

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 PSC

Come the Respondents, The Gas Group and Basil Pollitt, by counsel, and in response to the Post Hearing Data Requests of PSC 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. 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 the monthly sales volumes sold between January 2012 and July 2017 to the "farm tap" customers served by the Pollitt natural gas pipeline that is the subject of this action.

RESPONSE: See Ex. A, attached.

2. Provide monthly sales volumes sold between October 2006 and January 2017 to wholesale customers served by the Pollitt natural gas pipeline that is the subject of this action.

RESPONSE: See Ex. B, attached which contains sales volumes for the year November of '15 thru November of '16. Respondents have no sales volume records prior to this time frame.

3. Provide a copy of all invoices issued to Southern Kentucky Energy, LLC, since January 2017.

RESPONSE: Respondent has no document responsive to this request. Southern Kentucky Energy reads the meter(s) at the northern and southern ends of the well and pays per the meter reading.

4. Provide a financial statement for the fiscal year October 2015 to October 2016. The financial statement should provide: total revenues, broken out by income category; total expenses, broken out by expense category; net income or losses; and any below the line income or expenses for the Pollitt natural gas pipeline that is the subject of this action.

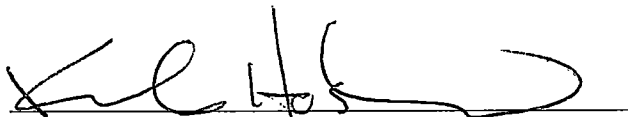
RESPONSE: See Ex. C, attached.

5. Provide records of leakage surveys and patrol reports from January 2011 through July 2017 conducted on the Pollitt natural gas pipeline that is the subject of this action.

RESPONSE: See Ex. D, attached.

6. Provide a copy of any document, including but not limited to contracts invoices or billings, evidencing service provided to Viking Energy by the Pollitt natural gas pipeline that is the subject of this action.

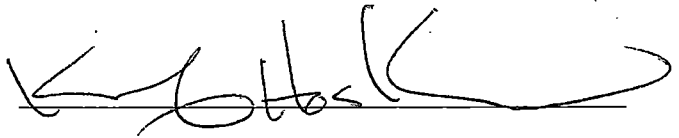
RESPONSE: The only document Respondents are able to locate responsive to this request is the unsigned contract with Viking Energy attached as Ex. E.



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)

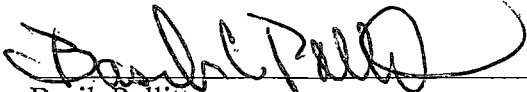
CERTIFICATE OF SERVICE

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.

A handwritten signature in black ink, appearing to be "K. Stok", written over a horizontal line.


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



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

Gas Sales

	2012	2013	2014	2015	2016	2017
January	235	340	268	370	216	306
February	388	360	558	458	233	
March	348	381	397	387	331	
April	255	104	179	85	86	
May						
October						
November	208	196	168	155	130	
December	322	231	263	154	318	

EXHIBIT B



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

Wholesale Gas Sales 2017

March 2017 Not Reported

April 233.4 MCF

May 217.6 MCF

June 305.1 MCF

July 465.5 MCF

EXHIBIT C



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

Gas Group Expenses & Income November 2015 To November 2016

Income:

November \$1599.00
December \$1940.00
January \$2566.00
February \$2557.00
March \$1174.00
April \$1392.00

Gross: \$11,222.00

Expense:

Line Maintance \$4505.00
Telephone and Insurance \$7,705.00
Mileage \$9440.00
Depreciation Car \$4000.00
Gas and Other expenses \$4246.00

Total \$29,896.00
Less Income -\$11222.00
Net Loss (\$18674.00)

EXHIBIT D



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

As noted in prior statements; we check on a monthly basis for leaks near and around meters, and in yards, watch for construction daily. We have a representative to respond in the area and he travels to and from Bowling Green along Hwy 185 on most days watching for construction and other events that may affect our line. We respond to calls for line marking promptly and are well known in the area. We have a clean safety record and maintain a good repport with our customer base.



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

Conducted By: Basil C Pollitt 13517 Saddlecreek Drive
Louisville, Kentucky 40245

December 5-8 2011 Gas Detecting Instrument TIF 8800 Used

Day 1: Area Covered Runner Farm Well, to Ray Keown Farm across Pruitt Road up behind Martin Farm to Hwy 185 to Hwy 1320 to Anna Sandhill Road. Valves checked opened and closed Drips drained, line pressure noted 50 psi. No signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted going on in area.

Day 2: Anna Sandhill Road to Lake Road to Green River. No Signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted in the area. Valve checked closed and reopened, drips drained and line pressure checked

Day 3: Green River North to Roundhill Kentucky cross roads. No Signs of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area, Valves checked Drips emptied Line pressure remained the same.

Day 4: Roundhill North on Hwy 185 to Grayson County line. No Sign of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area. Valves checked closed and reopened two drips were drained. line pressure remain contant.



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

**Conducted By: Basil C Pollitt 13517 Saddlecreek Drive
Louisville, Kentucky 40245**

December 3-6 2012 Gas Detecting Instrument TIF 8800 Used

Day 1: Area Covered Runner Farm Well, to Ray Keown Farm across Pruitt Road up behind Martin Farm to Hwy 185 to Hwy 1320 to Anna Sandhill Road. Valves checked opened and closed Drips drained, line pressure noted 47 psi. No signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted going on in area.

Day 2: Anna Sandhill Road to Lake Road to Green River. No Signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted in the area. Valve checked closed and reopened, drips drained and line pressure checked

Day 3: Green River North to Roundhill Kentucky cross roads. No Signs of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area, Valves checked Drips emptied Line pressure remained the same.

Day 4: Roundhill North on Hwy 185 to Grayson County line. No Sign of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area. Valves checked closed and reopened two drips were drained. line pressure remain contant.



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

**Conducted By: Basil C Pollitt 13517 Saddlecreek Drive
Louisville, Kentucky 40245**

December 2-5 2013 Gas Detecting Instrument TIF 8800 Used

**Day 1: Area Covered Runner Farm Well, to Ray Keown Farm across
Pruitt Road up behind Martin Farm to Hwy 185 to Hwy 1320 to Anna
Sandhill Road. Valves checked opened and closed Drips drained, line
pressure noted 51 psi. No signs of Gas Leakage, TIF 8800 alarm did
not sound, No construction noted going on in area.**

**Day 2: Anna Sandhill Road to Lake Road to Green River.
No Signs of Gas Leakage, TIF 8800 alarm did not sound, No
construction noted in the area. Valve checked closed and reopened,
drips drained and line pressure checked**

**Day 3: Green River North to Roundhill Kentucky cross roads.
No Signs of Gas Leakage, TIF 8800 alarm did not sound. No
construction noted in area, Valves checked Drips emptied Line
pressure remained the same.**

**Day 4: Roundhill North on Hwy 185 to Grayson County line.
No Sign of Gas Leakage, TIF 8800 alarm did not sound. No
construction noted in area. Valves checked closed and reopened two
drips were drained. line pressure remain constant.**



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

Conducted By: Basil C Pollitt 13517 Saddlecreek Drive
Louisville, Kentucky 40245

December 8-12 2014 Gas Detecting Instrument TIF 8800 Used

Day 1: Area Covered Runner Farm Well, to Ray Keown Farm across Pruitt Road up behind Martin Farm to Hwy 185 to Hwy 1320 to Anna Sandhill Road. Valves checked opened and closed Drips drained, line pressure noted 45 psi. No signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted going on in area.

Day 2: Anna Sandhill Road to Lake Road to Green River.
No Signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted in the area. Valve checked closed and reopened, drips drained and line pressure checked

Day 3: Green River North to Roundhill Kentucky cross roads.
No Signs of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area, Valves checked Drips emptied Line pressure remained the same.

Day 4: Roundhill North on Hwy 185 to Grayson County line.
No Sign of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area. Valves checked closed and reopened two drips were drained. line pressure remain constant.



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

Conducted By: Basil C Pollitt 13517 Saddlecreek Drive
Louisville, Kentucky 40245

December 7-11 2015 Gas Detecting Instrument TIF 8800 Used

Day 1: Area Covered Runner Farm Well, to Ray Keown Farm across Pruitt Road up behind Martin Farm to Hwy 185 to Hwy 1320 to Anna Sandhill Road. Valves checked opened and closed Drips drained, line pressure noted 53 psi. No signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted going on in area.

Day 2: Anna Sandhill Road to Lake Road to Green River.
No Signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted in the area. Valve checked closed and reopened, drips drained and line pressure checked

Day 3: Green River North to Roundhill Kentucky cross roads.
No Signs of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area, Valves checked Drips emptied Line pressure remained the same.

Day 4: Roundhill North on Hwy 185 to Grayson County line.
No Sign of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area. Valves checked closed and reopened two drips were drained. line pressure remain constant.



The Gas Group

Basil Pollitt | President and CEO | 270-303-9236

13517 Saddlecreek Drive | Louisville, KY 40245 | thegasgroupinc@yahoo.com

Conducted By: Basil C Pollitt 13517 Saddlecreek Drive
Louisville, Kentucky 40245

December 5-9 2016 Gas Detecting Instrument TIF 8800 Used

Day 1: Area Covered Runner Farm Well, to Ray Keown Farm across Pruitt Road up behind Martin Farm to Hwy 185 to Hwy 1320 to Anna Sandhill Road. Valves checked opened and closed Drips drained, line pressure noted 46 psi. No signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted going on in area.

Day 2: Anna Sandhill Road to Lake Road to Green River. No Signs of Gas Leakage, TIF 8800 alarm did not sound, No construction noted in the area. Valve checked closed and reopened, drips drained and line pressure checked

Day 3: Green River North to Roundhill Kentucky cross roads. No Signs of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area, Valves checked Drips emptied Line pressure remained the same.

Day 4: Roundhill North on Hwy 185 to Grayson County line. No Sign of Gas Leakage, TIF 8800 alarm did not sound. No construction noted in area. Valves checked closed and reopened two drips were drained. line pressure remain constant.

EXHIBIT E



VIKING ENERGY, LLC
425 Power Street, Bowling Green, KY 42101
Phone: (270) 842-9035, Fax: (270) 796-9130

PIPELINE AND METER-RUN CONSTRUCTION CONTRACT

This agreement made this ____ day of June 2007, by and between, of **THE GAS GROUP, BASIL POLLITT**, Chief Operating Officer herein referred to as "Gas Group" located at 102 Old Bond Court, #2 Louisville, Kentucky 4022 and **VIKING ENERGY LLC, MIKE PARSLEY**, Chief Operating Manager located at 425 Power Street, Bowling Green KY 42101 herein referred to as "Viking".

Gas Group and Viking in consideration for the Natural Gas Purchase Contract between the parties herein and the mutual covenants hereinafter set forth the parties herein agree as follows:

SECTION ONE STRUCTURE AND SITE

Viking shall furnish all labor and materials necessary to construct a natural gas pipeline and interconnect between Gas Group's four inch line and Viking's six inch main line, upon the following described property, which Gas Group will supply at its cost the necessary easement and agreements to place the pipeline, meter-run and interconnect upon the Ray Keown Property located on Pruitt Road, Warren County KY and will consist of trenching and installing a section of four-inch poly pipeline approximately 1,000 feet in total length. Said interconnect will include but not necessarily be limited to, in addition to the trenching, the following materials; 1,000 feet of four-inch SDR 11 polyethylene gas line, interconnect fittings, fusing, valves, checks, four-inch meter-run, meter (Total Flow Meter- exact meter to be agreed upon by Gas Group) and anything else (within reason and agreed to in advance by the Gas Group) necessary to complete the interconnect between the Gas Group's four-inch and Viking's six-inch lines trunk lines.

SECTION TWO PLANS

Viking shall construct the pipeline, meter-run and interconnect in conformance with the plans, specifications, and design of Viking, and will do so in a workmanlike manner. Viking is not responsible for furnishing any improvements other than those listed herein, unless they are specifically stated in writing and agreed to by both parties.

of pipeline, meter-run and interconnect taken by Gas Group shall be considered as acceptance, by the Gas Group, and delivered as complete and satisfactory.

SECTION SIX

LIABILITIES

The liability of the parties herein shall be several, not joint or collective. Each party shall be responsible only for its obligations, and shall be liable only for its proportionate share of the costs and materials identified herein. It is not the intention of the parties to create, nor shall this agreement be construed as creating, a union or other partnership or association, or to render the parties liable as partners.

SECTION SEVEN

ATTORNEY FEES

In the event legal action becomes necessary to enforce the terms of this agreement the prevailing party shall recover legal costs and reasonable attorney's fees.

SECTION EIGHT

GENERAL PROVISIONS

There are no understandings or agreements between Viking and Gas Group other than those set forth in this agreement. No other statement, representation or promise has been made to induce either party to enter into this agreement. This agreement may not be modified or amended except by written agreement of the parties.

In witness whereof, the parties have executed this agreement the day and year first written above.

The Gas Group

Viking Energy LLC