

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DELTA	)	CASE NO.
NATURAL GAS COMPANY, INC. FOR PIPE	)	2024-00332
REPLACEMENT FILING	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO DELTA NATURAL GAS COMPANY, INC.

Delta Natural Gas Company, Inc. (Delta), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 11, 2024. The Commission directs Delta 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.

Delta shall make timely amendment to any prior response if Delta 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 Delta fails or refuses to furnish all or part of the requested information, Delta 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, Delta 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 the Annual PRP Filing, Excel titled, "PRP\_Schedules.xlsx", Tab: "Schedule II 2023 Yr 1", Cells O6:O11. Describe how the cost of removal rates were determined.

2. Refer to the Annual PRP Filing, Excel spreadsheet titled, "PRP\_Schedules.xlsx", Tab, "Schedule IV 2024.", Column E, "Total Cost".

a. For each item designated as “Distribution Mains,” describe the makeup (materials, labor, etc.) of the total cost of replacement for each length of main.

b. For each item designated as “services”, describe the makeup of the “\$1,591.35” amounts.

3. Refer to the Annual PRP Filing, PRP\_2025\_Proposed\_Tariffs\_and\_Schedules.pdf, beginning with page titled “2023 Schedule IV, Page 11 of 25.” Regarding the charges incurred due to “Engineering Services.”

a. Explain the scope of services provided.

b. Explain why engineering service charges are not required in 2025 projections on referenced page 12 of 25.

4. Refer to the Annual PRP Filing, Direct Testimony of Jonathan Morpew (Morpew’s Testimony), beginning at page 3, line 14.

a. Describe the current stage of replacement of Aldyl-A.

b. Provide a map of the locations where Delta replaced Aldyl-A pipe during 2024.

5. Explain Delta’s process for selecting and prioritizing pipe segments for replacement.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED NOV 27 2024

cc: Parties of Record

Case No. 2024-00332

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