

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC CECIL JARRELL)
D/B/A SLICK ROCK GAS COMPANY) CASE NO. 2020-00258
REQUEST TO ABANDON)

ATTORNEY GENERAL’S INITIAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Data Requests to Cecil Jarrell (hereinafter “Jarrell” or “company”) to be answered by October 23, 2020 and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda

of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the

control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

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Respectfully submitted,

DANIEL J. CAMERON
ATTORNEY GENERAL



J. MICHAEL WEST
LAWRENCE W. COOK
ANGELA M. GOAD
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE, SUITE 200
FRANKFORT, KY 40601-8204
PHONE: (502) 696-5433
FAX: (502) 573-1005
Michael.West@ky.gov
Larry.Cook@ky.gov
Angela.Goad@ky.gov
John.Horne@ky.gov

Certificate of Service and Filing

Pursuant to the Commission's Orders dated March 16, 2020 and March 24, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that, on September 29, 2020, a copy of the forgoing was served to the following. A physical copy of the filing will be submitted to the Commission once the State of Emergency has ceased.

Slick Rock Gas Company
3375 KY RT 321
Prestonsburg, KY 41653

this 29th day of September, 2020

A handwritten signature in blue ink, appearing to read "J. Michael New". The signature is written in a cursive style with a horizontal line extending from the end.

Assistant Attorney General

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Data Requests

1. List the names and addresses of all customers of the company.
2. To the extent known, discuss the natural gas usage of those customers and the ability of those customers to obtain alternative means of service. For example, do the customers use natural gas to heat their homes, cook with natural gas, use natural gas for hot water tanks, etc.
3. Provide the monthly average natural gas consumption for each customer.
4. Explain whether the company has discussed the pending case with the customers, and if so, provide the customer feedback.
5. Generally discuss the history of the company's operation.
6. Provide copies of the company's annual reports, including balance sheets, for 2015-2020.
7. Provide a copy of all inspection reports for Slick Rock Gas Company facilities for 2018-2020.
8. Describe generally the facilities (specifically the pipeline infrastructure) owned by the company.
9. Provide the number of gas wells that are used to serve the company's customers.
10. Provide the location of each gas well that is used to serve the company's customers.
11. Identify the owner of each gas well that is used to serve the company's customers.
12. Identify who sold Mr. Jarrell each gas well, and the monetary amount that was paid for each gas well.
13. Describe the relationship of the location of the infrastructure owned by the company to other pipeline infrastructure owned by other companies located in the area.
14. Which company owns infrastructure that is closest in proximity to the infrastructure owned by the company?
15. Discuss whether the company has had any discussions with any other company about selling the infrastructure. If so, describe those discussions.
16. Discuss whether the company has had any discussions with any other company about

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providing service to the company's customers after the company abandons. If so, describe those discussions.

17. Discuss generally the feasibility of another entity operating the company's current infrastructure and/or connecting to the current infrastructure.
18. Identify when the company began providing natural gas service to customers.
19. Explain why the company began providing natural gas service to customers.
20. Explain whether the company ever provided natural gas to industrial or commercial customers.
21. Explain in detail whether the company has always operated as a local distribution company/utility, or if it ever operated as a farm tap company.
22. Explain in detail whether the company is currently abiding by the tariff that is on file with the Commission with regard to what the customers are being charged for natural gas service.
23. Explain in detail whether the company previously abided by the tariff that is on file with the Commission with regard to what the customers were being charged for natural gas service.
24. Provide the monthly monetary amount that the company is currently charging each customer.
25. Provide the monthly monetary amount that the company was previously charging each customer.
26. Explain why the company never filed a rate case or a purchased gas adjustment case, if applicable, with the Commission.