any new customers.
7. When WKG Storage Inc. was created, what entity or entities initially capitalized the company and what entity today owns WKG Storage? Please include the names and amount of ownership if multiple entities own WKG Storage. Since inception, if WKG Storage has undergone any change in ownership, please provide the dates and process of each change.
8. Has WKG Storage Inc. invested in or purchased additional significant assets since inception, except for those purchased from Kentucky Pipeline and Storage Company Inc.? If so, please provide those assets, and the function they perform for the company.
9. Has WKG Storage Inc. filed the necessary reports to the Kentucky Department of Revenue since its inception, pursuant to KRS 136.120, and KRS 136.130-136.140? If so, please provide these reports.
10. Has WKG Storage Inc. filed documents such as annual reports, etc., with the Public Service Commission since its application for a CPCN to purchase Kentucky Pipeline and Storage Company Inc. until its application for an ARF? If so, please provide these filings and documents.
11. Has WKG Storage Inc. filed any reports with any regulatory body since its application for a CPCN to purchase Kentucky Pipeline and Storage Company Inc.? If so, please identify the type of filing, the date of filing and the regulatory body filed with.



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12. Has WKG Storage earned a rate of return on its revenue derived from its relationship with Atmos since its purchase of Kentucky Pipeline and Storage Company Inc.? If so, what rate?
13. Was Kentucky Pipeline and Storage Company providing the same services at the same rates to Atmos when it was purchased by WKG Storage?
14. How did WKG Storage come to determine the rate it currently charges to Atmos?
15. Does WKG Storage intend to provide service or rates to any entity other than Atmos? If so, what process has WKG Storage taken to add more customers, and what documentation does WKG have to show this process is being undertaken? Please provide documentation if so.
16. How much of WKG's storage capability is Atmos contracted to use? Please provide the total amount of WKG's storage capability and Atmos' demand for that storage over the past 5 years.
17. Does WKG provide any service outside of that provided by Kentucky Pipeline and Storage Company Inc.? If so, to what customers and at what rates? How were these rates sets?
18. Please provide the adoption notice pursuant to Administrative Regulation 807 KAR 5:011, ordered to be filed with the Commission in Case No. 2001-00235.