

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 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 April 15, 2024. The Commission directs Valley Gas to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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. 2 to Mago Agreement.² Clearly state what Mago Construction Company (Mago) would be charged by Valley Gas under the terms of the Mago Contract and Amendment No. 2 to Mago Agreement in the situation that Mago purchases its natural gas from Valley Gas. Provide each billing line item.

² TFS 2024-00078 (filed Feb 26, 2024) and Order (Ky. PSC Mar. 15, 2024), Appendix B.

2. Refer to Amendment No. 2 to Mago Agreement. Clearly state what Mago would be charged by Valley Gas under the terms of the Mago Contract and Amendment No. 2 to Mago Agreement if Mago purchases its natural gas from Constellation Energy or another natural gas supplier. Provide each billing line item.

3. Confirm whether the information provided by Valley Gas in its response to Commission Staff's First Request for Information, Item 1 is still pertinent to the \$489 monthly meter fee included in Amendment No. 2 to Mago Agreement. If not, then provide the updated cost justification for the \$489 monthly per meter fee.

4. Explain how Valley Gas plans to update the Commission should Mago and Valley Gas decide to terminate the Mago Agreement³ and Amendment No. 2 to the Mago Agreement.

5. Explain how Valley Gas plans to update the Commission should Mago and Valley Gas decide to make any changes to the Mago Agreement and Amendment No. 2 to the Mago Agreement.

6. Explain how Valley Gas plans to track and update the Commission in its Gas Cost Recovery rate reports should Mago purchase natural gas from Constellation Energy or a another natural gas supplier.

³ Case No. 2024-00368, *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).



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED APR 01 2024

cc: Parties of Record

Case No. 2023-00402

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