

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
CASE #: 2017-00120

RECEIVED

AUG 23 2017

PUBLIC SERVICE
COMMISSION

IN RE:

BASIL C. POLLITT, INDIVIDUALLY
D/B/A THE GAS GROUP, INC.
A/K/A THE GAS GROUP.

**RESPONSE TO POST HEARING DATA REQUESTS
OF ATTORNEY GENERAL, OFFICE OF RATE INTERVENTION**

Come the Respondents, The Gas Group and Basil Pollitt, by counsel, and in response to the Post Hearing Data Requests of the Attorney General, Office of Rate Intervention, state as follows:

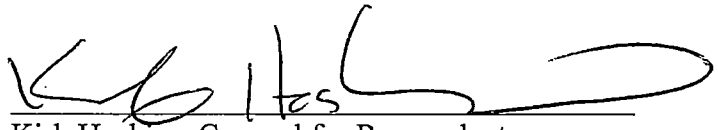
OBJECTIONS: Respondents object to the Post Hearing Data Requests in that same are not timely. Moreover the requests are not authorized by statute, regulation or the rules of civil procedure. Respondents further object on the basis that the Attorney General (Office of Rate Intervention) is not a proper party to this proceeding. Finally, the Data Requests are unauthorized inasmuch as same are predicated upon Respondents' status as a public utility which they deny. Subject to these objections but without waiving same Respondents respond as follows:

1. Provide a letter, license, correspondence or any other document from the Kentucky Division of Oil and Gas, or any other state agency, which evidences that Pollitt Enterprises has an active Gathering Line Operator permit and that all request fees for such permit are current.

RESPONSE: OBJECTION—The Attorney General, Office of Rate Intervention, lacks authority/standing to request the documents described in the Request. Subject to this objection but without waiving same see Ex. A, attached.

2. Provide the image of the back of a check made out to the Gas Group, which clearly shows the signature of the person or entity which endorses such checks.

RESPONSE: OBJECTION—The Attorney General, Office of Rate Intervention, lacks authority/standing to request the documents described in the Request. Subject to this objection but without waiving same see Ex. B, attached. Respondents are unable to obtain the reverse side of the check but do provide the deposit slip. Moreover, PSC has sought the reverse side of the check from Jason Sharp of Souther Kentucky Energy and verily believes he will produce same.



Kirk Hoskins, Counsel for Respondents
The Landward House
1387 S. Fourth Street
Louisville, KY 40208
502-821-9001-Office
502-634-9119-Fax
Hoskins@Kirk.win.net (E-mail)

CERTIFICATE OF SERVICE

It is hereby certified that an original and 10 copies of this Response was sent via U.S. Mail to the Public Service Commission, P.O. Box 615, 211 Sower Blvd. Frankfort, KY 40602-0615 this 21st day of August, 2017. It is hereby further certified that a copy of this Response was mailed to the Office of Attorney General, c/o Kent Chandler/Rebecca Goodman/Justin McNeil, Assistant Attorney General, Office of Rate Intervention, 700 Capital Avenue, Suite 20, Frankfort, KY 40601 and Nancy Vinsel, Counsel for the PSC, 211 Sower Blvd. Frankfort, KY, 40601-0615 this 21st day of August, 2017.



VERIFICATION

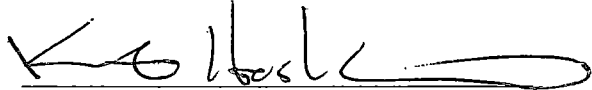
I, Basil Pollitt, do hereby affirm that the responses to the Post Hearing Date Requests set forth herein are true and accurate to the best of my knowledge and belief.



Basil Pollitt

County of Jefferson)
)
Commonwealth of Kentucky)

Acknowledged, subscribed and sworn to before me by Basil Pollitt this 21st day of August, 2017.



Notary Public, State at Large

12-10-20

Commission Expiration

EXHIBIT A

409
Division of Oil & Gas
P.O. Box 2244
Frankfort, KY 40602
502-573-0147



\$ 00.35

Gathering Line Operator License Renewal - 2016 Amount Due
\$100.00

Failure to pay will result in violations and possible bond forfeiture.
Please include your operator number with your payment.
Make checks payable to: Kentucky State Treasurer
Payment is due February 15, 2016

We will no longer mail out approval letters.
This invoice and your check are your receipt.

OP# 184556

POLLITT ENTERPRISES INC
12004 RIDGE RD

LOUISVILLE, KY 40223

VOID AFTER 90 DAYS - DO NOT USE SECURITY FEATURES OF THE PAPER

POLLITT ENTERPRISES INC.
13517 Saddlecreek Drive
Louisville KY 40245-1967

Check No. 3515

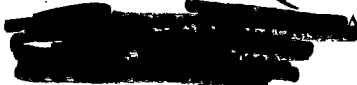
Date 2/15/16

Pay to the Order of

Kentucky State Treasurer
One hundred and 00/100

\$ 100.00

DOLLARS



Ball [Signature]

Void after 90 Days

Memo

#184556 operator #

409
Division of Oil & Gas
P.O. Box 2244
Frankfort, KY 40602
502-573-0147



UNITED STATES POSTAGE
\$ 00.35
0004261733 JAN 04 2016
MAILED FROM ZIP CODE 40601

Gathering Line Operator License Renewal - 2016 Amount Due
\$100.00

Failure to pay will result in violations and possible bond forfeiture.
Please include your operator number with your payment.
Make checks payable to: Kentucky State Treasurer
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OP# 184556

POLLITT ENTERPRISES INC
12004 RIDGE RD

LOUISVILLE, KY 40223

15

EXHIBIT B

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

1942



SOUTHERN KENTUCKY ENERGY, LLC

425 POWER STREET
BOWLING GREEN, KY 42101-5140

American Bank & Trust
Traditional Banking at Its Best

06/01/2017

PAY TO THE ORDER OF

The Gas Group

\$ **4,078.68

DOLLARS

Four thousand seventy-eight and 68/100*****

The Gas Group

AUTHORIZED SIGNATURE

MEMO

THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE. RECORD IMAGE DISAPPEARS WITH HEAT.

SOUTHERN KENTUCKY ENERGY, LLC

1942

06/01/2017

The Gas Group

Rental on Pipeline - May 2017

4,078.68

SoKY Energy (4001)

4,078.68

