

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF VALLEY GAS,	)	
INC. OF AN AMENDMENT TO A SPECIAL	)	CASE NO.
CONTRACT WITH MAGO CONSTRUCTION	)	2023-00402
COMPANY	)	

COMMISSION STAFF'S FIRST 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 24, 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

---

<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 Amendment No. 1 to the Amendment to the Mago Agreement (Amendment).

a. Identify all types of costs incurred by Valley Gas that the \$489 charge added by the Amendment is intended to cover.

b. Provide actual monthly costs incurred and hours of labor performed in furtherance of the type of work and equipment identified in Valley Gas's response to

Item 1(a) above for the duration of the special contract with Mago Construction Company (Mago).

c. Provide a breakdown of the calculation of the \$489 charge added by the Amendment.

d. Provide any documents used to determine any equipment or labor costs used to calculate the \$489 charge.

2. Refer to Amendment No. 1 to Amendment. Under the terms of the Amendment, state whether Mago would be charged Valley Gas's tariff base usage rate per Mcf<sup>2</sup> in addition to the proposed \$489 monthly meter charge and the Gas Cost Recovery rate when it purchases its natural gas from Valley Gas.

3. Refer to Amendment No. 1 to Amendment. Also, Refer to the Mago Agreement contract approved by the Commission in Case No. 2014-00368<sup>3</sup> (Mago Contract). Confirm that Article 2 and Article 4 of the Mago Contract are no longer under confidential protection.

4. Clearly state what Mago would be charged by Valley Gas under the terms of the Mago Contract and Amendment in the situation that Mago purchases its natural gas from Valley Gas. Provide each billing line item.

---

<sup>2</sup> Valley Gas's most recent base usage rate of \$3.1821 per Mcf was approved by the Commission in Case No. 2022-00315, *Electronic Application of Valley Gas, Inc. for an Alternative Rate Adjustment* (Ky. PSC Aug. 18, 2023).

<sup>3</sup> Case No. 2014-00368, *Valley Gas, Inc. Request for Approval of a Special Contract with Mago Construction Company and a Deviation from the Gas Cost Adjustment Clause* (Ky. PSC Oct. 28, 2014).

5. Clearly state what Mago would be charged by Valley Gas under the terms of the Mago Contract and Amendment if Mago purchases its natural gas from Constellation Energy. Provide each billing line item.

6. State why the \$489 charge was not included in the original special contract with Mago.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED       JAN 09 2024      

cc: Parties of Record

\*Honorable W. Duncan Crosby III  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828

\*Emily S. Childress  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Gerald E Wuetcher  
Attorney at Law  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Valley Gas, Inc.  
401 S First Street  
P. O. Box 366  
Irvington, KY 40146