

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CITY OF LIBERTY GAS COMPANY	)	
_____	)	
ALLEGED FAILURE TO COMPLY WITH KRS	)	CASE NO.
278.495 AND 49 C.F.R. PART 192	)	2017-00053
	)	
	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
CITY OF LIBERTY

The City of Liberty ("Liberty"), 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 within ten days of 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.

Liberty 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 Liberty fails or refuses to furnish all or part of the requested information, Liberty 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 paper containing personal information, Liberty shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide copies of Liberty's annual audited financial statements, prepared pursuant to KRS 91A.040, for fiscal years 2014, 2015, and 2016.

2. Provide copies of Liberty's annual Uniform Financial Information Report, prepared pursuant to KRS 65.905, for fiscal years 2014, 2015, and 2016.

3. Provide a copy of the organizational chart for Liberty's gas operations.

4. Refer to Liberty's Response filed March 7, 2017 ("Response"), pages 1–2. Provide the names, titles, and job duties for the five full-time employees who provide maintenance for Liberty's gas operations, and provide the name and job duties for the director or superintendent of Liberty's gas operations, if he or she is not one of the five full-time employees referenced above.

5. Provide the name, title, and job duty of each employee responsible for ensuring the compliance of Liberty's gas operations with leakage survey requirements.

6. Refer to the Response, page 2, footnote 1. Explain why Liberty states that it is possible that Ronnie Wesley, the then-lead operator, performed leakage surveys for Liberty's gas operations prior to his death in 2014.

7. Refer to the Response, page 2, footnote 1, in which Liberty states "The City has reports of regular patrols of the gas system, which are designed to locate leaks." In its response to data requests contained in an appendix to an Order entered December 1, 2016, in Case No. 2016-00391, Liberty stated, "No instruments were used during their patrolling" in regard to patrols conducted by employees of Liberty's gas operations in 2012 through 2014. Explain why Liberty states that regular patrols are designed to locate leaks and how any leaks are detected if no instruments are used during the patrols.

8. Refer to the Response, page 3. Provide a copy of Liberty's contract with Heath Consultants, Inc. to perform leakage surveys in 2017.

9. Refer to the Response, page 3. Provide documentation of the "extra steps" Liberty has taken to ensure compliance with federal leakage survey requirements and identify who is responsible for acting upon each step.

10. Explain how the budget is determined for Liberty's gas operations, including, but not limited to, whether Liberty's budget is based upon revenues derived from the gas operation.



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Public Service Commission  
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DATED MAR 10 2017

cc: Parties of Record

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