

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
COMMERCIAL PROPANE SERVICE, LLC AND)	
OLD BRIDGE GAS UTILITY LLC FOR)	
APPROVAL OF OLD BRIDGE GAS UTILITY)	CASE NO.
LLC'S ACQUISITION OF COMMERCIAL)	2024-00382
PROPANE SERVICE LLC'S UTILITY ASSETS IN)	
OLD BRIDGE SUBDIVISION, DANVILLE,)	
KENTUCKY)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO COMMERCIAL PROPANE SERVICE, LLC D/B/A
BRIGHT'S PROPANE SERVICE, INC. AND OLD BRIDGE GAS UTILITY LLC

Commercial Propane Service, LLC d/b/a Bright's Propane Service, Inc. (CPS) and Old Bridge Gas Utility LLC (Old Bridge Gas) (collectively, Joint Applicants), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on February 7, 2025. The Commission directs Joint Applicants 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

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).

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

Joint Applicants shall make timely amendment to any prior response if Joint Applicants 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 Joint Applicants fails or refuses to furnish all or part of the requested information, Joint Applicants 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, Joint Applicants 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 Joint Applicants' response to Commission Staff's First Request for Information (Staff's First Request), Item 1. Explain whether Ms. Sayers has any

experience in the propane or gas industry, any managerial experience, or any trainings with regulated utilities.

2. Refer to Joint Applicants' response to Staff's First Request, Item 3.

a. Explain what revenue stream the Joint Applicants will use to pay Russmar for its services.

b. Provide the current contract between Russmar and CPS.

3. Refer to Joint Applicants response to Staff's First Request, Item 5a regarding the sentence, "[t]he balance for outstanding account receivables is insignificant".

a. Provide the maximum dollar amount that constitutes an insignificant amount.

b. Provide the current amount of revenue to be collected from outstanding accounts receivables.

c. Provide, via percentage, the outstanding accounts receivable as compared to the total accounts receivables.

4. Refer to Joint Applicants' response to Staff's First Request, Item 8.

a. Confirm whether Jared Sayers is related to Tim Sayers. If confirmed, explain the nature of relationship.

b. State whether any employees would be terminated as a result of this acquisition.

5. Refer to Joint Applicants' response to Staff's First Request, Item 11 regarding the sentence "Old Bridge LLC will provide Utility customers a letter explaining

the details of the Utility transfer upon Commission approval.” Explain where Old Bridge Gas will receive the revenue to pay for customer notice.

6. Refer to Joint Applicants’ response to Staff’s First Request, Item 12, regarding all bank loan agreements to be used in the purchasing of CPS by Old Bridge Gas.

a. Provide a copy of all bank loan agreements related to the acquisition.

b. Explain how Old Bridge Gas will acquire the revenue required to pay the debt arising from the acquisition if the Commission approves Old Bridge Gas’s purchase of CPS. In this response, explain whether these debts will be paid using the revenues obtained from customers.

7. Refer to Application, pages 4-5. Identify whether Old Bridge Gas plans to file a financing application with the Commission if this acquisition is approved. If so, explain all reasoning behind the decision to seek financing for this acquisition.

8. Refer to Application, pages 4-5. Provide data and supporting information to demonstrate the specific benefits of the acquisition for the customers of Old Bridge Gas.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
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DATED JAN 28 2025

cc: Parties of Record

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