

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DELTA	)	CASE NO.
NATURAL GAS COMPANY, INC. FOR ITS PIPE	)	2022-00341
REPLACEMENT FILING	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO DELTA NATURAL GAS COMPANY, INC.

Delta Natural Gas Company, Inc. (Delta), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on January 19, 2023. The Commission directs Delta to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Delta shall make timely amendment to any prior response if Delta obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Delta fails or refuses to furnish all or part of the requested information, Delta 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, Delta shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Jonathan Morphew (Morphew Direct Testimony), page 4, lines 13-17, and Schedule IV 2022-Summary. Explain why Delta is proposing to include in its Pipeline Replacement Program (PRP) 2022 spend in excess of amounts recovered in base rates.

2. Refer to the Morphew Direct Testimony, page 4, lines 19-20. Explain why Delta is proposing to true-up PRP amounts recovered in base rates.

3. Refer to Schedule I and Schedule II 2023. Explain why Delta did not use a 13-month average rate base to calculate its forecasted PRP rates.

4. Provide a 2023 PRP rate calculation that uses a rate base which excludes 2022 spend, includes a 13-month average of 2023 spend, and uses the pro rata method to determine accumulated deferred income taxes.

5. Provide the number of leaks per year on Delta's system from 2018 through the most recently available leak survey.

6. Provide the lost and unaccounted for gas percentage on Delta's system from 2018 through the most recently available information.

7. Provide all Requests for Proposals (RFPs) or invitations to bid that Delta has sent to construction companies related to this pipe replacement program since January 1, 2019.

8. Provide all responses or bids that Delta received to any RFPs or invitations to bid sent to construction companies related to this pipe replacement program since January 1, 2019. Identify the winning bids and the method used to select the winning bids.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED     JAN 10 2023    

cc: Parties of Record

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