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300 WEST VINE STREET | SUITE 2100 | LEXINGTON, KENTUCKY 40507-1801 (859) 231-3000 PHONE | (859) 253-1093 FAX | WWW.SKP.COM

&

ROBERT M. WATT, III 859-231-3043 watt@skp.com

April 15, 2005

Case 2005-00160

RECEIVED

APR 1 5 2005

PUBLIC SERVICE

COMMISSION

Hon. Beth A. O'Donnell Executive Director Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40601

> Re: Equitable Production Company Request for Adjustment of Rates

Dear Ms. O'Donnell:

We submit herewith for filing an original and ten copies of the information, including the proposed tariff sheets, submitted in connection with the request of Equitable Production Company (hereinafter "EPC" or the "Company") to adjust rates effective June 14, 2005, pursuant to KRS 278.485 and 807 KAR 5:026, Section 9. The rates of EPC have not been adjusted since December of 2003. The proposed rate adjustment relates only to the gas cost portion of the rates of EPC. The proposed rate increase is a 33.47% change in rates as compared to a 7.15% increase in the Producer Price Index for Residential Natural Gas for the 12 months ended December 31, 2004. The proposed rate does not exceed the highest average volumetric rate of a local gas distribution utility approved by the Commission and in effect on this date. Please note that EPC also proposes the implementation of a Gas Cost Adjustment Clause in this request to reflect the cost of third-party production that the Company purchases to serve its residential customers in and near Pikeville, Kentucky.

Sincerely,

Robert a Tam

Robert M. Watt, III

Rmw

Hon Beth A. O'Donnell April 15, 2005 Page 2

Encl.

Cc: Daniel L. Frutchey, Esq. (w/encl.) Sandra Fraley, Esq. (w/encl.) Mr. John M. Quinn (w/encl.)

EQUITABLE PRODUCTION COMPANY

RECEIVED

APR 1 5 2005

Before the

PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

of

KENTUCKY

Information submitted in connection with a request to adjust rates effective April, 2005

Issued: April 15, 2005

Effective: June 14, 2005

Equitable Production Company

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for the Twelve months Ended December 2004

Filing Requirements: Test of percentage change in rates vs. percentage change in price index

Pursuant to 807 KAR 5:026:

Section 9. Rates and Charges.

(1)(a)1A gas company which provides service pursuant to KRS 278.485 may request an adjustment in rates through a proposed tariff submitted at least sixty (60) days prior to its proposed effective date if:

1. The percentage change in rates does not exceed the percentage change in the price index during the most recent twelve (12) month period immediately preceding the date the proposed tariff is filed; and

Response:

The increase in the Producer Price Index for Residential Natural Gas as provided by the commission is 7.15%

Percentage change in EPC rates proposed in this filing:

	quested crease		Supported Increase		
Average monthly consumption	 <u>7.6</u> Mc	f	7.6 Mcf		
Average monthly bill at current rates	\$ 48.59	\$	48.59		
Average monthly bill	\$ 64.86	\$	83.73		
Average increase	\$ 16.27	\$	35.14		
Percentage change in rates	 33.49%		72.32%		

Filing Requirements Test of proposed rate vs. highest rate approved by the Commission

KRS 278.485 Section 9. Rates and Charges.

(1)(a)2. The proposed rate does not exceed the highest average volumetric rate of a local gas distribution utility approved by the commission and in effect on the date the proposed tariff is filed. The commission shall provide the current percentage change in the price index and the highest prevailing rate upon written request.

Response:

Equitable's proposed rate =

\$ 8.5340

RATES AS OF OCTOBER 2004

Utility	Base	Gas	Total Vol.
Name	Rate	Cost	Rate
Atmos	\$1.1900	\$8.2896	\$9.4796
Auxier Road	\$4.2599	\$7.1431	\$11.4030
B & H Gas	\$1.9788	\$6.0000	\$7.9788
Belfry Gas	\$2.7182	\$7.8289	\$10.5471
Bluegrass Gas	\$4.6137	\$8.3714	\$12.9851
Burkesville Gas	\$4.2500	\$9.1444	\$13.3944
Citipower	\$6.4592	\$7.6485	\$14.1077
Columbia	\$1.8715	\$8.2155	\$10.0870
Delta	\$3.6224	\$8.3941	\$12.0165
East Kentucky Utilities	NA	\$7.0902	\$10.4992
Elam Gas	\$4.2999	\$6.9022	\$11.2021
Equitable Gas	\$2.1322	\$10.4331	\$12.5653
Gasco	\$4.6200	\$8.6075	\$13.2275
Jefferson Gas	\$2.2600	\$5.3627	\$7.6227
Johnson County	\$5.9542	\$8.3500	\$14.3042
LG&E	\$1.3457	\$8.4857	\$9.8314
Martin Gas	NA	\$5.1186	\$10.7737
Mike Little	\$4.3271	\$10.5420	\$14.8691
Millennium	\$4.0000	\$6.5141	\$10.5141
Natural Energy Utility	\$4.2400	\$6.3355	\$10.5755
People's Gas	\$2.7670	\$10.4980	\$13.2650
Public Gas	\$2.1505	\$8.2230	\$10.3735
Sentra	\$2.1440	\$3.9764	\$6.1204
Sigma Gas	\$4.5522	\$7.5007	\$12.0529
ULH&P	\$2.3340	\$6.0350	\$8.3690
Valley Gas, Inc.	\$2.3819	\$4.7428	\$7.1247
Western Lewis Rectorville	\$1.3970	\$7.5606	\$8.9576
Average Rate	\$3.2748	\$7.5301	\$10.9727
Maximum Rate	\$6.4592	\$10.5420	\$14.8691

\$1.1900

\$3.9764

\$6.1204

Minimum Rate

Schedule B

Equitable Production Company - Pikeville, Ky Division

Filing Requirements: Cost Data

Pursuant to 807 KAR 5:026:

KRS 278.485 Section 9. Rates and Charges. (1) Rates (b) If the proposed percentage increase in rates exceeds the percentage change in the price index but the proposed rate remains below the highest prevailing gas rate approved by the commission, the gas company shall submit, with its proposed tariff, cost data which support the proposed increase. The data shall include the gas company's costs to provide the service during each of the previous two (2) years and shall be current within ninety (90) days of the date the proposed tariff is filed.

Response:

Attached is a two year history of the Columbia Gas Transmission Co. Appalachia index which supports the market price of natural gas. This schedule does not include non-gas costs of service.

	TC Appal Index	achia	Btu Factor (2)		te Per Mcf ≔1*2)	Purchase Volumes Mcf (4)	R	evenue (5)	Av	ighted erage (6)	
Jan-03	¢	5.12	1.174	\$	6.01	19,881	\$	119,502			
Feb-03	Ψ	5.95		Ψ	6.99	58,425	Ψ	408,116			
Mar-03		9.39			11.02	21,453		236,495			
Apr-03		5.43	1.174		6.37	(535)		(3,411)			
May-03		5.53			6.49	13,383		86,885			
Jun-03		6.31			7.41	(3,007)		(22,276)			
Jul-03		5.59			6.56	3,105		20,377			
Aug-03		4.94			5.80	6,203		35,975			
Sep-03		5.13			6.02	7,178		43,230			
Oct-03		4.66			5.47	16,281		89,071			
Nov-03		4.68			5.49	13,362		73,415			
Dec-03		5.07			5,95	31,640		188,327			
Jan-04		6.34			7.44	29,451		219,209			
Feb-04		6.03			7.08	34,772		246,159			
Mar-04		5.40			6.34	26,187		166,015			
Apr-04		5.63			6.61	6,781		44,820			
May-04		6.19			7.27	7,685		55,847			
Jun-04		6.96			8.17	3,073		25,110			
Jul-04		6.42			7.54	4,582		34,535			
Aug-04		6.28	1.174		7.37	3,103		22,878			
Sep-04		5.33	1.174		6.26	7,810		48,870			
Oct-04		6.06	1.174		7.11	5,313		37,799			
Nov-04		7.89	1.174		9.26	6,124		56,726			
Dec-04		8.18	1.174		9.60	17,655		169,547			
2003 average	\$	5.65		\$	6.63						
2004 average	\$	6.39		\$	7.50						
2 year average	\$	5.91		\$	7.07	339,905	\$2	2,403,221	\$	7.07	
Current gas cost p	er Case	e No. 2	2003-00317							<u>4.93</u>	
Increase									<u>\$</u>	2.14	
Percentage increa	se									43%	

Equitable Production Company - Pikeville, Kentucky Division Schedule C

for the Twelve months Ended December 31, 2004

Present Rates approved by the Commission at Case No. 2003-00317

Service Charge	\$	-	per Customer per Month
Usage Charges (\$/Mcf) (a)			
Base rate Gas cost All Mcf	\$ \$	1.464 <u>4.93(</u> 6.394	<u>0</u>

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Schedule D

for the Twelve months Ended December 31, 2004

Proposed Rates - Effective June 14, 2005

Service Charge

\$ - per Customer per Month

Usage Charges (\$/Mcf) (a)

Base rate	1.464
Gas cost	<u>\$ 7.070</u>
All Mcf	<u>\$ 8.534</u>

Equitable Production Company - Pikeville, Kentucky Division	Schedule E

for the Twelve months Ended December 31, 2004

Supported Rates

Service Charge

\$ - per Customer per Month

Usage Charges (\$/Mcf) (a)

Base rate	1.464
Gas cost	<u>\$ 9.553</u>
All Mcf	<u>\$ 11.017</u>

Summary of Supported Gas Cost Recovery Rate

Line No.		<u>Units</u> (1)	<u>Amount</u> (2)
1 2 3 4	<u>Gas Cost Adjustment Components:</u> Expected Gas Cost (EGC) Actual Cost Adjustment (ACA) Balance Adjustment (BA) Gas cost Recovery Rate	\$/Mcf \$/Mcf \$/Mcf \$/Mcf	9.5525 0.0000 <u>\$0.0000</u> 9.5525
5 6 7	Expected Gas Cost Calculation (EGC) Total expected cost of gas Total annual sales Expected gas cost rate	\$ Mcf \$/Mcf	\$ 1,104,567 <u> </u>
8 9 10 11 12	Actual Cost Adjustment Summary Current Quarter Adjustment Previous Quarter Adjustment 2nd Previous Quarter Adjustment 3rd Previous Quarter Adjustment Actual Cost Adjustment	\$/Mcf \$/Mcf \$/Mcf \$/Mcf \$/Mcf	0.0000 0.0000 0.0000 <u>0.0000</u> <u>0.0000</u>
13 14 15 16 17	Balance Adjustment Summary Current Quarter Adjustment Previous Quarter Adjustment 2nd Previous Quarter Adjustment 3rd Previous Quarter Adjustment Balance Adjustment	\$/Mcf \$/Mcf \$/Mcf \$/Mcf \$/Mcf	\$0.0000 \$0.0000 \$0.0000 <u>\$0.0000</u> \$ <u>0.0000</u>

Calculation of Supported Gas Cost Based on Purchases for the Twelve Months Ended December 2004

	Sales Volumes (Mcf)	<u>Btu</u>	Purchases (Dth)	Average Rate (a)		Anı	nual Cost
					<u>`</u>		
January-04	21,071	1.174	24,737	\$	8.1367	\$	201,281
Feb	24,257	1.174	28,478		8.1367		231,715
Mar	18,833	1.174	22,110		8.1367		179,903
Apr	3,958	1.174	4,647		8.1367		37,809
May	5,655	1.174	6,639		8.1367		54,019
Jun	1,848	1.174	2,170		8.1367		17,653
Jul	3,066	1.174	3,599		8.1367		29,288
Aug	1,907	1.174	2,239		8.1367		18,217
Sep	5,944	1.174	6,978		8.1367		56,780
Oct	5,313	1.174	6,237		8.1367		50,753
Nov	6,124	1.174	7,190		8.1367		58,500
Dec	17,655	1.174	20,727		8.1367		168,650
Total	115,631		135,751			\$	1,104,567

(a) Estimated average rate based on three average NYMEX prices plus TCO basis and adjusted for retainage.

Summary of Supported Gas Cost Recovery Rate

NYMEX Futures @ March 16, 2005

May-05 Jun Jul Average	7.278 7.348 <u>7.403</u> 7.343
TCO Basis	0.2828
Retainage	1.067
Average rate	<u>\$ 8.1367</u>

Schedule G

Equitable Production Company - Pikeville, Ky Division

for the Twelve months Ended December 2004

Filing Requirements: Tariff

Pursuant to 807 KAR 5:026:

KRS 278.485 Section 9. Rates and Charges. 1(a) A gas company which provides service pursuant to KRS 278.485 may request an adjustment in rates through a proposed tariff submitted at least sixty (60) days prior to its proposed effective date.

Response:

Attached is the company's proposed tariff.

Original

P.S.C. Ky. No. 1

EQUITABLE PRODUCTION COMPANY

PITTSBURGH, PENNSYLVANIA

RATES FOR FURNISHING

NATURAL GAS

AT

Connections along Equitable Production Company's pipeline system in Eastern Kentucky.

FILED WITH THE PUBLIC SERVICE COMMISSION

 \mathbf{OF}

KENTUCKY

Issued by: EQUITABLE PRODUCTION COMPANY

By: Sandra Fraley Vice President and General Counsel 225 North Shore Drive Pittsburgh, Pennsylvania 15212-5861

Original Sheet No. 1 P.S.C. Ky. No. 1

RATE

Customer: Various

<u>Rate</u>:

	<u>Base Rate</u>	+	<u>Gas Cost Recovery Rate</u> *	==	<u>Total Rate</u>	
All Mcf	\$1.463		\$7.07 per MCF		\$8.534	(I)

*The "Gas Cost Recovery Rate (GCR)" as shown above, is an adjustment per Mcf determined in accordance with the "Gas Cost Adjustment Clause" as set forth on Sheet No. 2 of this tariff.

All gas sold and delivered under this Tariff shall be delivered at the varying pressures of Equitable's pipeline, and it shall be the responsibility of the customer to supply, maintain, and operate the necessary regulator and related equipment for the customer's use.

Effective: June 14, 2005

GAS COST ADJUSTMENT CLAUSE ("GCA")

Determination of the GCA

The Company shall file a quarterly report with the Public Service Commission of Kentucky ("Commission") containing an updated GCA rate. The quarterly GCA filing will be submitted thirty (30) days prior to the beginning of each calendar quarter. The GCA will become effective for billing after review and approval by the Commission.

The GCA is comprised of:

- a. The Expected Gas Cost component ("EGC"). The EGC will be calculated on a dollar per Mcf basis and represent the estimated cost of purchased gas which results from the application of the Columbia Gas Transmission Appalachian Monthly Index multiplied by projected gas purchase volumes, divided by the projected sales volumes. Where the calculations require the use of volumes used during a given period, and those volumes did not exist for a particular source for the entire period, or the Company expects the volumes to change substantially, the Company may make appropriate adjustments to its calculation. Any adjustments of this type shall be described in the quarterly Gas Cost Recovery Report.
- b. The Actual Cost Adjustment ("ACA"). The ACA will be calculated on a dollar per Mcf basis and represent any previous over or undercollection of gas costs experienced by the company through the PGA mechanism. The ACA will be calculated monthly by applying an applicable Btu conversion factor and retainage rate to the actual sales volume to determine a purchased gas volume. The monthly closing price of the Columbia Gas Transmission Appalachian Index will be multiplied by the purchased gas volume to determine actual purchased gas costs.
- c. The Balancing Adjustment ("BA") The BA will be calculated on a dollar per Mcf basis. The BA represents any remaining over or undercollection of gas costs resulting from prior billed quarterly GCAs.
- d. "Calendar Quarters" means each of the four three-month periods of (1) February, March, and April; (2) May, June, and July; (3) August, September, and October; (4) November, December, and January.
- e. "Reporting Period" means the three-month accounting period that ended approximately sixty (60) days prior to the filing date of the updated gas cost recovery rates; i.e., the calendar quarters ended April 30, July 31, October 31, and January 31 of each year.

Gas Cost Recovery Rate (GCR):

Expected Gas Supply Cost (EGC)	\$0.0000
Actual Cost Adjustment (ACA)	0.0000
Balance Adjustment (BA)	0.0000
Total Gas Cost Recovery Rate per Mcf	0.0000

Issued: April 15, 2005

Effective: June 14, 2005

NOTICE OF PROPOSED RATE CHANGE

March 22, 2005

Equitable Production Company has filed a request with the Public Service Commission to increase its rates. The rates contained in this notice are the rates proposed by Equitable Production Company. However, the Public Service Commission may order rates to be charged that differ from the rates in this notice.

Any corporation, association, body politic, or person may file written comments or a written request for intervention within thirty (30) days of the date of this notice with the Public Service Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, KY 40602.

Copies of the request for an increase in rates may be obtained by contacting Equitable Production, 225 North Shore Drive, Pittsburgh, PA 15212-5861. A copy of the request for an increase in rates is available for public inspection at this address.

Present <u>Rate</u>	Proposed <u>Rate</u>	Estimated Monthly Increase (per customer)
\$6.393	\$8.53	. \$16.27



I