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September 29, 2016

L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KY 40504

RE: Martin Gas, Inc.
Case No. 2016-00332 - Filing Deficiencies

The Commission Staff has reviewed the application in the above case. This filing is rejected for the reasons set forth below.


Filing deficiencies pursuant to:

- (1) 807 KAR 5:076: Section 4(1)(b) – Copy of all outstanding evidences of indebtedness, such as mortgage agreements, promissory notes, and bond resolutions.
 - Deficiency relates to the Community Trust Bank loan shown in Martin's 2015 annual report as having a year-end balance of \$17,605.
- (2) 807 KAR 5:076: Section 4(1)(c) – Copy of amortization schedule for each outstanding bond issuance, promissory note, and debt instrument.
 - Deficiency relates to the Community Trust Bank loan shown in Martin's 2015 annual report as having a year-end balance of \$17,605.
- (3) 807 KAR 5:076: Section 5(4)(c) – Does notice of proposed rate adjustment meet regulatory requirements?
 - Notice included amount of change requested in percentage but not in dollar amounts.
- (4) 807 KAR 5:076: Section 4(1)(f) – Detailed Analysis of Applicant's customers' bills showing revenues from present and proposed rates from each customer class (Attachment BA-DB or Attachment BA-FR is attached to ARF Form-1).
 - Instructions and example are attached for your reference.
- (5) 807 KAR 5:076: Section 4(1)(h) – Statement of Disclosure of Related Transactions, ARF Form-3, for each member of the utility's board of commissioners or board of directors, each person who has an ownership interest of ten (10) percent or more in the utility, and the utility's chief executive officer.

The statutory time period in which the Commission must process this case will not commence until the above-mentioned required information is filed with the Commission. You are requested to file this information within 10 days of the date of this letter.

If you need further assistance, please contact my staff at 502-564-3940.

Sincerely,



Talina R. Mathews
Executive Director

Attachment

BILLING ANALYSIS - DECLINING BLOCK RATES
INSTRUCTIONS

The billing analysis is the chart reflecting the usage by the customers as well as the revenue generated by a specific level of rates. A billing analysis of both the current and proposed rates is mandatory for analysis of this rate filing. The following is a step-by-step description which may be used to complete the billing analysis. A completed sample of a billing analysis is also included. Although the sample reflects water usage, it is equally applicable for gas companies using declining block rate design. This billing analysis is not intended for companies using a flat rate design.

a. Usage Table (Usage by Rate Increment)

Information needed to complete the usage table should be obtained from the meter books or other available usage records. The usage table is used to spread total usage into the proper incremental rate step.

Column No. 1 is the incremental steps in the present or proposed rate schedule for which the analysis is being made. Column No. 2 is the number of bills in each incremental rate step. Column No. 3 is the total gallons used in each incremental rate step. Column Nos. 4, 5, 6, 7, 8, and 9 are labeled to correspond to the incremental rate steps shown in Column No. 1 and contain the actual number of gallons used in each incremental rate step.

Example for completing Usage Table is as follows:

Column No. 1 is incremental rate steps.

Columns numbered 2 and 3 are completed by using information obtained from usage records.

Columns numbered 4, 5, 6, 7, 8, and 9 are completed by the following steps:

Step 1: 1st 2,000 gallons minimum bill rate level

432 Bills

518,400 gallons used

All bills use 2,000 gallons or less, therefore, all usage is recorded in Column 4.

Step 2: Next 3,000 gallons rate level

1,735 Bills

4,858,000 gallons used

1st 2,000 minimum x 1,735 bills = 3,470,000 gallons - record in Column 4.

Next 3,000 gallons - remainder of water over 2,000 = 1,388,000 gallons - record in Column 5.

Step 3: Next 10,000 gallons rate level

1,830 Bills

16,268,700 gallons used

1st 2,000 minimum x 1,830 bills = 3,660,000 gallons - record in Column 4.

Next 3,000 gallons x 1,830 bills = 5,490,000 gallons - record in Column 5.

Next 10,000 gallons - remainder of water over 3,000 = 7,118,700 gallons - record in Column 6.

Step 4: Next 25,000 gallons rate level

650 Bills

15,275,000 gallons used

1st 2,000 minimum x 650 bills = 1,300,000 gallons - record in Column 4.

Next 3,000 gallons x 650 bills = 1,950,000 gallons - record in Column 5.

Next 10,000 gallons x 650 bills = 6,500,000 gallons - record in Column 6.

Next 25,000 gallons - remainder of water over 10,000 = 5,525,000 gallons - record in Column 7.

Step 5: Over 40,000 gallons rate level

153 Bills

9,975,600 gallons used

1st 2,000 minimum x 153 bills = 306,000 gallons - record in Column 4.

Next 3,000 gallons x 153 bills = 459,000 gallons - record in Column 5.

Next 10,000 gallons x 153 bills = 1,530,000 gallons - record in Column 6.

Next 25,000 gallons x 153 bills = 3,825,000 gallons - record in Column 7.

Over 40,000 gallons - remainder of water over 25,000 = 3,855,600 gallons - record in Column 8.

Step 6: Total each column for transfer to Revenue Table.

b. Revenue Table (Revenue by Rate Increment)

The Revenue Table is used to determine the revenue produced from the Usage Table. Column No. 1 is the incremental rate steps in the rate schedule for which the analysis is being made. Column No. 2 indicates the total number of bills. Column No. 3 is the number of gallons accumulated in each rate increment (Totals from Columns 4, 5, 6, 7, and 8 of the above usage table). Column No. 4 is the rates to be used in determining revenue. Column No. 5 contains the revenue produced.

Revenue from Present/Proposed Rates
 Test Period from 01-01-XX to 12-31-XX

USAGE TABLE
Usage by Rate Increment

Class: Residential

(1)	(2) Bills	(3) Gallons/Mcf	(4) First 2,000	(5) Next 3,000	(6) Next 10,000	(7) Next 25,000	(8) Over 40,000	(9) Total
First 2,000 Minimum Bill	432	518,400	518,400					518,400
Next 3,000 Gallons	1,735	4,858,000	3,470,000	1,388,000				4,858,000
Next 10,000 Gallons	1,830	16,268,700	3,660,000	5,490,000	7,118,700			16,268,700
Next 25,000 Gallons	650	15,275,000	1,300,000	1,950,000	6,500,000	5,525,000		15,275,000
Over 40,000 Gallons	153	9,975,600	306,000	459,000	1,530,000	3,825,000	3,855,600	9,975,600
Totals	4,800	46,895,700	9,254,400	9,287,000	15,148,700	9,350,000	3,855,600	46,895,700

REVENUE TABLE
Revenue by Rate Increment

(1)	(2) Bills	(3) Gallons/Mcf	(4) Rates	(5) Revenue
First 2,000 Minimum Bill	4,800	9,254,400	\$5.00 Minimum Bill	\$24,000.00
Next 3,000 Gallons		9,287,000	\$2.50 per 1,000 Gal.	\$23,217.00
Next 10,000 Gallons		15,148,700	\$2.00 per 1,000 Gal.	\$30,297.40
Next 25,000 Gallons		9,350,000	\$1.25 per 1,000 Gal.	\$11,687.50
Over 40,000 Gallons		3,855,600	\$0.75 per 1,000 Gal.	\$2,891.70
Totals	4,800	46,895,700		\$92,094.10

Instructions for Completing Revenue Table:

- (9) Complete Columns No. 1, 2, and 3 using information from Usage Tables.
- (10) Complete Column No. 4 using rates either present or proposed.
- (11) Column No. 5 is completed by first multiplying the bills times the minimum charge. Then, starting with the second rate increment, multiply Column No. 3 by Column No. 4 and total.

Revenue from Present/Proposed Rates
 Test Period from 01-01- to 12-31-

USAGE TABLE
Usage by Rate Increment

Class: _____

(1)	(2) Bills	(3) Gallons/Mcf	(4)	(5)	(6)	(7)	(8)	(9) Total
Totals								

REVENUE TABLE
Revenue by Rate Increment

(1)	(2) Bills	(3) Gallons/Mcf	(4) Rates	(5) Revenue
Totals				

Instructions for Completing Revenue Table:

- (9) Complete Columns No. 1, 2, and 3 using information from Usage Tables.
- (10) Complete Column No. 4 using rates either present or proposed.
- (11) Column No. 5 is completed by first multiplying the bills times the minimum charge. Then, starting with the second rate increment, multiply Column No. 3 by Column No. 4 and total.

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