

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PURCHASED GAS ADJUSTMENT FILING	)	
OF WESTERN LEWIS-RECTORVILLE	)	CASE NO.
WATER AND GAS	)	2016-00406

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO WESTERN LEWIS-RECTORVILLE WATER AND GAS

Western Lewis-Rectorville Water and Gas ("Western Lewis"), 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 on or before February 2, 2017. 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 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 governmental agency, be accompanied by a signed certification of the preparer or 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.

Western Lewis 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 Western Lewis 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 should 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 filing a paper containing personal information, Western Lewis shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Western Lewis's Gas Cost Recovery ("GCR") application, Schedule I. This Schedule lists a total Actual Adjustment ("AA") of (\$2.9395) per Mcf, and a total Balance Adjustment of (\$1.1255) per Mcf. Explain if Western Lewis is aware that these large over-recoveries of gas that must be refunded to its customers are a result of consistently having an Expected Gas Cost ("EGC") in excess of what the actual cost of gas is from Atmos Energy.

2. Explain if Western Lewis has the ability to make the refunds referenced in Item 1.

3. Explain if Western Lewis maintains its GCR revenues separately from its base rate revenues.

4. Explain any steps Western Lewis has taken to address the large over-recoveries of its gas costs.

5. Refer to Western Lewis's GCR application, Schedule II. State whether the BTU Conversion Factor of 1084.6 is a calculated number, or is a number provided by Western Lewis's natural gas supplier, Atmos Energy.

a. If the BTU Conversion Factor is a calculated number, explain how this number is calculated using 38,648 Dth and 35,326 Mcf.

b. If the BTU Conversion Factor is provided by Atmos Energy, explain how the Mcf of 35,326 was calculated using the BTU Conversion Factor of 1084.6 and 36,648 Dth.

6. Refer to the GCR application, Schedule II. This schedule shows Lost and Unaccounted for ("L&U") gas of 16 percent. Western Lewis's previous two GCR applications show L&U gas of 13 percent<sup>1</sup> and 12 percent.<sup>2</sup> However, Western Lewis's 2015 Annual Report on file with the Commission shows L&U gas of approximately 2 percent.<sup>3</sup> List and describe any issues that are contributing to the increase in Western Lewis's L&U gas.

7. Provide a Schedule listing the previous 24 months' purchase and sales volumes.

8. Explain whether Western Lewis uses cycle billing for its gas customers, or if all customer bills are prepared for the same usage period.

9. Provide the date or dates Western Lewis typically reads its gas customers' meters each month.

10. Provide the date Western Lewis typically receives its bill from Atmos Energy each month, and explain what usage period that bill covers.

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<sup>1</sup> Case No. 2016-00313, Purchased Gas Adjustment Filing of Western Lewis-Rectorville Water & Gas (Ky. PSC Sept. 26, 2016).

<sup>2</sup> Case No. 2016-00191, Purchased Gas Adjustment Filing of Western Lewis-Rectorville Water & Gas (Ky. PSC June 30, 2016).

<sup>3</sup> (727 Mcf / 39,581 Mcf), Annual Report of Western Lewis-Rectorville Water and Gas District to the Public Service Commission for the calendar year ended December 31, 2015, page 37 of 42.



Talina R. Mathews  
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Public Service Commission  
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DATED JAN 23 2017

cc: Parties of Record

Case No. 2016-00406

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