

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

COLUMBIA GAS OF KENTUCKY, INC.)	
)	
COMPLAINANT)	
)	
v.)	CASE NO.
)	2009-00340
)	
NATURAL ENERGY UTILITY CORPORATION)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF
TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. ("Columbia"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than March 29, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to 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 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.

Columbia shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Columbia fails or refuses to furnish all or part of the requested information, it 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.

1. Refer to page 3 of Russell DeWayne Ryan's testimony ("Ryan Testimony"), wherein Mr. Ryan confirms that Columbia is providing service to a liquor store at 901 13th Street, a restaurant at 915 13th Street and a video store at 1200 Bryan Street that Natural Energy Utility Corporation ("NEUC") wishes to serve. Pursuant to the letters attached as Exhibit 3 to NEUC's Motion to Dismiss, all three customers requesting Columbia to terminate service are located on 13th Street and no video store is identified. Besides the liquor store at 901 13th Street and the restaurant at 915 13th Street, that exhibit identifies Checker's Tanning & Laundromat at 1001 13th Street as the third customer requesting NEUC service. Provide the names and addresses of the three customers requesting Columbia to disconnect service in order for NEUC to provide service.

2. Refer to page 5 of the Ryan Testimony, line 16, which says that NEUC installed a new plastic main adjacent to Columbia's existing medium-pressure main. Is this the line whose installation Mr. Ryan observed in July or August 2009? If not, when was this new line installed, to the best of Columbia's knowledge?

3. Refer to Exhibit 1 of NEUC's Answer and Motion to Dismiss filed September 8, 2009. State whether the ZTB Enterprises Property identified on the map is the "strip mall" that is referenced on page 2 of Columbia's complaint.

4. Provide the annual volumes used by each of the three customers identified in the response to Item 1 above and the rate schedules under which they are served.

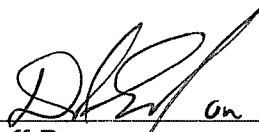
5. Explain whether Columbia has received complaints from the three customers at issue concerning Columbia's service.

6. State whether Columbia is willing and able to continue serving the three customers at issue in this proceeding.

7. Describe the financial impact on Columbia if these three customers cease receiving service from Columbia.

8. State how many customers Columbia currently serves on the mall property.

9. Provide a map illustrating Columbia's distribution system and its customers in the area of the mall property. If possible, designate the location of the new NEUC line referenced on page 5 of the Ryan Testimony.


on behalf of
Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED MAR 15 2010

cc: Parties of Record

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