

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DELTA)	
NATURAL GAS COMPANY, INC. FOR A)	
CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY TO)	CASE NO. 2022-00085
CONSTRUCT A PIPELINE TO SERVE THE)	
CITIES OF NICHOLASVILLE AND)	
WILMORE)	

MOTION TO INCORPORATE DOCUMENTS

Delta Natural Gas Company, Inc. (“Delta”), hereby moves the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 11(5) that certain documents in the Commission’s files be incorporated by reference into the record of this case.

In Case No. 2021-00185, Delta requested authority to adjust its gas rates and for a Certificate of Public Convenience and Necessity (“CPCN”) to construct a pipeline that will provide the Nicholasville and Wilmore portion of Delta’s system with a second source of supply. During the course of Case No. 2021-00185, Delta provided significant information and support regarding the proposed pipeline through data responses and testimony. Delta informed the Commission that it was withdrawing its request for the CPCN in Case No. 2021-00185 and that it planned to file a new application for the CPCN in the first quarter of 2022.

The documents Delta requests be incorporated by reference include the following portions of the record of Case No. 2021-00185:

- Application and Filing Requirement Tab 19;
- Direct and Rebuttal Testimony of John B. Brown;
- Direct and Rebuttal Testimony of Jonathan Morphew;

- Delta's Response to Commission Staff's First Data Request Nos. 23 and 24;
- Delta's Response to Commission Staff's Second Data Request Nos. 15, 16, 17, 18, and 19;
- Delta's Response to Commission Staff's Third Data Request Nos. 3, 7, and 9; and
- Delta's Response to Commission Staff's Fourth Data Request Nos. 4 and 8.

WHEREFORE, Delta Natural Gas Company, Inc. respectfully moves the Kentucky Public Service Commission to incorporate by reference the above-referenced documents in this proceeding.

Dated: March 25, 2022

Respectfully submitted,



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Inc.

CERTIFICATE OF COMPLIANCE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on March 25, 2022; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

Marcia H. Braun
