

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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

Natural Energy Utility Corporation (NEUC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 15, 2023. The Commission directs NEUC to the Commission's July 22, 2021 Order in Case No. 2020-000851¹ 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

¹ 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 Philip 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 Second Request for Information (Staff's Second Request), Item 4. Provide a detailed estimate to install the

requested extension from NEUC's nearest gas main to Mr. Whitley's property in Rush, Kentucky, specific to Mr. Whitley's extension. Estimate should include, but is not limited to:

- a. Location of work being to be performed;
- b. Description of work to be performed, including length of extension;
- c. Itemized list of materials required for work;
- d. Itemized list of cost for necessary materials; and
- e. Cost of labor for work to be performed.

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

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

3. State whether NEUC proposes to charge all three customers for the full cost of the main line extension required to serve their three properties. If not, provide an itemized list of the cost of each applicant's extension and explain how the cost of the shared line would be allocated to each.

4. Explain whether NEUC is providing up to 100 feet of an extension to its existing distribution mains without charge. If so, explain the installation fee of \$650 to lay

new service of under 150 feet on NEUC's application provided in response to Item 2 of Staff's Second Request.

5. Refer to the Application for service provided and refer to NEUC's response to Staff's Second Request, Item 2.

a. State whether the \$150 tap fee for new service is included in NEUC's tariff. If not, state how long NEUC has been charging this fee and by what authority.

b. State whether the deposit amount of \$180 is included in NEUC's tariff. If not, state how long NEUC has been charging this deposit amount and how it was calculated.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED AUG 17 2023

cc: Parties of Record

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