

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)	
)	
GEORGIA JOHNSON)	CASE NO.
COMPLAINANT)	2018-00263
)	
v.)	
)	
PEOPLES GAS KY LLC)	
DEFENDANT)	

DEFENDANT PEOPLES GAS KY LLC'S ANSWERS TO COMMISSION STAFF'S
INITIAL REQUEST FOR INFORMATION

PEOPLES GAS KY LLC
CASE NO. 2018-00263
COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION

Witness: Edward Palombo

1. Does Peoples own or operate any producing natural gas wells or natural gas gathering lines in the Commonwealth of Kentucky?

ANSWER: No, as Peoples purchased the assets of Equitable Gas Company, LLC, which likewise did not own any such wells or gathering lines.¹

¹ See Equitable Gas Company, LLC's Response to Commission Staff's Initial Request for Information No. 2 filed on July 19, 2013 in Case No. 2013-00163 ("Equitable does not own any gathering lines or producing wells in Kentucky.").

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2. Identify all suppliers of natural gas to Peoples.

ANSWER: Diversified Gas and Oil PLC (“Diversified”). On July 18, 2018, Diversified purchased the EQT Corp.’s Southern Appalachian producing gas and oil and midstream assets, including the Kentucky wells and gathering pipelines. Diversified abandoned the well line at issue in this proceeding in early October 2018. When Peoples asked Diversified if Loran Rice’s meter could be moved to another location, Diversified said no other line was available. As such, there has been no gas available for Peoples to supply Mr. Rice since Diversified abandoned the line.

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3. How many customers does Peoples currently provide natural gas service to?

ANSWER: 3,083

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4. Does Peoples sell natural gas to any customer whose property and point of use is not within one-half air mile of a producing well or natural gas gathering line owned or operated by Peoples or one of its suppliers?

ANSWER: To the best of Peoples' knowledge and belief, no.

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5. State whether Peoples has ascertained all of its customers' eligibility for natural gas service under KRS 278.485, and if so, explain how Peoples confirms a customer's eligibility.

ANSWER: Peoples began ascertaining customers' eligibility for those customers commencing service beginning December 17, 2013, the date upon which PNG Companies LLC purchased Equitable Gas Company, LLC. Peoples reviews the applications submitted by individuals requesting service to determine if the property to be served appears to be located within one-half air mile of a gathering pipeline. If the mileage criteria appear to have been met, Peoples contacts Diversified regarding the proposed service. Please note that in Case No. 2013-00163, the proceeding in which the Commission determined a CPCN was not required for PNG Companies LLC's purchase of Equitable Gas Company, LLC, Equitable stated that it was not serving any customers it was not required to serve pursuant to KRS 278.485.²

² See Equitable Gas Company, LLC's Response to Commission Staff's Initial Request for Information No. 4 filed on July 19, 2013 in Case No. 2013-00163 ("Equitable Gas Company, LLC does not presently serve any customers it is not required to serve pursuant to KRS 278.485.").

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6. When Peoples receives an application for natural gas service, does it ascertain the applicant's eligibility for natural gas service under KRS 278.485? If so, explain how.

ANSWER: Please refer to the answer to Question 5.

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7. Was an application made for natural gas service to property located at 15 C Loren Way, Garner, Kentucky (Property)? If so, provide a copy of the application and all related correspondence.

ANSWER: Gas service was commenced in, or about, September 1965 in the name of Loran Rice. Peoples does not have record of an application, however, a copy of the Domestic Gas Sales Agreement between Mr. Rice and the predecessor company to Peoples is attached. Please note that the contract expressly states that service was to be provided subject to KRS 278.485.

Personal identifying information of non-parties
have been redacted.

September 9, 1965

Mr. Loran Rice

██████████, Kentucky

Dear Mr. Rice:

We are enclosing herewith one fully
executed copy of domestic gas sales agreement
dated September 7, 1965, made by and between
yourself and Kentucky West Virginia Gas Company.

This contract replaces that of ██████████,
Hindman, Kentucky, Account No. ██████████.

Yours very truly,



Fred Meece, Land Agent

FM/lfg

Enclosure

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8. Has Peoples solicited applicants for new natural gas service? If so,
 - a. Describe how applicants are (or were) solicited;
 - b. State the number of new or former customers Peoples has signed up as a result of a solicitation for new or restored natural gas service;
 - c. Does Peoples currently solicit new customers?

ANSWER: Peoples does not solicit new customers for natural gas service.

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9. As of August 7, 2018, who did Peoples bill for natural gas service to the Property?

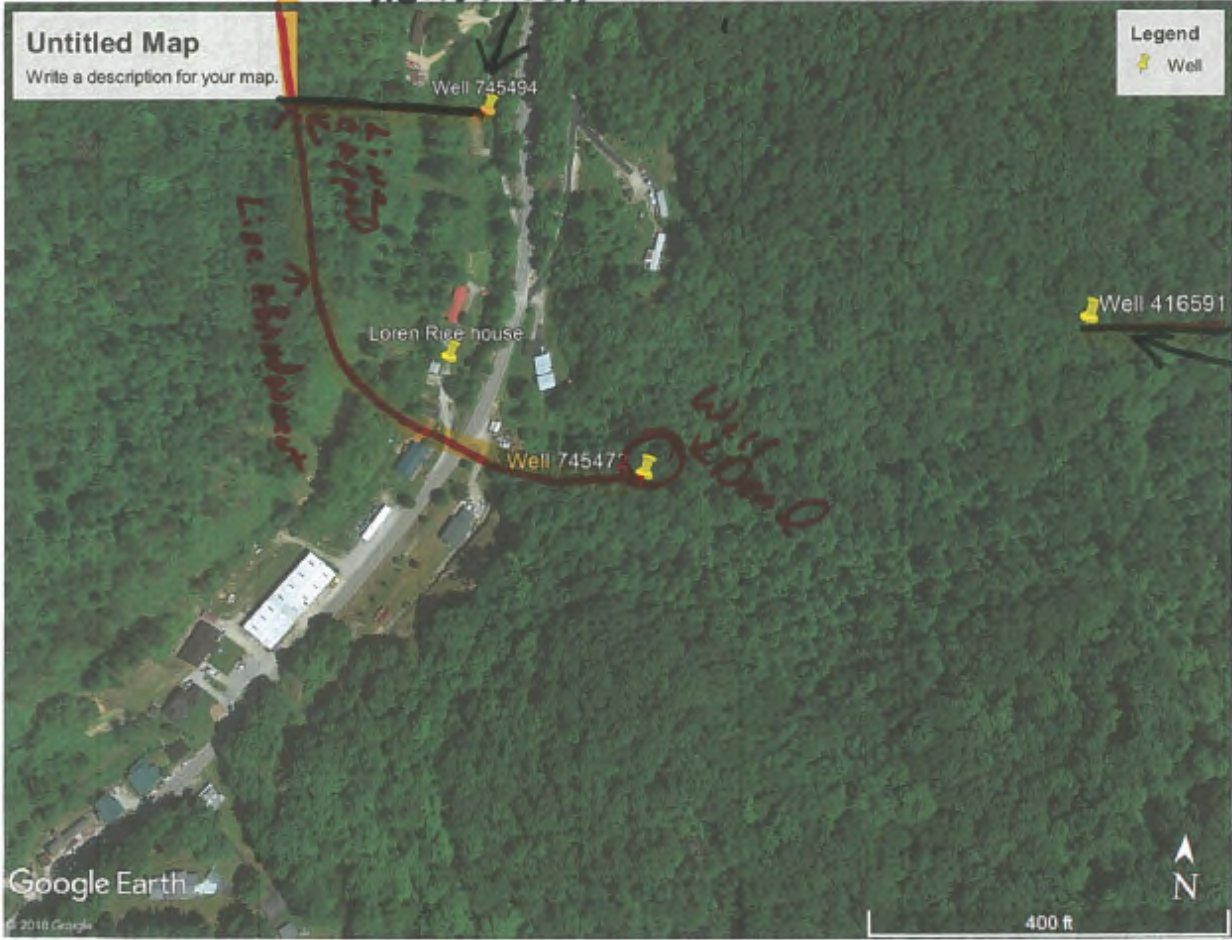
ANSWER: Loran Rice. Bills were sent in care of Georgia Johnson as of that date.

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10. Provide a map showing the Property, the location of line serving the Property, and all points of interconnection with any other pipeline or source of supply.

ANSWER: Please see the attached. WL-745472 is the line that previously served Mr. Rice before it was abandoned by Diversified. To the best of Peoples' knowledge, WL-745494 is approximately 3100' away from Loran Rice's residence, and WL-416591 is approximately 3500' away from Loran Rice's residence. Peoples is without knowledge of the location of other pipelines or sources of supply.



Untitled Map

Write a description for your map.

Legend
Well

Google Earth

© 2016 Google

400 ft



Active Well

Active Well

Line Abandoned

Well 74547

Well 745494

Loren Rice house

Well 74547

Well 416591

VERIFICATION

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

Edward Palombo being duly sworn, deposes and says that he is the Vice President Reliability for Peoples Gas KY LLC and that he has read the foregoing Responses to Requests for Information and that said matters are true and correct to the best of his knowledge and belief.

Edward Palombo
Edward Palombo

Subscribed and sworn to before me, a Notary Public in and for the above County and Commonwealth, on this 28th day of December, 2018.

Andrew Weisner
Notary Public

My Commission Expires:

8/20/21

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Andrew Weisner, Notary Public
Hampton Twp., Allegheny County
My Commission Expires Aug. 20, 2021
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES