

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO VALLEY	)	
GAS, INC. FOR AN ALLEGED FAILURE TO	)	CASE NO.
COMPLY WITH COMMISSION ORDERS AND	)	2023-00331
KRS 278.160	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO VALLEY GAS, INC.

Valley Gas, Inc. (Valley Gas), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on January 19, 2024. The Commission directs Valley Gas 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.

Valley Gas shall make timely amendment to any prior response if Valley Gas obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Valley Gas fails or refuses to furnish all or part of the requested information, Valley Gas 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, Valley Gas 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 Valley Gas's response to Commission Staff's First Request for Information (Staff's First Request), Item 10. Provide all invoices and supporting documentation to justify and verify the figures in the monthly usage reports for Mago Construction Company (Mago) for the years 2018, 2019, 2020, 2021, 2022, and 2023 that were provided as an attachment to Valley Gas's response to Staff's First Request, Item 10.

2. Refer to Valley Gas's response to Staff's First Request, Item 11. Provide all invoices and supporting documentation to justify and verify the figures in the monthly billing Valley Gas charged to Mago for the years 2018, 2019, 2020, 2021, 2022, and 2023 that were provided as an attachment to Valley Gas's response to Staff's First Request, Item 10.

3. Refer to Valley Gas's Response to Staff's First Request, Item 12. Provide all invoices and supporting documentation to justify and verify the figures in the monthly usage reports for Valley Gas residential and commercial customers for the years 2018, 2019, 2020, 2021, 2022, and 2023 that were provided as an attachment to Valley Gas's response to Staff's First Request, Item 10.

4. Refer to Valley Gas's response to Staff's First Request, Item 13. Provide all invoices and supporting documentation to justify and verify the figures in the cost and volume of Mcf of natural gas purchased by Valley Gas for each month for the years 2018, 2019, 2020, 2021, 2022, and 2023 that were provided as an attachment to Valley Gas's response to Staff's First Request, Item 10.

5. Provide all invoices and supporting documentation to justify and verify the amount of natural gas storage injects and withdrawals for each month for the years 2018, 2019, 2020, 2021, 2022, and 2023.

6. Refer to Case No. 2022-00315, Informal Conference Memo, paragraph 3.<sup>2</sup>  
a. Confirm that Valley Gas has been charging Mago the Gas Cost Recovery (GCR) rate.

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<sup>2</sup> Case No. 2022-00315, *Electronic Application of Valley Gas, Inc. for an Alternative Rate Adjustment* (filed Apr. 17, 2023), Informal Conference Memo, paragraph 3.

b. Provide the dates in which Valley Gas started charging Mago the GCR rate and stopped charging Mago the GCR rate, if applicable.



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DATED JAN 03 2024

cc: Parties of Record

Case No. 2023-00331

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