

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SIGMA GAS CORPORATION)	CASE NO.
)	2004-00018
COMPLAINANT)	
)	
V.)	
)	
B.T.U. GAS COMPANY, INC.)	
)	
DEFENDANT)	

SECOND DATA REQUEST OF COMMISSION STAFF
TO SIGMA GAS CORPORATION

Sigma Gas Corporation ("Sigma Gas"), pursuant to 807 KAR 5:001, is to file with the Commission the original and four copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 7, 2004. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request. When applicable, the information requested

herein should be provided for total company operations and jurisdictional operations separately.

1. Enclosed is a map of the general Salyersville area showing mains and pipelines serving customers of both Sigma and B.T.U. Gas Company, Inc. ("BTU"). This map was compiled by Commission Staff from three sets of maps, all originally at different scales on different base maps as filed by Sigma and BTU in this case. Staff is of the opinion the map accurately reflects the pipeline system and customers of each party as filed by the parties.

The parties are placed on notice that it is the intention of Commission Staff to introduce this map at the formal hearing as a Staff exhibit. Each party is being furnished two copies of the map. Each party is to examine said map and if any party wishes to make additional system data available for its respective system only, it may do so by attaching a copy with its responses to the data request. The party should mark on the returned copy in black pen any corrections or additions it wishes to have noted for its system only and state specifically, by separate document, the reason for the request. One week after the due date of the responses to this information request, Commission Staff will file a copy of this map with corrections or additions, if any, as a Commission Staff exhibit to be tendered for filing in the record at hearing.

2. In reference to the above map, answer the following:

a. From which source or sources does Sigma obtain its supply of natural gas? If possible, indicate clearly upon the map a point of interconnection to a pipeline, or location of wells and gathering lines used by Sigma to supply natural gas in the mapped area.

b. In Item 5 of Sigma's responses filed in reply to the Commission Order of February 23, 2004, Sigma identified a customer as "beside Grover Salyers." Is this customer located on the map and, if so, under which name?

3. In its response to the Order of February 23, 2004, Sigma identified mains and service connections for customers contained in its complaint. As to each area identified (College Street area, Dixie, new courthouse, and waterworks), state the date each facility, pipeline, or connection was constructed.

4. In Paragraph 7 of its complaint, Sigma states that the extension of facilities may constitute a violation of safety regulations of 807 KAR 5:022. State which particular sections of the cited regulation BTU may allegedly have violated.

5. In Paragraph 10 of its complaint, Sigma states that the actions of BTU are in violation of Commission regulations and constitute an interference with the operations of Sigma. Answer the following:

a. Identify the actions and the specific regulations Sigma alleges were violated.

b. Identify the actions Sigma claims interfere with its operations.

6. In Paragraph 11 of its complaint, Sigma requests that the Commission "determine if BTU's service constitutes a violation of KRS Chapter 278." Identify which section or sections of KRS Chapter 278 Sigma claims BTU violated.

7. Sigma requests that the Commission determine the legitimate gas supplier to the affected customers and area in and near Salyersville. Given the absence of certified territory for local distribution companies, and the current existence of facilities

to serve these customers, upon which statutory provision or legal precedent does Sigma contend the Commission should make the determination?



Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED May 21, 2004

cc: All Parties