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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

AN INVESTIGATION OF THE GAS COSTS OF	)	CASE NO.
B&H GAS COMPANY PURSUANT TO KRS	)	2015-00367
278.2207 AND THE WHOLESALE GAS PRICE IT	)	
IS CHARGED BY ITS AFFILIATE, B&S OIL AND	)	
GAS COMPANY, PURSUANT TO KRS 278.274	)	

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**RESPONSE OF B&H GAS COMPANY AND B&S OIL  
AND GAS COMPANY TO THE ATTORNEY  
GENERAL'S MOTION TO SET A PROCEDURAL SCHEDULE**

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Comes B&H Gas Company ("B&H"), and B&S Oil and Gas Company ("B&S"), by and through counsel, and hereby file their response to the Attorney General's Motion to Set a Procedural Schedule.

The Attorney General ("AG") mailed data requests to undersigned on March 7, 2016, which it requested be answered by April 1, 2016. The AG, in his Motion to Set a Procedural Schedule, asks the Commission to issue a procedural schedule formally setting this deadline, and in support of his position states that three weeks to answer these data requests is "more than reasonable."

Three weeks to answer the voluminous data requests made by the AG is hardly reasonable. B&H and B&S are currently working to answer these data requests; however, the requests total more than *ninety* (90) when considering the many sub-parts (for example, Request No. 33 includes thirteen (13) different requests alone). Of these requests, some ask B&H and B&S to produce voluminous records (for example, Request No. 11 asks for "all documents

setting forth costs B&S incurs in obtaining gas from B&H” which is an extremely broad request, and which will take considerable time to answer). Despite having devoted considerable time to answering these requests, additional time is needed and the three (3) weeks which the AG arbitrarily decided was “more than reasonable” is unreasonable in light of the especially broad and lengthy requests made by the AG.

Furthermore, as the Commission is aware, B&H is also in the process of preparing to file an ARF. The preparation of this filing has occupied much of B&H’s capacity, as B&H works to satisfy the self-imposed deadline of April 10, 2016 for filing its ARF. For this reason also, B&H submits that additional time is needed to respond to the AG’s data requests.

Based on the foregoing, B&H and B&S respectfully request that the Commission issue a procedural schedule giving them until at least April 18, 2016 to answer the AG’s Initial Data Requests.

Dated this 1<sup>st</sup> day of April, 2016.

Respectfully submitted,

  
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JOE F. CHILDERS

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing response has been served on the

Attorney General by mailing the same to:

Larry Cook, Esq.  
Rebecca W Goodman, Esq.  
Assistant Attorneys General  
Office of the Attorney General Utility & Rate  
1024 Capital Center Drive  
Suite 200  
Frankfort, Kentucky 40601-8204

On this the 1<sup>st</sup> day of April, 2016.

  
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JOE F. CHILDERS