

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

<i>Electronic</i> Application of East Kentucky	)	Case No.
Midstream, LLC for Approval of Proposed	)	2023-00112
Tariff under 807 KAR 5:026, Section 9	)	

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**Response to Commission Staff’s First Request for Information**

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East Kentucky Midstream (EKM) herewith submits its Response to the Commission Staff’s First Request for Information. A signed, notarized verification for this Response appears on the following page.

Respectfully submitted,

/s/ Katherine K. Yunker

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

<i>ELECTRONIC APPLICATION OF EAST</i>	)	Case No.
<i>KENTUCKY MIDSTREAM, LLC FOR APPROVAL</i>	)	2023-00112
<i>OF PROPOSED TARIFF UNDER 807 KAR 5:026,</i>	)	
<i>SECTION 9</i>	)	

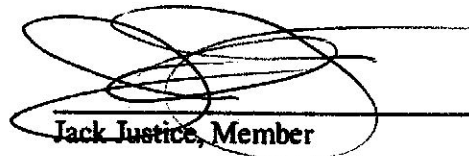
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**Certification**

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This is to certify that I have supervised the preparation of the Response to the Commission Staff's First Request for Information to East Kentucky Midstream on behalf of the corporate respondent and that the responses from myself and the other witness(es) are true and accurate to the best of my knowledge, information and belief after reasonable inquiry.

DATE: 8-29-23

  
Jack Justice, Member

### **Request**

1. Refer to the proposed tariff, PSC KY NO. 1, Original Sheet No. 2. The tariff references the possibility of a supply of gas for resale. Explain under what circumstances an applicant for farm tap service would be in a position to resell gas.
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### **Response**

The proposed Tariff (Appl. Exh. B p.3/13), Original Sheet No. 2, refers to supply of gas to persons otherwise qualifying for farm tap service but for which a special contract would be required because of, among other things, resale by the applicant/property owner. EKM cannot anticipate all the circumstances under which an applicant/property owner would be in a position to resell gas and whose property has located on it (a) a producing gas well or gas gathering pipeline or (b) a service location within one-half air-mile of such a well or gathering pipeline. One possibility, however, is that the owner of such a property with multiple tenants could have a master meter or have a lease in which the tenants split or are otherwise charged for the gas service.

### **Request**

2. Refer to the proposed tariff, PSC KY NO. 1, Original Sheet No. 3.
    - a. Provide detailed cost support for the following charges and explain for each charge whether the labor associated with these services is already included in East Kentucky Midstream's calculation of its monthly customer and usage charges
      1. Installation Fee of \$25.
      2. Seasonal/Temporary Disconnect Fee of \$100.
    - b. Explain whether the Seasonal/Temporary Disconnect Fee is charged separately for the disconnection and reconnection or whether the \$100 charge includes the cost of both the disconnection and reconnection.
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### **Response**

- a.1. Installation Fee of \$25.

This charge is a continuation of a \$25 charge collected by EKM's predecessor for activating an account and to defray the costs of setting up a customer account on the books and records for billing, meter identification and location, and other purposes, and any field work to turn on gas service to the account location (*e.g.*, by opening a shut-off valve). These account activation activities could occur at or after the installation of a meter at a new service point or to restart or restore service to an existing service point.<sup>1</sup> Because this charge is unchanged from current practice, EKM did not develop a cost justification for it; however, EKM estimates that:

- office employee time to set up a customer account is approximately 10-15 minutes; and

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<sup>1</sup> In responding to the PSC Staff requests, EKM has come to think that the label "Installation Fee" and the descriptions and other terms used in the proposed Tariff (Appl. Exh. B) might be confusing about this fee, its purpose, and when it is applicable. EKM will work to clarify the proposed Tariff phrasing and submit revised or amended Tariff sheets as appropriate. This clarified Tariff language will keep the fee at \$25.00 and continue the practice of applying it to the initial connection and re-connection of gas service.

- field employee time to open gas flow to the meter is typically brief, but there is travel time and expense (e.g. mileage) in getting to the shut-off valve.

EKM also notes that 807 KAR 5:026, § 7(1), mandates that service “shall not be re-established” after termination for non-payment until the customer has paid the arrears “plus a turn on charge of twenty-five (25) dollars.”

Labor costs and mileage expense are included in the 2022 operating expenses from which the allocation to farm-tap service operations was made and used to support the proposed recurring charges.

a.2. Seasonal/Temporary Disconnect Fee of \$100.

This is a new option proposed by EKM, for those customers who do not want to permanently discontinue service, but want gas service shut off to a location for a season or other period of time, and to know that the ability to serve that location will be maintained in the meantime. EKM does not offer this option now, but realizes that a customer could achieve the same effect by asking for disconnection of service as if abandoning the location or permanently switching to another energy source, risk that the meter would be pulled,<sup>2</sup> and then ask for re-activation of service as winter approaches or the service location is re-leased. Labor and travel costs imposed on EKM if one or more farm-tap customers followed that hypothetical pattern in 2022 are included in the 2022 operating expenses from which the allocation to farm-tap service operations was made.

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<sup>2</sup> See proposed Tariff (Appl. Exh. B, p.11/13), Original Sheet No. 4.6 (Rule 6.e), providing that, other than for a seasonal disconnect or change in ownership, on cessation of service, “EKM may remove the meter, close the tap, or both for the respective point of service.”

Although in some sense “continuing,” the temporary-disconnect customer would not be billed or pay the customer charge for the seasonal/temporary disconnection period.

Customer choice of this option will involve the same pattern of labor and travel costs as with the Installation Fee for both the de-activation and re-activation of service. The proposed fee thus covers two times the Installation Fee (2 x \$25.00); the remaining \$50.00 of the proposed fee would contribute toward the fixed and maintenance costs of the general system and particular infrastructure serving that location.

- b. The Seasonal/Temporary Disconnect Fee will not be charged separately for the disconnection and then the reconnection; it will be charged up front and includes the cost of a paired disconnection and reconnection. *See* proposed Tariff (Appl. Exh. B, p.11/13), Original Sheet No. 4.6 (Rule 6.d).

### **Request**

3. Refer to the proposed tariff, PSC KY NO. 1, Original Sheet No. 4.4. Explain whether East Kentucky Midstream plans to charge a set amount for the meter test fee or if the amount will vary based on the cost of each test. If the amount will be a set amount, provide detailed cost support for the charge and explain whether the labor associated with the service is already included in East Kentucky Midstream's calculation of its monthly customer and usage charges.
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### **Response**

EKM plans to charge an amount for the meter test fee that will vary based on the cost of each test.

### **Request**

4. Refer to the proposed tariff, PSC KY NO. 1, Original Sheet No. 4.4.
    - a. Explain how East Kentucky Midstream arrived at a deposit amount of \$100. Provide any supporting calculations.
    - b. Explain under what circumstances East Kentucky Midstream will waive the deposit.
    - c. Explain under what circumstances the deposit will be refunded to the customer.
    - d. Explain whether East Kentucky Midstream will pay interest on the deposit.
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### **Response**

- a. This amount is a continuation of the practice by EKM's predecessor. EKM did not consider changing the amount of the deposit at this time, and thinks the amount is appropriate because (1) the deposit is meant to secure payment of bills which are for gas already received and (2) monthly bills to a customer typically will exceed \$100 in at least one month each year.
- b. The proposed Tariff (Appl. Exh. B p.9/13), Original Sheet No. 4.4 (Rule 5.a) states that the deposit is "waivable by EKM." EKM intends to continue the practice of waiving the deposit on a new account/location for a pre-existing customer.
- c. EKM will refund a deposit to the customer after discontinuance of service if the customer has fully paid for service received prior to the discontinuance. In practice, customers often have the deposit applied to their last month's or other unpaid bills, and then any remaining amount from the deposit is refunded to them.
- d. If interest accrues on the account in which the deposit is held, the accrued interest will be refunded or credited along with the deposited amount as described in the response to subpart (c) above.



**Request**

5. Refer to the proposed tariff, PSC KY NO. 1, Original Sheet No. 4.5. Explain why a customer must take service for at least one year in order to qualify for the Budget Billing Plan.
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**Response**

Customer usage is seasonal and individualized. Without a full year of meter readings for a customer at a particular location, EKM cannot estimate a reasonable monthly budget plan amount for that customer.

## Request

6. Refer to the proposed tariff, PSC KY NO. 1, Original Sheet No. 4.6, in which East Kentucky Midstream states that customers shall pay any applicable reconnection fee for restoration of service. Provide the amount, if any, East Kentucky Midstream will charge for reconnection and provide detailed cost support for the charge and explain whether the labor associated with this service is already included in East Kentucky Midstream's calculation of its monthly customer and usage charges.
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## Response

EKM will continue its practice of charging a \$25.00 reconnection fee for restoration of service. This is the "any applicable Reconnection Fee" referenced in the proposed Tariff (Appl. Exh. B p.11/13), Original Sheet No. 4.6 (Rule 6.b), but labeled "Installation Fee" on Original Sheet No. 3.<sup>1</sup>

The cost support for a \$25 account activation fee for an initial or re-connection is discussed in the response to 1 PSC 02.a.1 about the "Installation Fee." As noted there, the labor and other costs associated with reconnection (or initiation) of service are included in the 2022 operating expenses from which the allocation to farm-tap service operations was made and used to support the proposed recurring charges.

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<sup>1</sup> The capitalized term "Reconnection Fee" is not otherwise used in the proposed Tariff, although there are references to reconnecting or restoring service. As noted in footnote 1 to the response to 1 PSC 02.a.1, the proposed Tariff provisions and phrasing about an "Installation Fee" do not clearly convey that the Fee is a charge for activating service, whether for a new service location or customer or for reconnecting service to an existing customer or location. EKM will work to clarify the proposed Tariff phrasing and submit revised or amended Tariff sheets as appropriate. This clarified Tariff language will keep the activation fee at the \$25.00 level and continue the practice of applying it to the initial connection and reconnection of gas service.

### **Request**

7. Refer to the proposed tariff, PSC KY NO. 1, Original Sheet No. 4.6. Explain why a customer who requests temporary disconnection of service and later requests restoration of service should possibly be required to pay the applicable customer charge for each month or part thereof that service was discontinued.
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### **Response**

If the proposed Tariff is approved, a customer who requests a temporary disconnection of service will be charged the applicable Seasonal/Temporary Disconnect charge (\$100) up-front, and will not be billed the customer charge for the seasonal/temporary disconnection period. *See* responses to 1 PSC 2.a.2 and 2.b.

However (if the proposed Tariff is approved), a customer who in effect obtains a temporary/seasonal disconnect by requesting only a disconnection of service and then, later, requesting a re-connection of service, may be required to pay the applicable customer charge for each month or part thereof that service was discontinued. The monthly customer charge contributes to the fixed and maintenance costs of the infrastructure serving that location, and the customer resuming service at the same location would be taking advantage of the continued existence of the infrastructure. In addition, a customer who was not up-front about a plan for a temporary disconnection might otherwise pay and contribute less than customers who forthrightly requested the seasonal/ temporary disconnect service or other customers who did not request disconnection during a period of little or no gas usage.

## Request

8. Refer to the Application, revised Exhibit D (filed June 29, 2023), cost support for the proposed rates.
    - a. Confirm that East Kentucky Midstream currently has, and expects to continue to have, 315 farm tap customers.
    - b. Confirm that East Kentucky Midstream expects sales volumes to farm tap customers to be 23,193 Mcf annually based on average monthly usage of 1,932.75 Mcf.
    - c. State whether East Kentucky Midstream has data from previous years of the acquired system indicating number of customers and annual Mcf usage. If so, provide the supporting documentation.
    - d. Provide calculations showing how East Kentucky Midstream derived the proposed monthly customer charges of \$11 and \$22 and the \$13 per Mcf volumetric rate. The calculation should include, but not be limited to, the gas cost inherent in the volumetric rate.
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## Response

- a. In the month of July 2023, EKM had 294 active farm-tap customer accounts.

In May and June 2022, the count for such customers was 315, but may have included inactive accounts; in other 2022 months, the count was below 300. Thus, 315 represents a maximum for farm-tap customers in the near future. Over time, EKM's farm-tap customer / account numbers have shown a slow decline. Account premises lose their inhabitants or tenants, become all-electric, or have shifted to Kentucky Frontier for gas supply.

- b. EKM has not developed projections of usage volumes for farm tap customers.

Volumes used by customers are chiefly a function of weather in the particular month, and vary significantly from the monthly average. In addition, "sales volumes" in the past have included a minimum bill of 1 Mcf, which represents a significant portion of billed amounts in warmer months. For example, in June 2022, the meter read was for

zero (0) or one (1) Mcf volume at three-quarters of EKM's farm-tap accounts, and the zero-reads were almost double those with one Mcf. Nonetheless, if active, each of those accounts was charged the minimum-bill amount of \$15.89.

Over the long term and apart from weather-related demand, EKM anticipates a decline in volumes to its farm-tap customers. First, account and customer account numbers are declining. Second, improvements to appliances and building insulation tend to reduce the demand for gas at any one location.

- c. EKM has data regarding the number of farm-tap customers and their monthly usage for at least some of the nine (9) months of 2021 after its acquisition of the system. Electronic files from that time period have been recovered and backed up and are being searched for responsive information; EKM will supplement this response when it has found data for all of the months or is reasonably certain that "missing" months will not be found. Under the circumstances, EKM cannot be sure that the 2021 data is reliable or internally consistent.

EKM does not have data or documentation about number of customers and annual Mcf usage from before its acquisition of the system.

- d. EKM has provided cost justification for the proposed recurring charges, but used the allocated subset of 2022 operating expenses and data about its gas costs as guidelines for (rather than strictly to derive) proposed rates that are (1) structurally different from the charges in place when it acquired the system and (2) are a first step in a transition to

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a customer charge that recovers the costs associated with serving a farm-tap residential or non-residential customer.

A customer charge plus a fixed volumetric charge for each Mcf metered is significantly different from the charge structure EKM has continued after its acquisition of the system in 2021. The legacy structure is to charge a “base” added to the varying *Inside FERC* TCo Appalachian Index for the month for each Mcf metered, with a 1 Mcf minimum bill for each month. As noted in Supplemental and Revised Application Exhibit D, p.3, recovery of the \$207,930.24 allocated to farm-tap service operations through a volumetric charge on the 2022 volumes metered for farm-tap customers (23,193 Mcf), would require a \$8.97 per Mcf “base” charge. This is significantly more than the \$6.75/Mcf “base” currently charged for usage, and so would be a step in the wrong direction from better aligning the structure of charges and costs.

On the other hand, recovery of all of the operations expenses allocated (\$207,930.24) through a fixed monthly charge on 315 farm-tap customers would require a customer charge of \$55.01 per month. As noted before (Supp./Rev’d Appl. Exh. D, pp.2-3), for many of EKM’s farm-tap customers, this alone is more than any of the monthly bills received in 2022; at that level, EKM considered the charge to be inequitable and likely to produce rate shock for its mostly residential farm-tap customer population.

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Considering all factors and other guidelines,<sup>1</sup> and repeating the calculations with various customer charges, EKM selected a residential customer charge of \$11.00 per month. The non-residential customer charge was then set at double the residential customer charge (\$22.00/month), based on perceived patterns of usage and specific needs among those EKM identified as non-residential users.

With 305 residential and 10 non-residential farm-tap customers, a year of the proposed customer charges would yield \$42,900.00. That would leave \$165,030.24 (\$207,930.24 - \$42,900.00) in allocated operating expenses to be recovered through the usage (volumetric) charge. This implies a \$7.12/Mcf “base rate” over the 23,193 Mcf metered for farm-tap customers in 2022 ( $\$165,030.24 \div 23,193 \text{ Mcf}$ ). From those calculations, the gas cost inherent in the propose volumetric rate is \$5.88/Mcf.<sup>2</sup>

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<sup>1</sup> These included (a) the effects of competition from other suppliers and forms of energy and (b) meeting one of the benchmarks for reasonableness set out in 807 KAR 5:026 § 9(1)(a).

<sup>2</sup> See Supp./Rev'd Appl. Exh. D, p.3, for a different perspective and calculation yielding the same \$5.88 per Mcf amount.

## Request

9. Refer to the Application, revised Exhibit D, cost support for the proposed rates, pages 2-4.
    - a. Explain how East Kentucky Midstream derived the blended, weighted allocator to farm-tap service operations of 0.153. Include in the explanation the specific allocators and allocation factors for each account.
    - b. Provide the total 2022 expenses by month.
    - c. Explain whether East Kentucky Midstream proposes to use an operating ratio to determine reasonable margins from base rates. If not, explain how East Kentucky Midstream determined the appropriate margins for base rates.
    - d. Explain what kind of insurance is recorded in account “6330 Insurance Expense.”
    - e. Confirm that “68405 Taxes” are income taxes. If this cannot be confirmed, explain the kind of taxes.
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## Response

- a. Supplemental and Revised Application Exhibit D, p.2, states: “The overall allocator to farm-tap service operations for these [16 expense] categories in 2022 is 0.153, which yields a (partial) operating expense for those operations of \$ 207,930.24.” The overall allocator for 2022 is a weighted average, but not of individualized allocation factors for the 16 accounts. Monthly allocators ranging between 0.098 and 0.233 for 2022 (see table below) are the ratio of volumes delivered to farm-tap customers in that month to the total volumes delivered to farm-tap customers plus wholesale customers (City of West Liberty and Kentucky Frontier). Because this ratio is lower than the ratio of farm-tap customer/meter numbers to total customers/meters, this is a conservative allocator that is likely to underestimate the proportion of the expenses attributable to farm-tap service.

The monthly allocator is applied to the total expenses from the 16 categories for that month (see monthly amounts provided in response to 1 PSC 9.b) to generate an allocated



farm-tap expense for the month. The summed allocated expenses (\$207,930.24) are then divided by the summed total expenses (\$1,362,558.22), to derive an overall 2022 allocator of 0.153.<sup>1</sup>

Month	Allocator	Expenses	Allocated Exp.
Jan. 22	0.114	85,460.00	9,742.44
Feb. 22	0.233	57,506.49	13,399.01
Mar. 22	0.180	63,771.82	11,478.93
April 22	0.232	67,515.83	15,663.67
May 22	0.175	82,148.31	14,375.95
June 22	0.191	220,486.60	42,112.94
July 22	0.141	69,020.21	9,731.85
Aug. 22	0.107	76,539.81	8,189.76
Sept. 22	0.098	66,911.99	6,557.38
Oct. 22	0.117	114,890.20	13,442.15
Nov. 22	0.140	387,013.25	54,181.86
Dec. 22	0.127	71,293.71	9,054.30
<b>CY 2022</b>	<b>0.153</b>	<b>1,362,558.22</b>	<b>207,930.24</b>

- b. A table providing the 2022 expenses by month — expanding the table on page 2 of the Supplemental and Revised Application Exhibit D — is attached at the back of this response.
- c. Use of an operating ratio to determine reasonable margins from base rates would be appropriate. EKM understands that the PSC routinely uses a 0.88 operating ratio — of expenses, including depreciation and taxes, to gross revenues — in utility alternative

<sup>1</sup> The simple (unweighted) average of the 2022 monthly allocators is 0.155.

rate filing (ARF) cases.<sup>2</sup> A lower operating ratio would be appropriate in this case because the subset of operating expenses that EKM has used to support its proposed rates does not include depreciation or income taxes. Please note that EKM has proposed rates that do not include a “base rate” and did not propose the rates with an expectation that they would generate a margin above the subset of operating expenses.

- d. The insurance recorded in account “6330 Insurance” is General Liability and Umbrella insurance.
- e. The “68405 Taxes” are not income taxes. The taxes included are:
- Property tax
  - School tax

The school tax is a “utility gross receipts license tax” assessed by some of the school districts in counties where EKM furnishes farm tap service. These assessments are included on the respective customer’s bill. *See* proposed Tariff (Appl. Exh. B), Original Sheet No. 4.5 (Rule 5.c).

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<sup>2</sup> *See, e.g.*, ARF Form 1 - Attachment RR-OR - Revenue Requirement Calculation Form - Operating Ratio Method; *Valley Gas, Inc.*, 2022-00315 Final Order entered Aug. 18, 2023, p.16 & n.26; *Kentucky-American Water Co., Inc.* (sewage service), 2021-00434 Final Order entered Sep. 2, 2022, p.19.

**Ky. PSC No. 2023-00112**  
**Attachment for**  
**Response to I PSC 9.b**

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2022 by month

	2022 Total	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	
5200	Wages	322,899.20	32,272.50	25,405.30	26,138.55	28,449.50	34,928.95	25,156.05	30,309.65	24,275.70	24,235.45	21,975.85	27,661.70	22,090.00
5210	Workers Comp	18,565.15	1,855.65	1,460.60	1,502.81	1,635.69	2,008.22	1,446.34	1,742.64	1,395.74	1,393.50	1,263.49	1,590.37	1,270.10
5215	Payroll Taxes	26,547.72	3,369.49	2,495.68	2,247.17	2,106.49	2,747.41	1,982.87	2,394.84	1,962.06	1,754.55	1,681.16	2,116.12	1,689.88
60200	Automobile Expense	119,746.25	9,104.72	9,104.72	9,104.72	9,211.19	10,979.03	11,113.31	9,104.72	10,111.22	10,959.64	11,741.37	9,519.51	9,692.10
6040	Credit Card Fees	404.40	29.95	29.95	29.95	29.95	29.95	29.95	39.95	39.95	39.95	24.95	39.95	39.95
61700	Computer / Internet Expenses	2,382.87	0.00	0.00	0.00	609.50	0.00	107.45	146.60	146.60	101.20	131.20	533.61	606.71
6330	Insurance Expense	26,505.95	20,947.86	513.36	513.36	513.36	513.36	0.00	203.60	741.65	639.85	639.85	639.85	639.85
6331	Health Insurance	79,258.76	6,451.22	6,451.22	6,451.22	6,451.22	7,147.41	5,242.71	6,072.56	6,177.56	6,177.56	6,177.56	6,177.56	10,007.30
64300	Meals and Entertainment	58.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	58.01	0.00	0.00	0.00
64900	Office Supplies	4,038.60	148.44	183.22	147.91	147.29	273.47	329.40	731.07	533.17	580.17	151.20	177.88	635.38
66700	Professional Fees	107,569.74	0.00	0.00	0.00	0.00	6,900.00	6,075.00	6,112.50	4,190.68	43,908.74	27,295.32	10,725.00	
67201	Pipeline repairs	525,719.66	387.41	2,583.69	5,594.75	7,973.91	6,295.74	155,449.91	7,501.05	15,138.03	6,745.16	16,412.15	298,885.88	2,751.98
67205	Vehicle	85,855.44	7,154.62	7,154.62	7,154.62	7,154.62	7,154.62	7,154.62	7,154.62	7,154.62	7,154.62	7,154.62	7,154.62	7,154.62
68100	Telephone Expense	4,425.93	321.36	237.84	436.96	310.77	552.00	656.24	212.27	465.08	215.55	143.53	641.81	232.52
68405	Taxes	13,184.56	1,183.85	1,140.37	1,364.19	1,145.00	2,566.23	628.73	428.80	705.65	2,706.21	0.00	1,315.53	
68600	Utilities	25,395.98	2,232.93	745.92	3,085.61	1,777.34	748.11	3,209.32	1,873.99	1,962.13	1,960.45	778.32	4,579.07	2,442.79
	TOTAL	1,362,558.22	85,460.00	57,506.49	63,771.82	67,515.83	82,148.31	220,486.60	69,020.21	76,539.81	66,911.99	114,890.20	387,013.25	71,293.71

**Request**

10. State whether East Kentucky Midstream serves or expects to serve any “free gas” customers who receive gas in exchange for pipeline crossing their property. If so, provide the number and average annual usage for these customers.
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**Response**

EKM does not provide “free gas” to any customers in exchange for pipeline crossing their property, and does not expect to provide such gas in the future.

**Request**

11. Describe the source of the gas delivered to East Kentucky Midstream’s farm tap customers.

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**Response** (includes the response to 1 PSC 18):

Gas delivered to EKM’s farm-tap customers and other (wholesale) customers supplied from the gathering system is primarily producer gas gathered on EKM’s system. Producer gas is counted as first through the meter for farm-tap and wholesale customers. For the period January 2022 – March 2023, the monthly receipts of producer gas into EKM’s gathering system have exceeded the monthly deliveries to its farm-tap customers. EKM obtains gas from the following producers:

<b><u>Meter No.</u></b>	<b><u>Producer</u></b>
A165	Apex Gas LLC
A166	Apex Gas LLC #2
A167	Apex Gas LLC #3
A550	Arnett Acres
B390	Burning Fork LLC
C540	C&P Energy
A222	County Line Resources
N165	Diversified Energy
H185	Hard Rock Energy
H252	Hays Exploration
C180	HTC Gas Company
K390	Ky River Energy, LLC
L300	Lakeview Gathering System
Roy 90	Lawrence County Gas
Roy 92	Levi Oil & Gas
Roy 17	Mary Anne Johnson
M350	MBM Production, LLC
M355	Middle Fork Gas
C159	Primrose Oil LLC
K200	Quality Natural Gas
Roy 97	Roberts Resources

<u>Meter No.</u>	<u>Producer</u>
N250	Spirit Energy
S285	Stinson Creek LLC
Roy 80	Tackett & Sons
Roy 100	Thealka Gas
K117, Roy 18, T200	Troublesome Creek Gas

When customer demand exceeds producer gas supply, mostly in the winter months, additional gas supplies are obtained from Columbia Gas Transmission Company (TCO) through Southern Energy, LLC, a marketer. This “second-through-the meter” gas is delivered at TCO’s Means Measuring Station near the Menifee-Montgomery county line. The price to EKM from both the producers and Southern Energy is at or above the *Inside FERC* TCO Appalachian Index.

**Request**

12. State whether all 315 customers that East Kentucky Midstream serves as farm tap customers are served from gathering lines or transmission lines carrying gas beyond their properties for sale to the wholesale market.
- 

**Response**

All of EKM's farm-tap customers are served from taps on such lines.

**Request**

13. Confirm that East Kentucky Midstream only provides service to the owners of property on or over which any producing well or gas gathering pipeline is located, or the owners of real estate whose property and point of desired service is located within one half air-mile of East Kentucky Midstream producing gas well or gas gathering pipeline. If this cannot be confirmed, provide the number of customers that are not served pursuant to KRS 278.485.
- 

**Response**

EKM provides farm tap service only to points of service (a) on property on or over which any producing well or gas gathering pipeline is located or (b) located within one half air-mile of any EKM producing gas well or gas gathering pipeline. The owners of property at such points of service are not necessarily the users of the gas service.



**Request**

14. Explain whether East Kentucky Midstream has plans to disconnect any customers that are not served pursuant to KRS 278.485.
- 

**Response**

EKM has no such plans.

**Request**

15. Explain whether existing farm taps have been extended or divided to provide service to more than one customer per farm tap. If so, include supporting documentation.

---

**Response**

Since EKM's acquisition of the system in early 2021, EKM has not extended or divided existing farm taps to provide service to more than one customer per farm tap.

**Request**

16. Explain whether East Kentucky Midstream employs anyone in its service territory to respond to emergencies. If not, explain how East Kentucky Midstream responds to emergencies.
- 

**Response**

Yes, EKM has employees that are available to respond to emergencies as necessary.

## Request

17. Provide a system map or maps that show East Kentucky Midstream's natural gas system, including the location, size, category, and material of lines and the location of producing wells.

---

## Response

EKM provides maps and diagrams attached hereto (EKM-0001 to 0017), as well as topographic maps (EKM-0018 to 0064) which have been provided entirely under seal with a concurrent motion for confidential treatment.<sup>1</sup> These consist of 64 one-page diagrams / maps, designated as follows:

### **Maps and Diagrams (attached hereto)**

<b>EKM-</b>	<b>Description</b>
0001	Pipeline Segments
0002	A-1 Line
0003	A-2 Line
0004	A-3 Line
0005	A-4 Line
0006	A-5 Line
0007	C-Line
0008	J Line
0009	KZ East
0010	KZ West
0011	Jefferson Gas Wells and Lines
0012	A-1 Line Meters and Regulators
0013	A-2 Line Meters and Regulators
0014	A-3 Meters and Regulators
0015	A-4 Meters and Regulators
0016	A-5 Meters and Regulators
0017	C-Line Meters and Regulators

---

<sup>1</sup> These were also produced in the same manner in Ky. PSC Case No. 2022-00238 and are the totality of the maps that EKM has been able to locate within its care, custody and control.

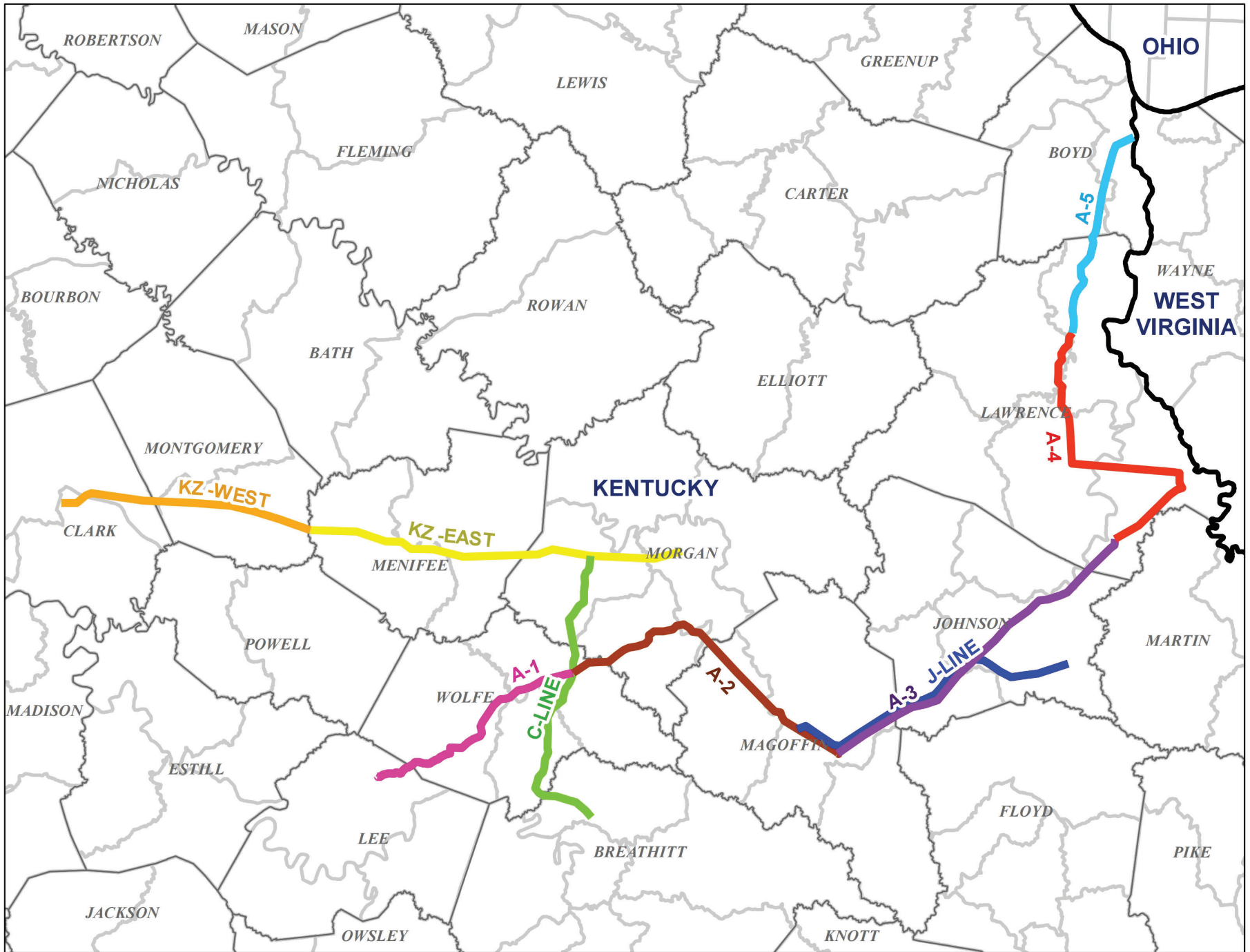
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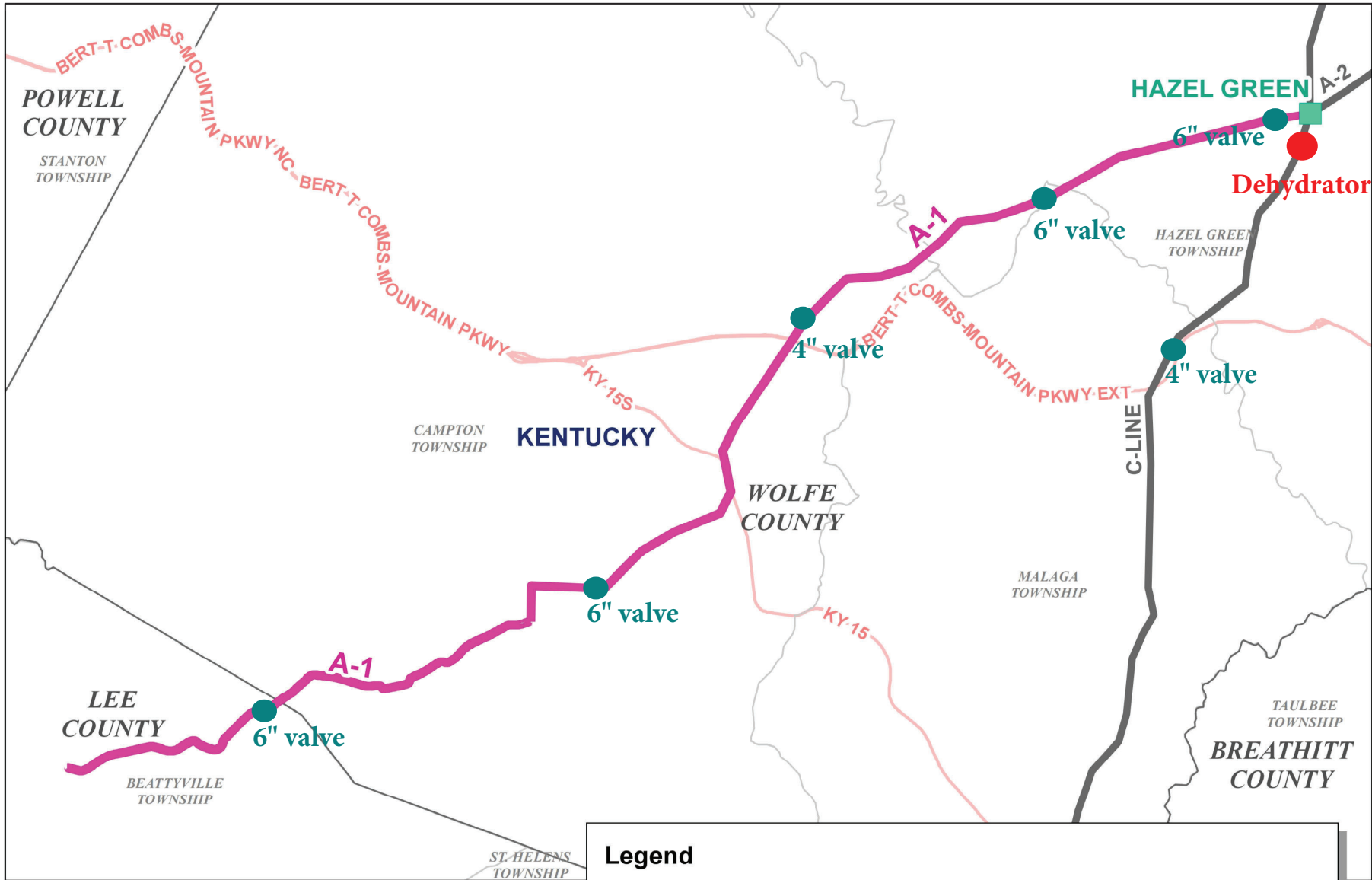
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**Topographic Quadrangle Maps (provided under seal)**

<b>EKM-</b>	<b>Quadrangle</b>
0018	Zachariah
0019	Campton
0020	Pomeroyton
0021	Hazel Green
0022	Cannel City
0023	White Oak
0024	Salyersville South
0025	Ivyton
0026	Paintsville
0027	Offutt
0028	Richardson
0029	Milo
0030	Louisa
0031	Adams
0032	Fallsburg
0033	Boltsfork
0034	Burnaugh
0035-38	<i>(Quadrangle not listed)</i>
0035	Cover – Capital Oil Company, Map of Gas Transmission Line
0036	Wolfe-Breathitt County
0037	Morgan-Wolfe County
0038	Menifee-Morgan County
0039	West Liberty
0040	Sideview
0041	Scranton
0042	Pomeroyton
0043	Means
0044	Levee
0045	Hedges
0046	Frenchburg
0047	Austerlitz
0048-49	Cole Road
0050	Stoner Creek
0051	Pilot View

<b>EKM-</b>	<b>Quadrangle</b>
0052-53	Combs Branch
0054	Hollywood Springs
0055-56	Levee
0057-58	Welch Knob
0059	Jeffersonville
0060	Horselick Knob
0061-62	Sand Mountain
0063-64	Means





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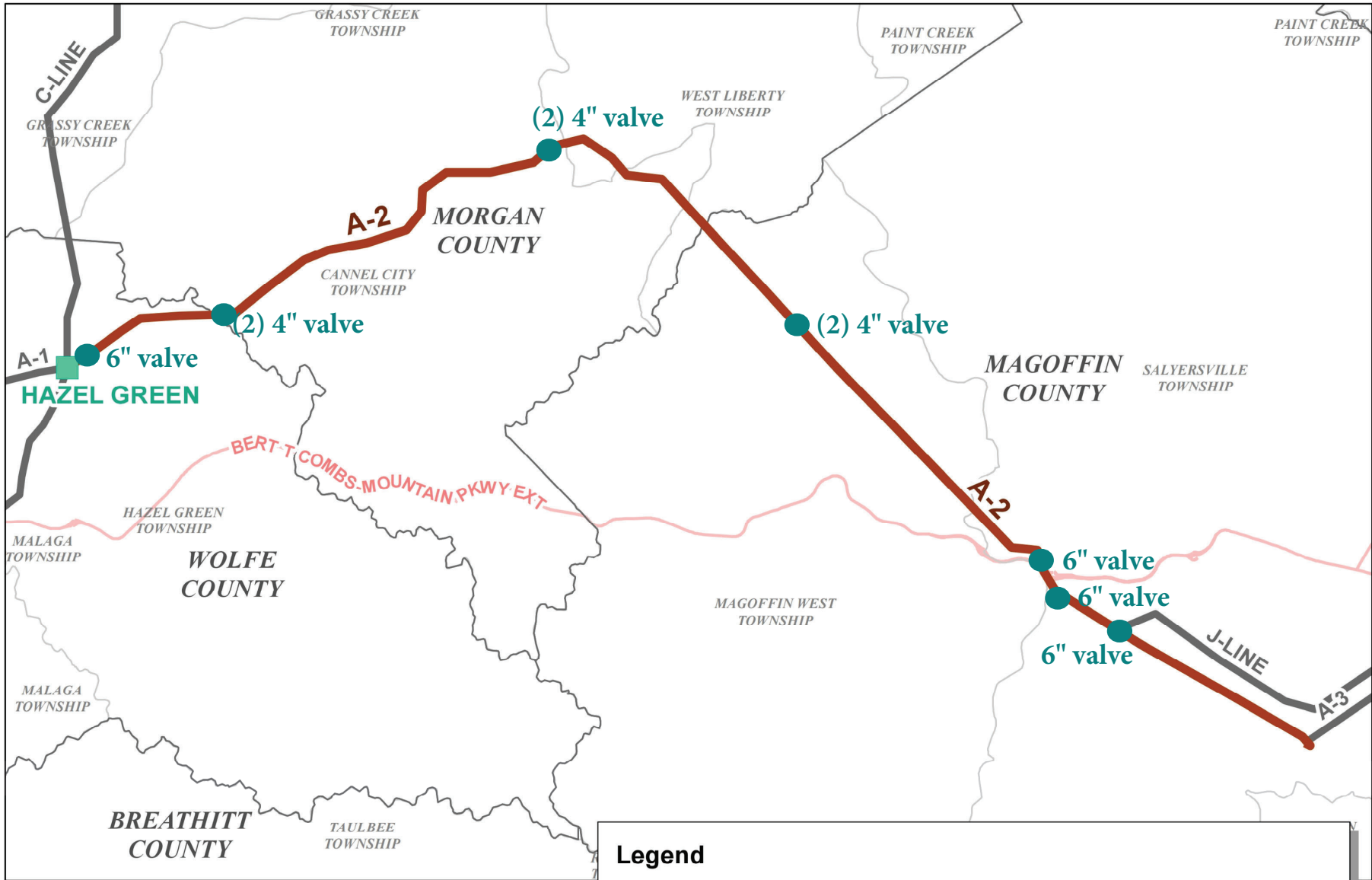
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**Legend**

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 A-2 LINE	 A-5 LINE	 KZ -EAST	 NATURAL GAS PROCESSING PLANTS	 COUNTY
 A-3 LINE	 C-LINE	 KZ -WEST	 REFINERY	 TOWNSHIP
 MAJOR PIPELINES				 HIGHWAY

 1 Miles



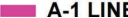
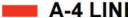
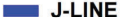


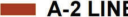
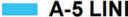



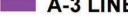
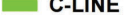








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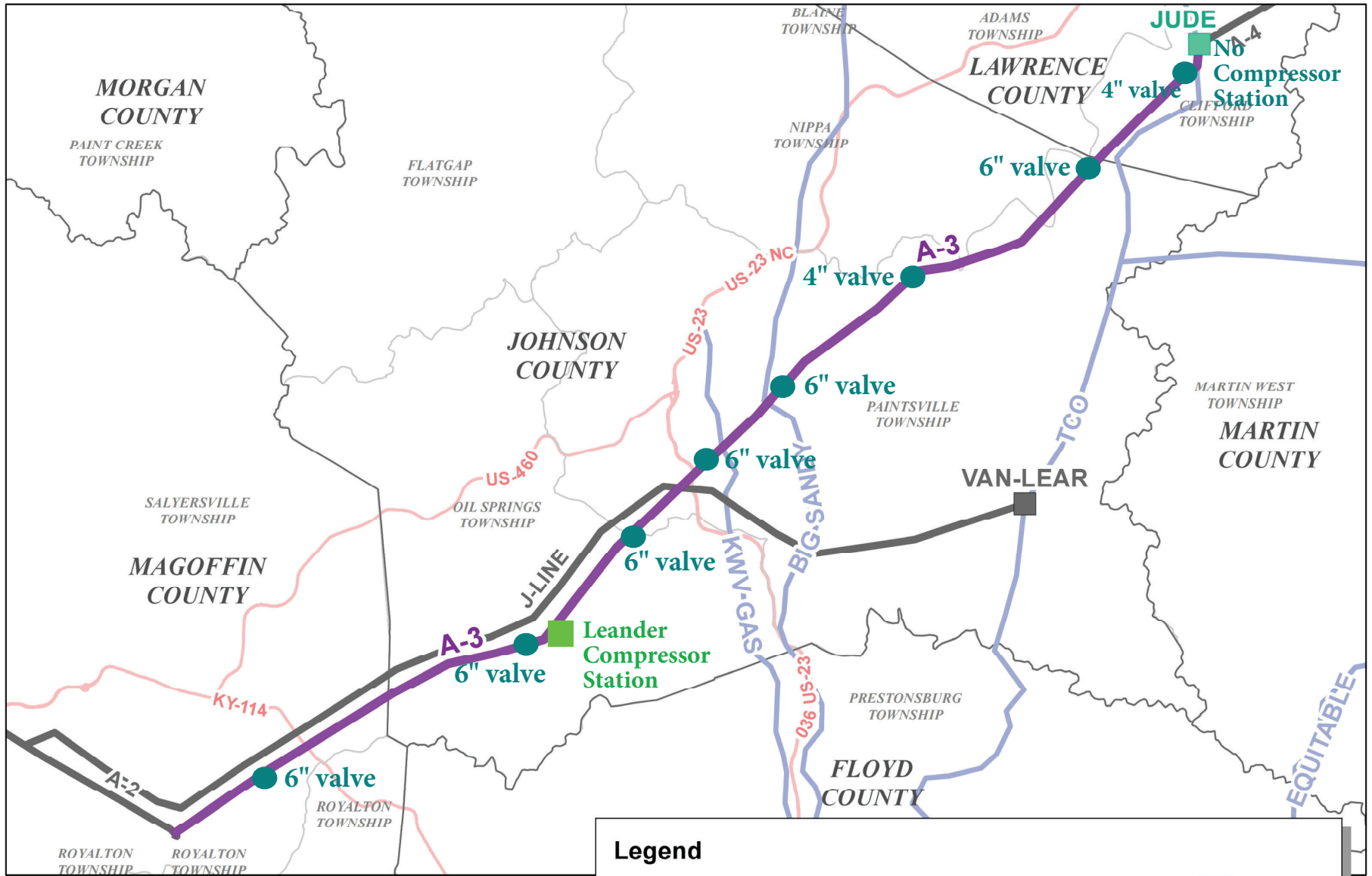
  
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**Date: 11/25/2019**

**Legend**

 A-1 LINE	 A-4 LINE	 J-LINE	 COMPRESSOR SITES	 STATE
 A-2 LINE	 A-5 LINE	 KZ -EAST	 NATURAL GAS PROCESSING PLANTS	 COUNTY
 A-3 LINE	 C-LINE	 KZ -WEST	 REFINERY	 TOWNSHIP
 MAJOR PIPELINES				 HIGHWAY

 1 Miles



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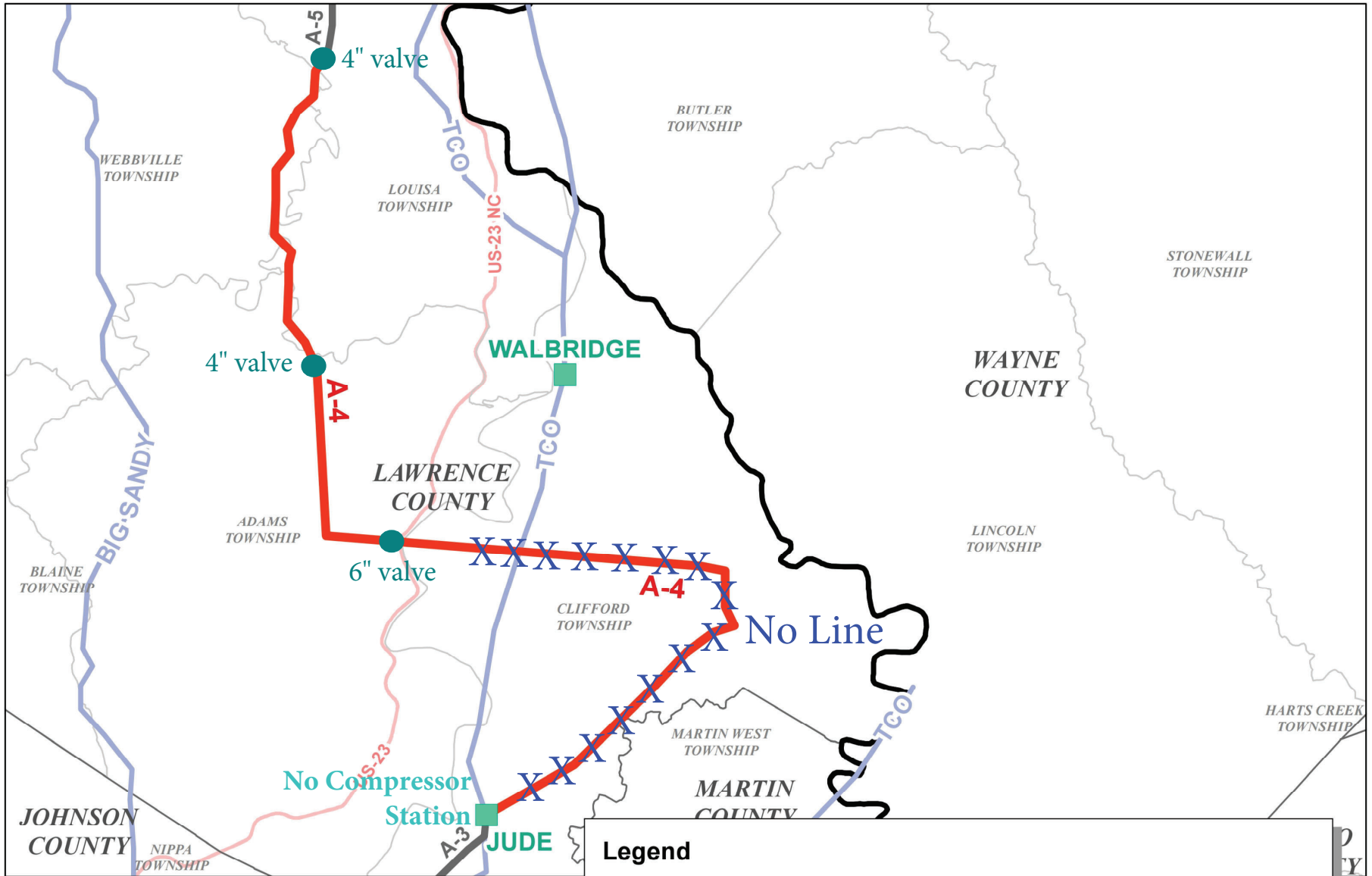


Date: 11/25/2019

### Legend

A-1 LINE	A-4 LINE	J-LINE	COMPRESSOR SITES	STATE
A-2 LINE	A-5 LINE	KZ -EAST	NATURAL GAS PROCESSING PLANTS	COUNTY
A-3 LINE	C-LINE	KZ -WEST	REFINERY	TOWNSHIP
		MAJOR PIPELINES		HIGHWAY

1 Miles



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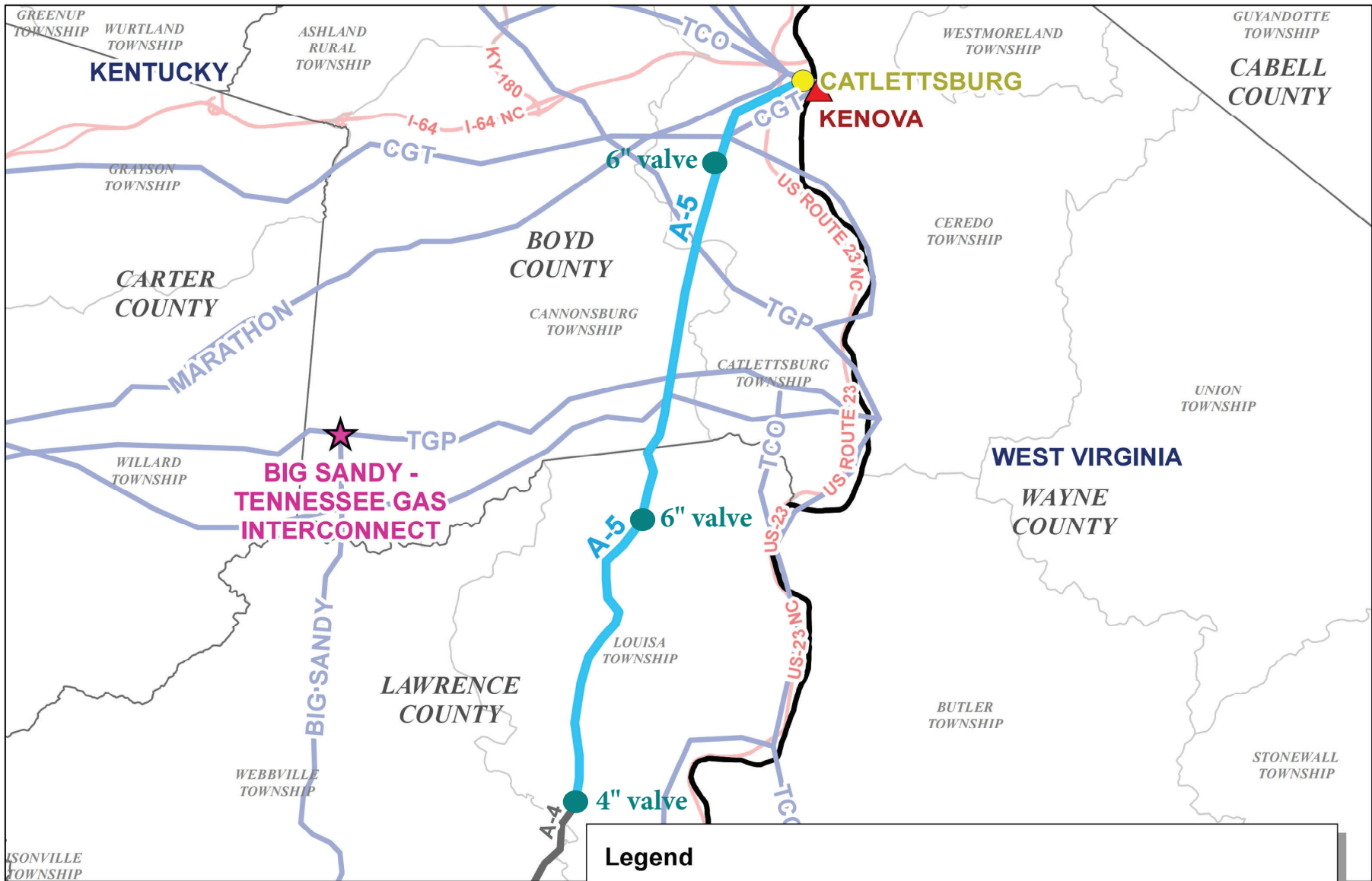
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		MAJOR PIPELINES		HIGHWAY

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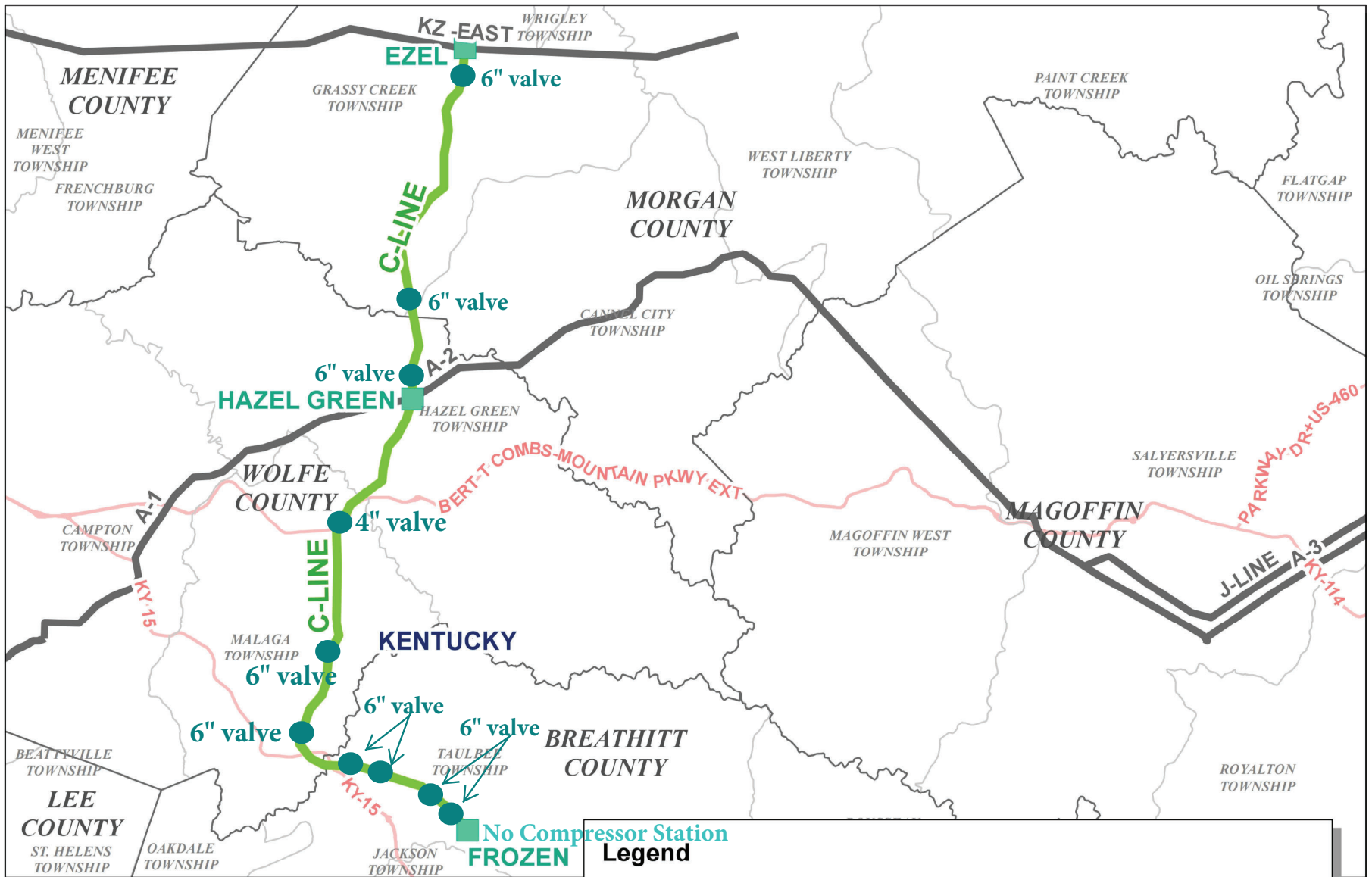


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A-2 LINE	A-5 LINE	KZ -EAST	NATURAL GAS PROCESSING PLANTS	COUNTY
A-3 LINE	C-LINE	KZ -WEST	REFINERY	TOWNSHIP
	MAJOR PIPELINES			HIGHWAY

1 Miles




















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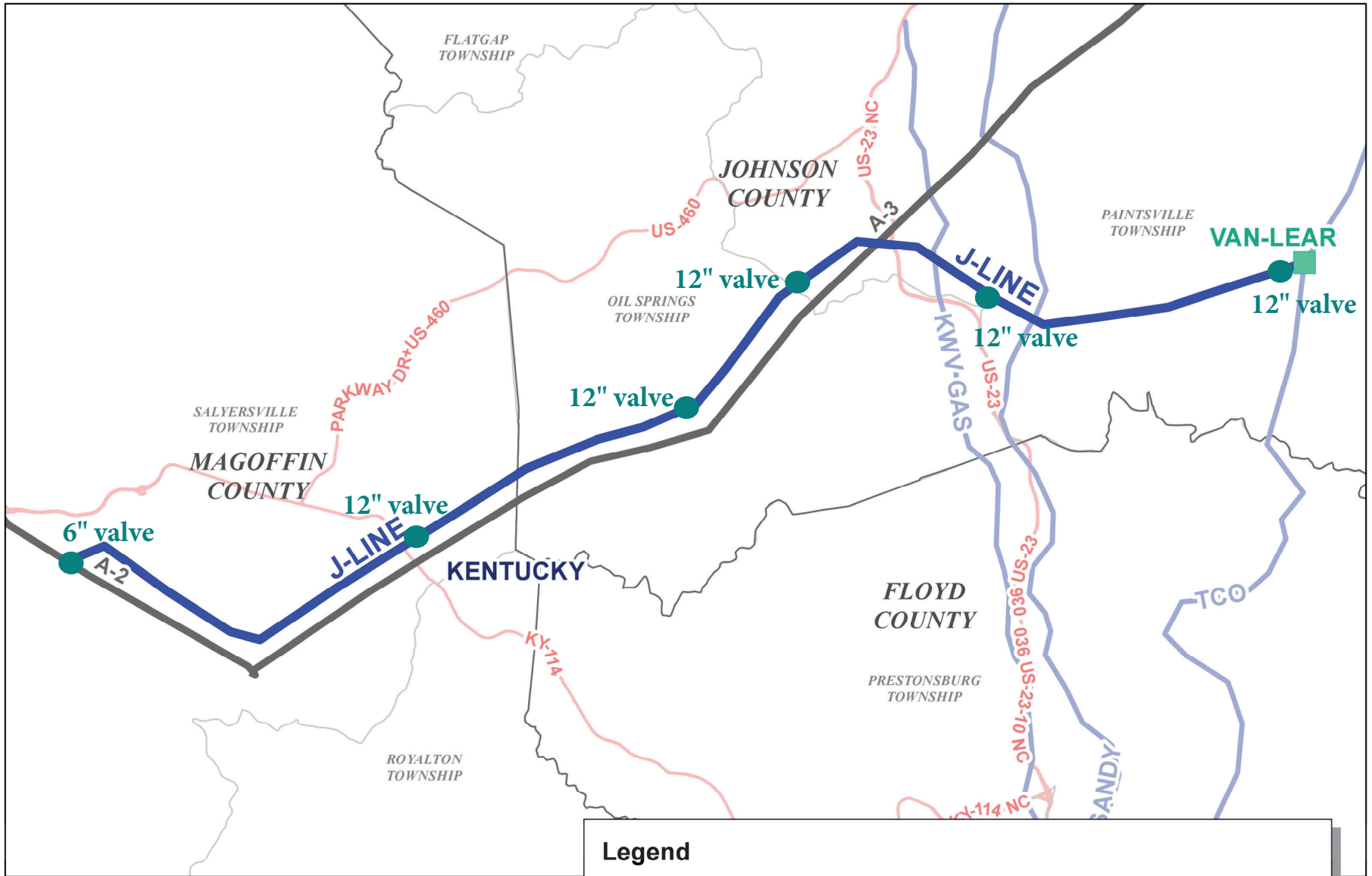


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 A-2 LINE	 A-5 LINE	 KZ -EAST	 NATURAL GAS PROCESSING PLANTS	 COUNTY
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		 MAJOR PIPELINES		 HIGHWAY

 1 Miles



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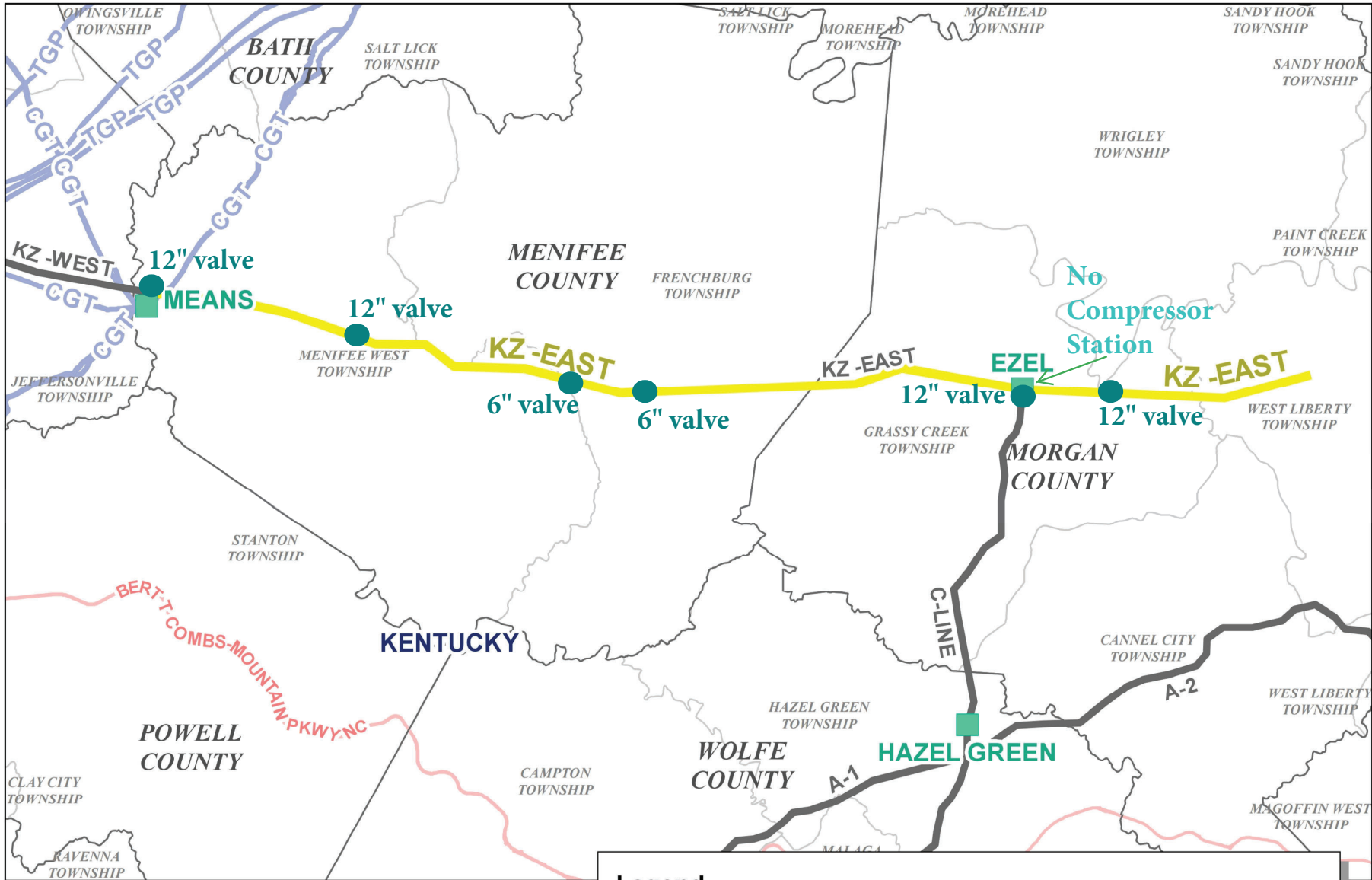


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A-2 LINE	A-5 LINE	KZ -EAST	NATURAL GAS PROCESSING PLANTS	COUNTY
A-3 LINE	C-LINE	KZ -WEST	REFINERY	TOWNSHIP
		MAJOR PIPELINES		HIGHWAY

1 Miles




















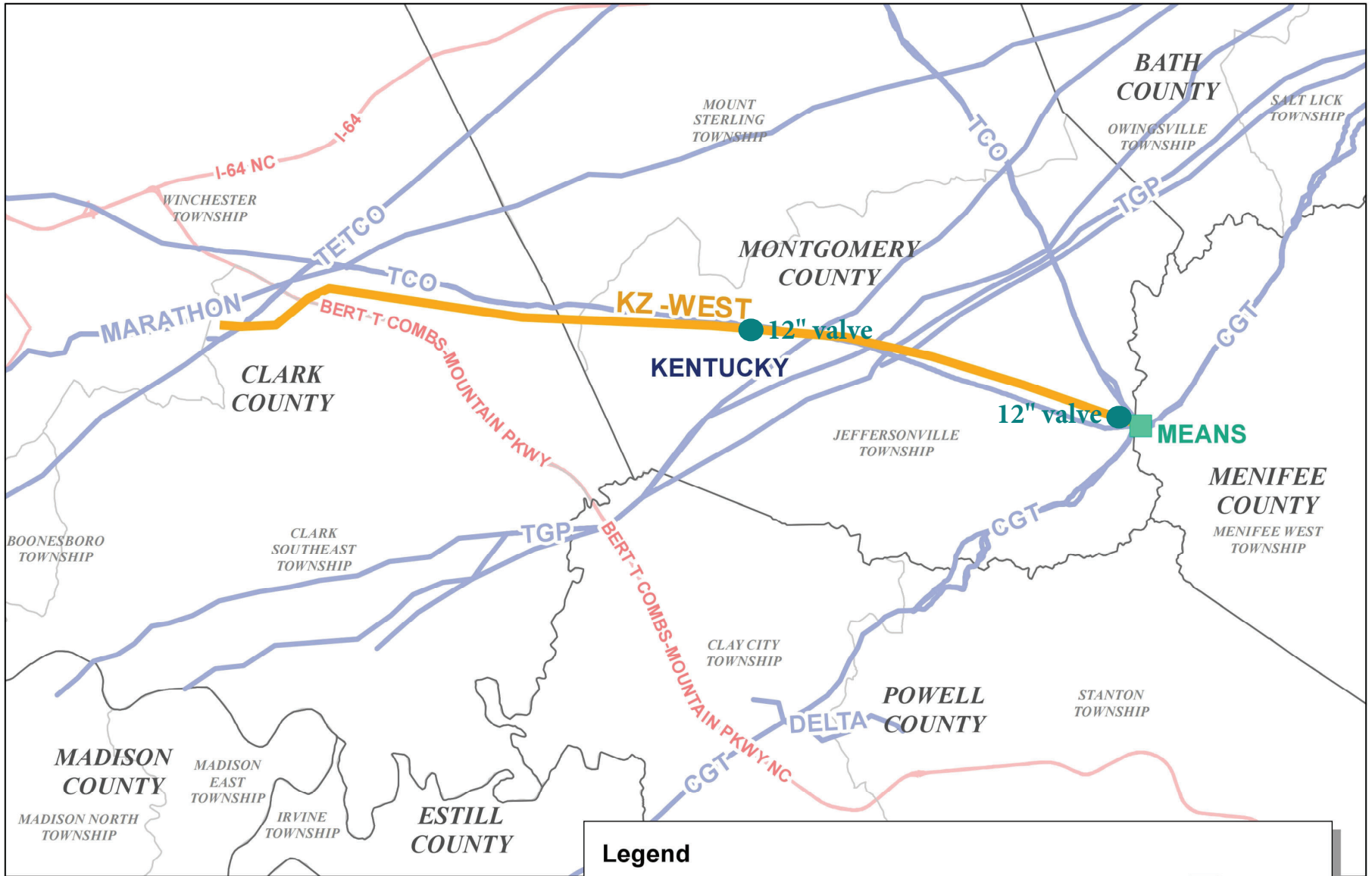
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**Legend**

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 A-2 LINE	 A-5 LINE	 KZ -EAST	 COMPRESSOR SITES	 COUNTY
 A-3 LINE	 C-LINE	 KZ -WEST	 NATURAL GAS PROCESSING PLANTS	 TOWNSHIP
 Miles			 HIGHWAY	



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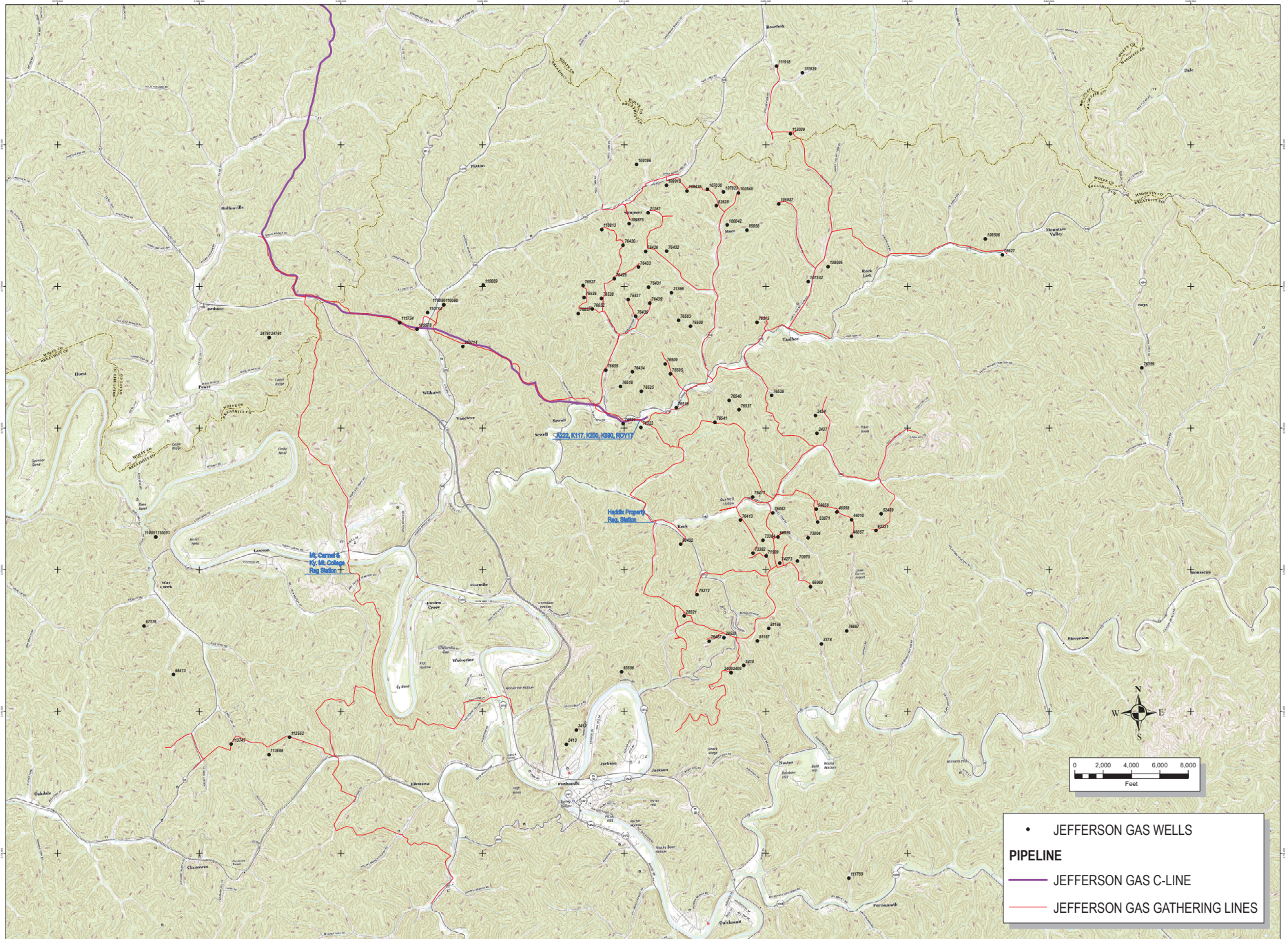
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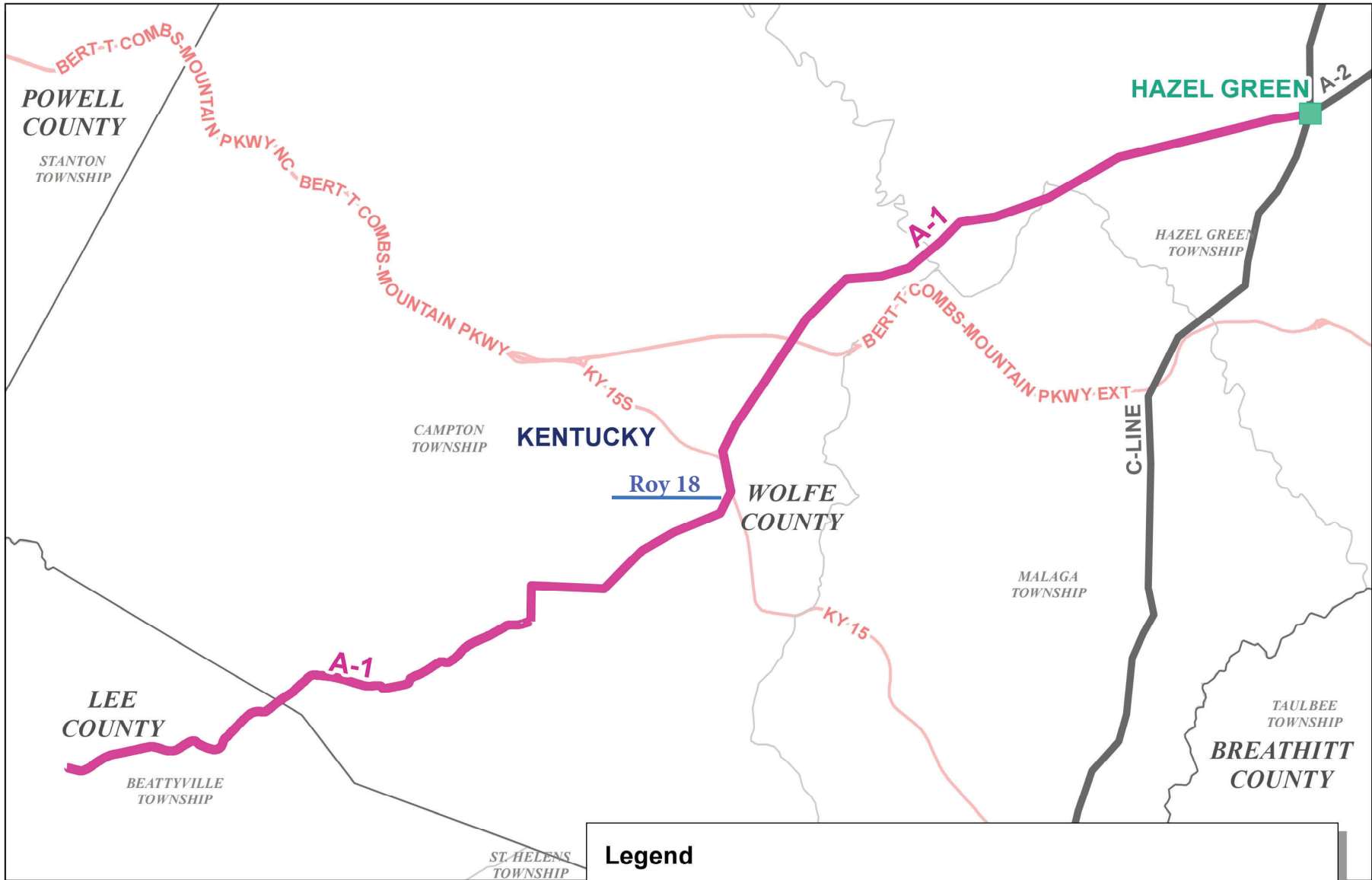
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 A-2 LINE	 A-5 LINE	 KZ -EAST	 NATURAL GAS PROCESSING PLANTS	 COUNTY
 A-3 LINE	 C-LINE	 KZ -WEST	 REFINERY	 TOWNSHIP
		 MAJOR PIPELINES		 HIGHWAY


























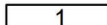
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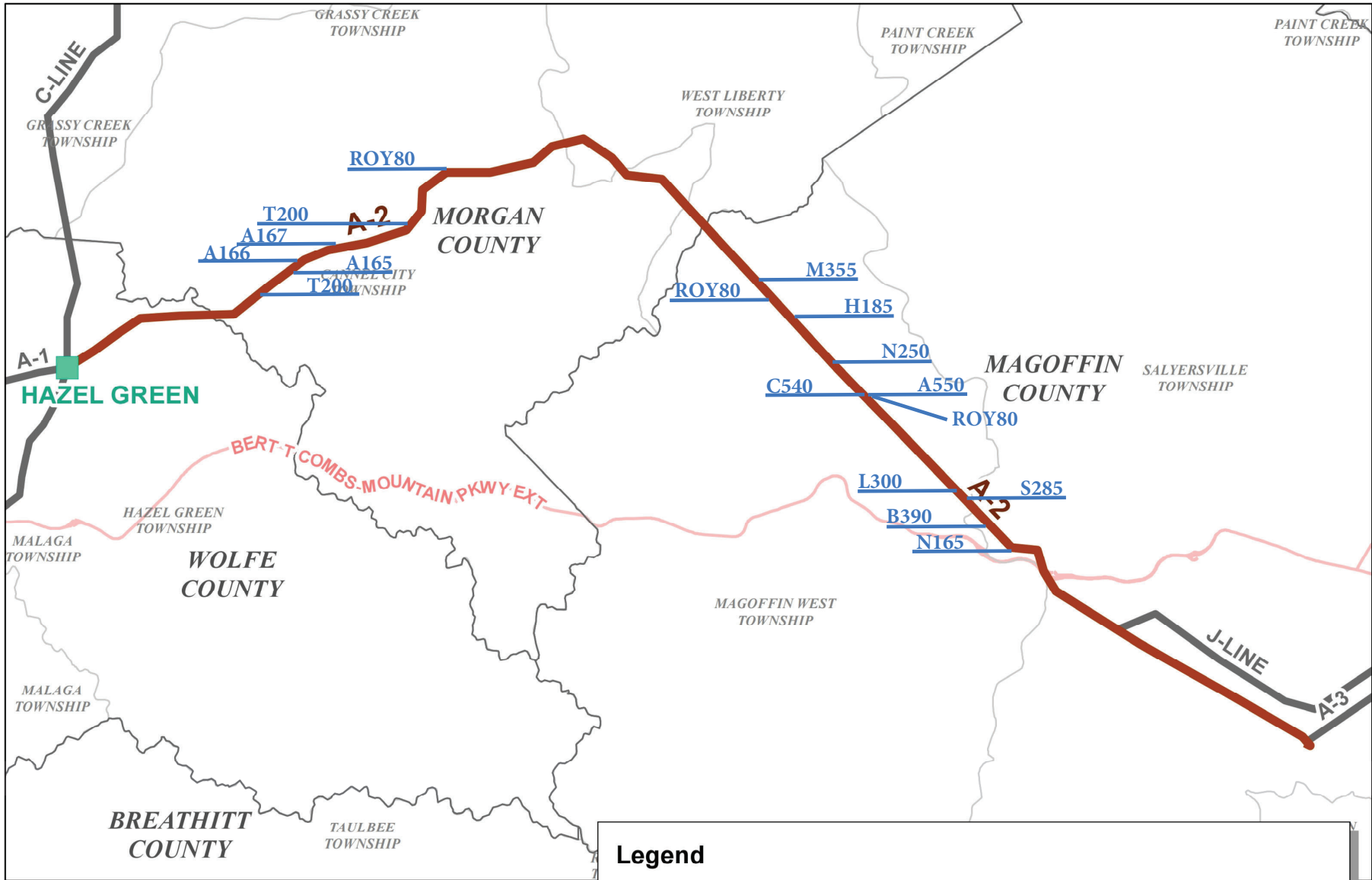
  
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**Legend**

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 A-2 LINE	 A-5 LINE	 KZ -EAST	 NATURAL GAS PROCESSING PLANTS	 COUNTY
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 MAJOR PIPELINES				 HIGHWAY

 1 Miles



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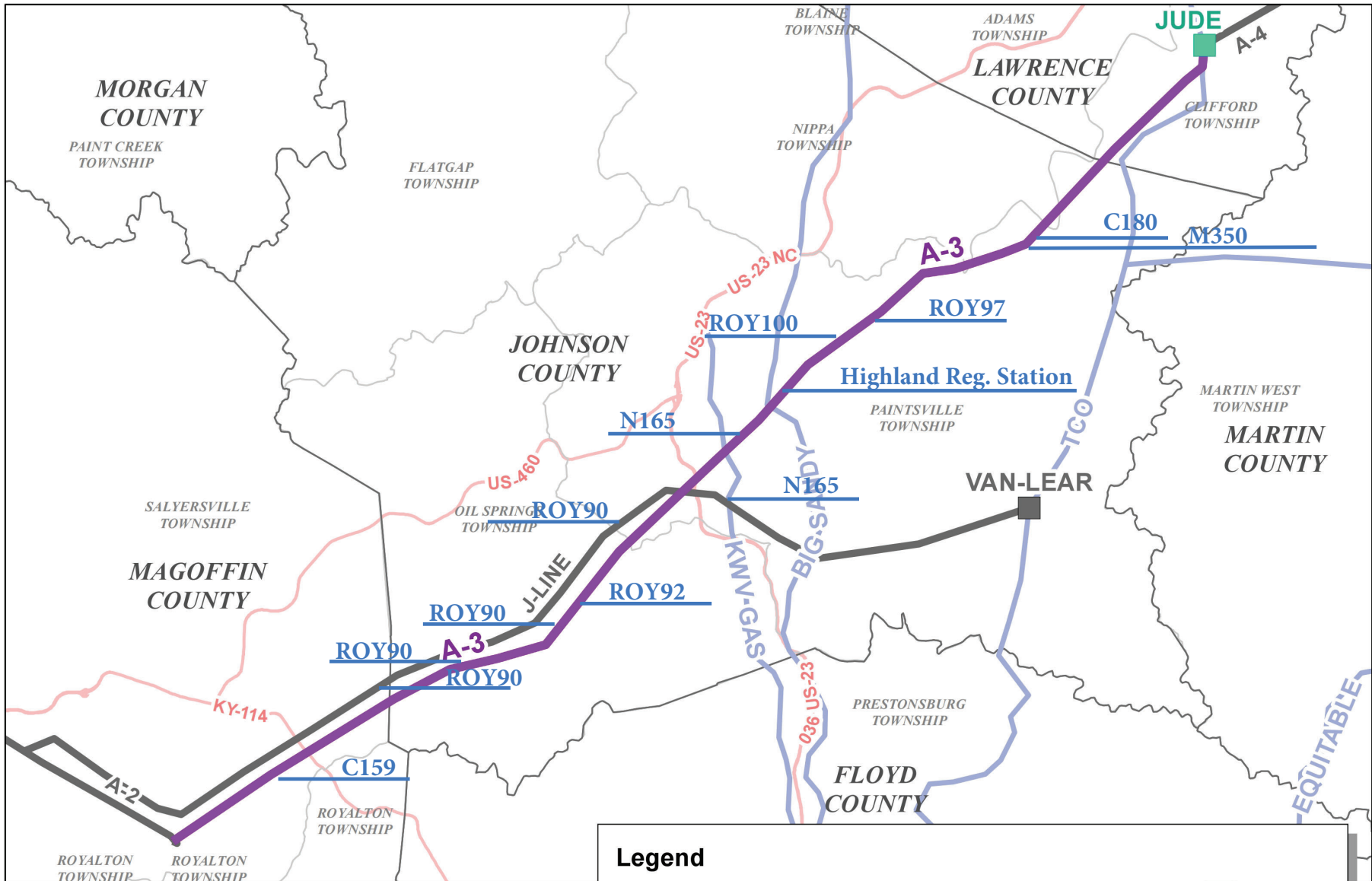
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	MAJOR PIPELINES			HIGHWAY

1 Miles



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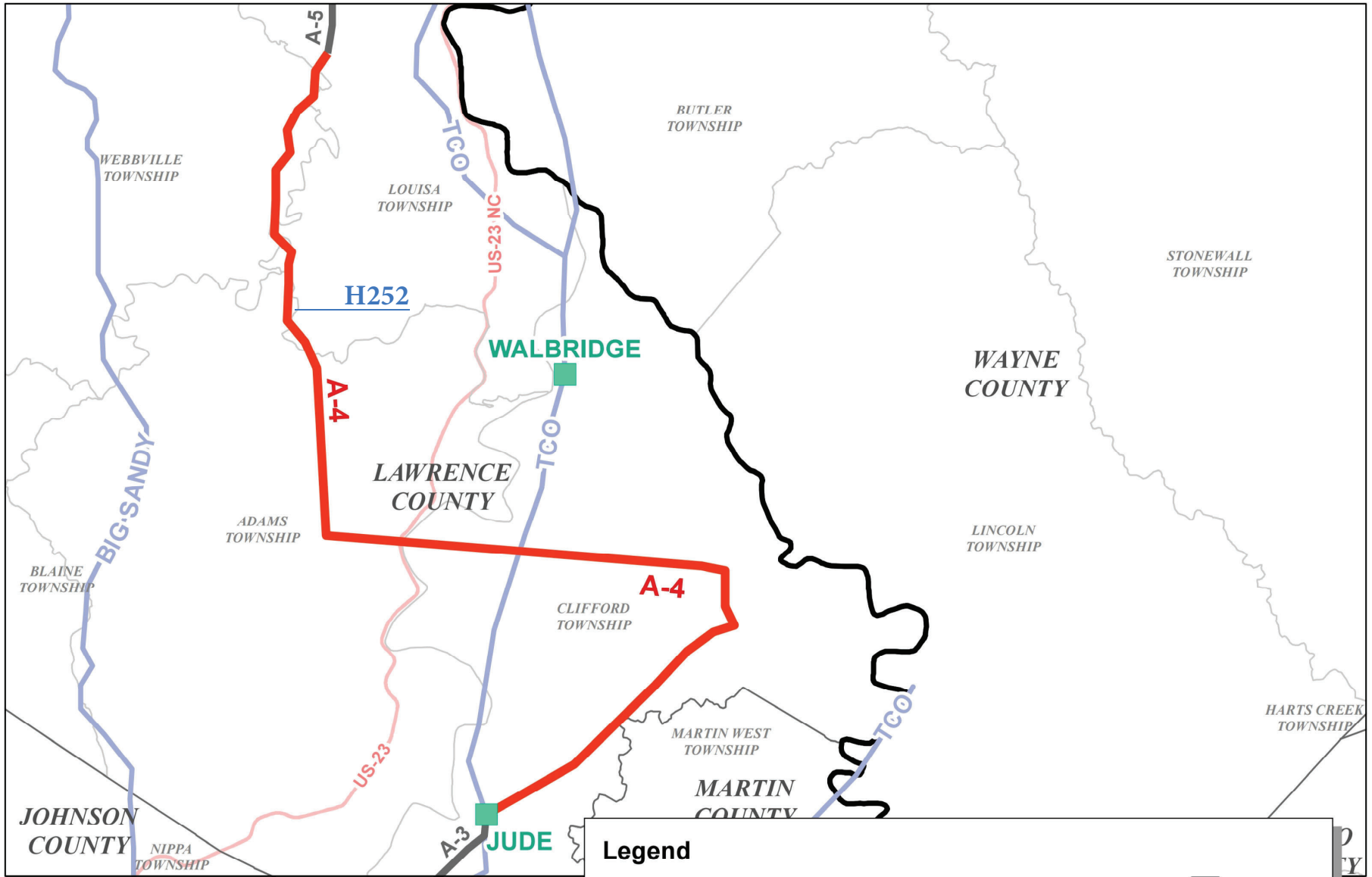


Date: 11/25/2019

### Legend

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		MAJOR PIPELINES		HIGHWAY

1 Miles





















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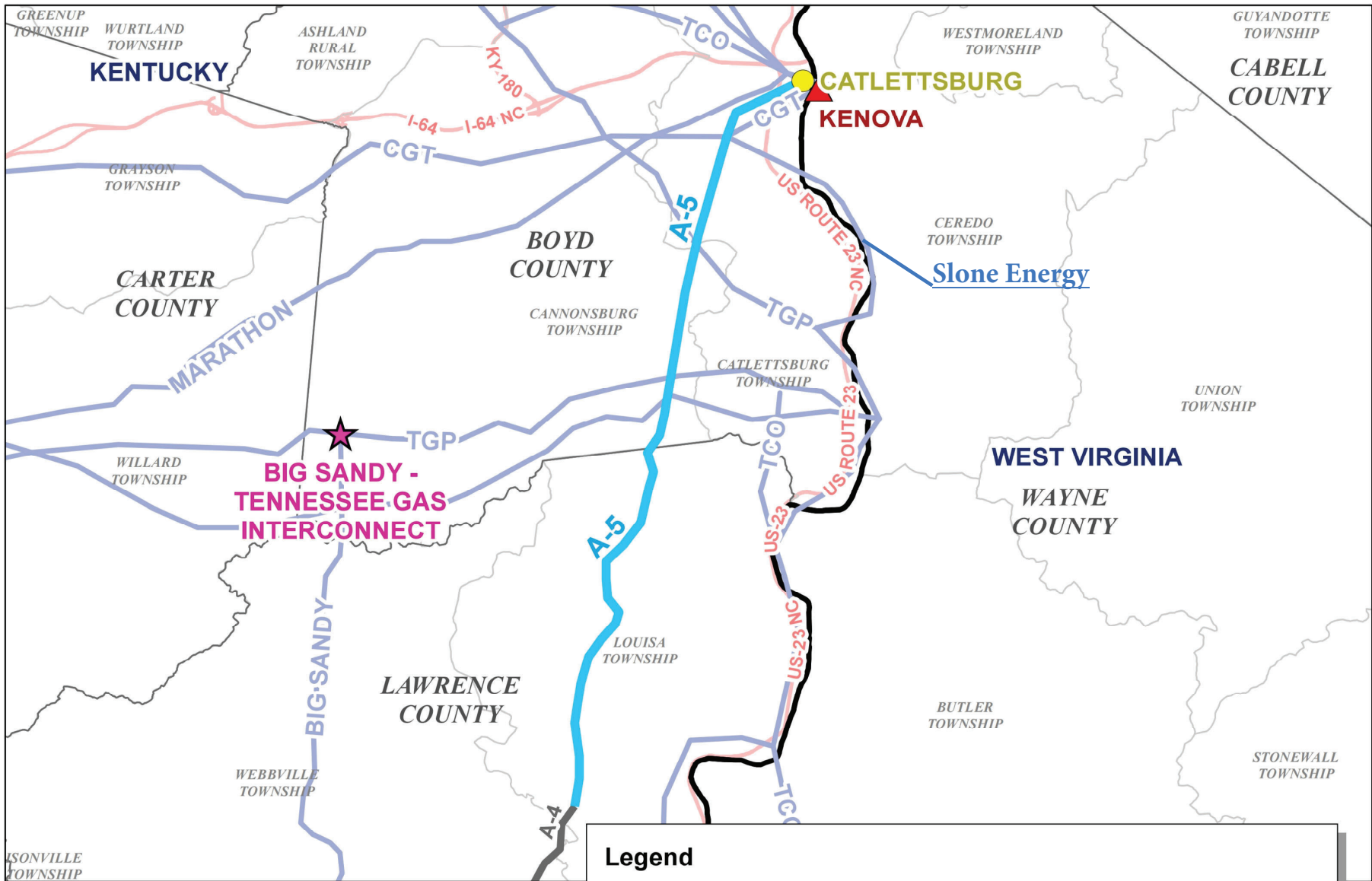
  
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		 MAJOR PIPELINES		 HIGHWAY

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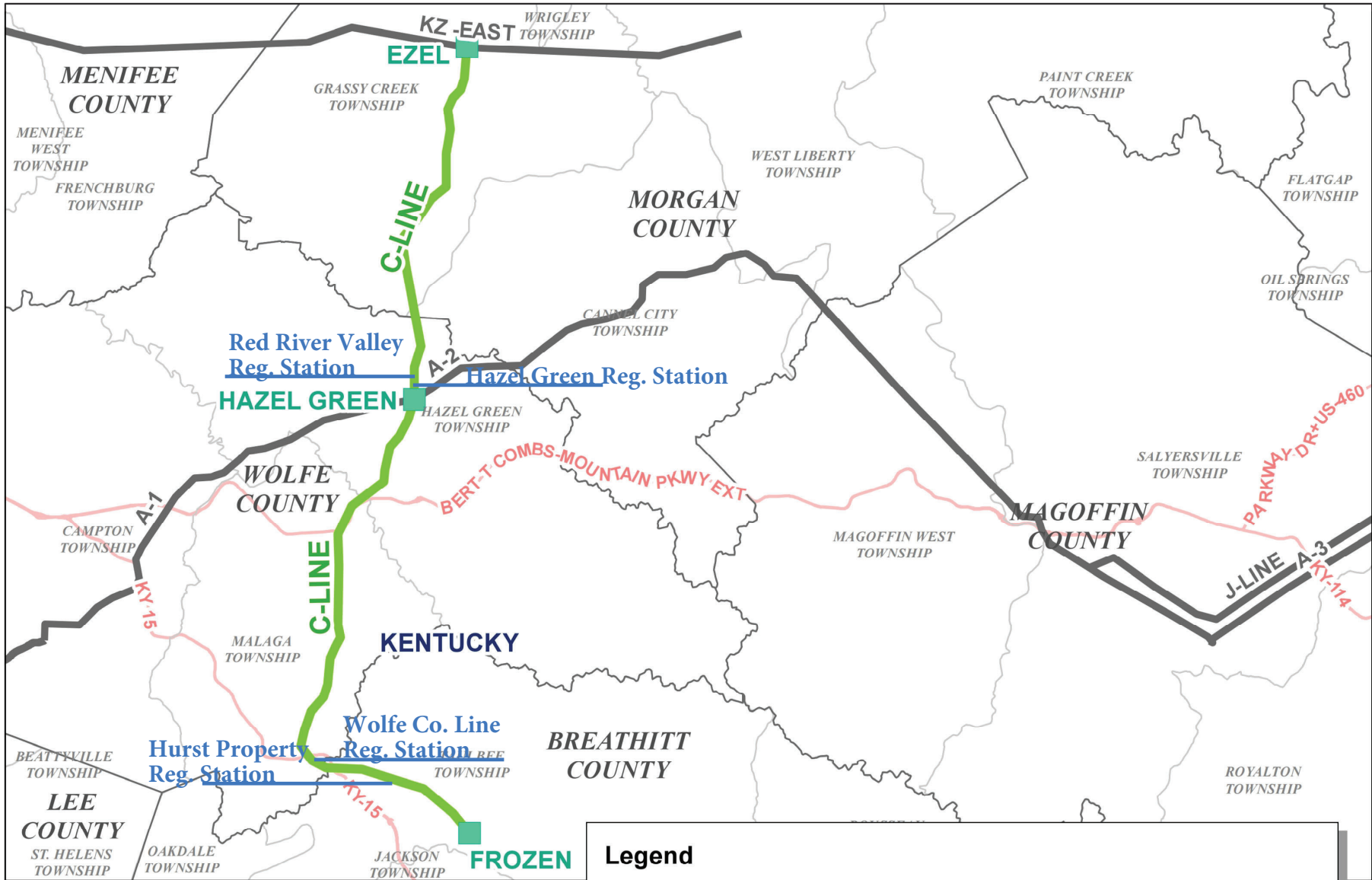
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A-3 LINE	C-LINE	KZ -WEST	REFINERY	TOWNSHIP
		MAJOR PIPELINES		HIGHWAY

1 Miles

**Request**

18. State whether East Kentucky Midstream purchases gas for redelivery to farm tap customers. If so, provide details of the transactions involved in procuring gas for the customers, including volumes and number of customers involved.
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**Response**

See response to 1 PSC 11.



## Request

19. Describe the quality of the gas supplied to East Kentucky Midstream's farm tap customers. The description should include, but not be limited to, whether dehydration equipment is used, whether the gas is odorized, and whether compression equipment is used to deliver the gas.

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## Response

As stated in EKM's proposed Tariff (Appl. Exh. B p.8/13), Original Sheet No. 4.3 (Rule 3.e), the gas EKM supplies to farm-tap customers:

- (i) is not treated or artificially odorized;
- (ii) may not be consistent in volume, heat content, or other qualities; and
- (iii) may have a heat content higher or lower than gas transported in interstate pipelines or supplied by gas distribution companies.

The gas supplied to EKM's farm-tap customers is neither represented nor obligated to be of a particular quality. However, EKM provides the following information with respect to the gas it supplies to farm-tap customers:

Pressure: Gas is "delivered at the varying pressures of the applicable EKM pipeline." See proposed Tariff, Original Sheet No. 4.2 (Rule 3.a).<sup>1</sup> Compression equipment is used on the EKM system to move gas through the system, including past and into the taps for farm-tap customers,<sup>2</sup> but is not used to deliver gas from the tap to the meter or the end-user. In fact, EKM uses regulators between the tap and the meter to decompress gas for delivery to farm-

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<sup>1</sup> Information about the applicable EKM pipelines and maximum allowable pressure thereon was provided in response to 1 PSC 01-03 in Case No. 2022-00238. Diagrams and maps of the system referenced therein are provided in this case as EKM-0001 to EKM-0017 in response to 1 PSC 17.

<sup>2</sup> Diagrams EKM-0002 (Hazel Green), EKM-0004 (Leander), EKM-0008 (Van Lear), and EKM-0010 (Means) provided in response to 1 PSC 17 indicate compressor sites on the applicable pipelines.

tap customers. Nearly all of EKM's gas deliveries for farm-tap customers are between 4.5 oz. and 6.0 oz. per square inch (0.281-0.375 psi) at the meter.

Odorization: Gas supplied may contain a natural odorant, so that the gas is readily detectable by a person with a normal sense of smell. If not, the customer must comply with the odorization requirement of 807 KAR 5:026, § 6(12). *See* proposed Tariff, Original Sheet No. 4.2 (Rule 3.b).

Dehydration/Water Vapor: EKM has a single dehydration unit at Hazel Green, Kentucky, depicted on the diagram provided as EKM-0002 in response to 1 PSC 17. There is a lowered water vapor content to gas that flows downstream from the Hazel Green unit.

Heating Value: Past testing of samples of gas gathered on what is now the EKM system and supplied to (among others) its farm-tap customers showed a heating value greater than 1.1 million British Thermal Units (MMBTUs) per 1000 cubic feet (MCF).