

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                    |   |            |
|------------------------------------|---|------------|
| PHILIP W. WHITLEY                  | ) |            |
|                                    | ) |            |
| COMPLAINANT                        | ) |            |
|                                    | ) |            |
| V.                                 | ) | CASE NO.   |
|                                    | ) | 2023-00052 |
| NATURAL ENERGY UTILITY CORPORATION | ) |            |
|                                    | ) |            |
| DEFENDANT                          | ) |            |

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO NATURAL ENERGY UTILITY CORPORATION

Natural Energy Utility Corporation (NEUC), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on July 26, 2023. The Commission directs NEUC to the Commission's July 22, 2021 Order in Case No. 2020-000851<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission mandated electronic filing, with exception to *pro se* formal complaints filed against utilities).

governmental agency, be accompanied by a signed certification of the preparer or the 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.

NEUC shall make timely amendment to any prior response if NEUC obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which NEUC fails or refuses to furnish all or part of the requested information, NEUC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, NEUC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

A copy of this request shall be served on Phillip W. Whitley by U.S. certified mail, return receipt requested, at 14402 Deerhaven Court, Rush, Kentucky 41102.

1. Refer to NEUC's response to Commission Staff's First Request for Information, Item 2. Provide the basis for the requirement given in the initial estimate requiring that all three customers "sign up" or apply for the line extension.

2. Refer to NEUC's response to Commission Staff's First Request for Information, Item 2. Provide a copy of the blank application described in this response as required for a formal estimate to be received.

3. Refer to NEUC's response to Commission Staff's First Request for Information, Item 3. Provide a copy of the applications received from the three customers for the line extension in October and November of 2022. Refer to NEUC's response to Commission Staff's First Request for Information, Item 4. Provide a diagram of the proposed route for the line extension to the three customers, including but not limited to the following:

- a. The location of the three houses requesting service;
- b. The path of the proposed line extension; and
- c. The footage of the proposed line extension.

4. Refer to NEUC's response to Commission Staff's First Request for Information, Item 5. Provide the current cost to install an extension in excess of 100 feet from NEUC's nearest gas main to Mr. Whitley's property in Rush, Kentucky, with the use of contractors as opposed to NEUC doing all work. Include a detailed itemized estimate.

5. Refer to NEUC's response to Commission Staff's First Request for Information, Item 6. Provide detailed information regarding any of the 35 service line extensions that occurred within the last 12 months, including but not limited to the following:

- a. The length of the extension;
- b. The cost estimate provided for the extension; and
- c. The final cost of the extension.

A handwritten signature in blue ink, appearing to read "Linda C. Bridwell", is written over a horizontal line. To the right of the signature, the letters "F&L" are written in blue ink.

Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED JUN 16 2023 \_\_\_\_\_

cc: Parties of Record

Case No. 2023-00052

Philip W. Whitley  
14402 Deerhaven Court  
Rush, KENTUCKY 41168

\*Natural Energy Utility Corporation  
2560 Hoods Creek Pike  
Ashland, KY 41102

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