

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION
CASE NO. 2023-00225

Electronically Filed

In the Matter of:

ELECTRONIC TARIFF FILING OF
LINDSEY & ELLIOT GAS GO. FOR
INITIAL RULES, REGULATIONS,
AND RATES FOR FURNISHING GAS
SERVICE PURSUANT TO KRS
278.485

**LINDSEY & ELLIOTT GAS CO.'S RESPONSES TO COMMISSION STAFF'S
FOURTH SET OF REQUESTS FOR INFORMATION**

Lindsey & Elliott Gas Co. states as follows for its responses to Commission Staff's Fourth Set of Requests for Information:

GENERAL STATEMENT

In response to the Commission Staff's requests for information, Lindsey & Elliott Gas Co. has used its best efforts to provide all requested information and file all necessary paperwork requested by the Commission Staff. Lindsey & Elliott Gas Co. is a very small, independent company that shares one well tender, one bookkeeper, Will Lindsey, Jr. and his mother with one affiliated company. The process of pursuing the tariff application in this case has created a severe financial hardship on the company and Lindsey & Elliott Gas Co. would respectfully ask the Commission to review the application on the information that it has submitted.

Lindsey & Elliott Gas Co.'s business is the sale of wholesale gas and the company's computer software and its bookkeeping are geared toward that business. Lindsey & Elliott Gas Co. only has farm taps because it is a state requirement. The price charged to the farm tap customers has been the same for the last 20 years and the company feels that the rate is very fair but is willing to consider a different rate that the Commission feels is most appropriate.

REQUEST NO. 1: Refer to Lindsey & Elliott Gas' response to Commission Staff's First Request for Information (Staff's First Request), Item 28, Attachment. Explain whether it is Lindsey & Elliott Gas' intent to include the rules and regulations contained in the Domestic Gas Service Agreement in its tariff. If so, provide the additional text to be included in the tariff.

RESPONSE: As previously stated, Lindsey & Elliott Gas is open to include or exclude any language recommended by the Commission.

REQUEST NO. 2: Refer to Lindsay & Elliott Gs' response to Staff's Third Request, Page 11.

- a. Confirm the wages for the well tender and bookkeeper are the only expenses reported in Gross wages.
- b. Confirm the company does not include health insurance in its expenses for the 12-month period ending Dec.31, 2023. If not confirmed, provide the most recent billing statement
- c. Provide the itemized details and explanation for the costs included in Vehicle gas/maintenance expense in the amount of \$11,246.35, and for each item included in the expense, confirm that Lindsey Enterprise does not have any receipts, invoices, proof of payments, or billing statements to support the cost. If not confirmed, provide each associated document.
- d. Provide the itemized details and explanation for the costs included in Postage and Office Expenses expense in the amount of \$3,093.94, and for each item included in the expense, confirm that Lindsey Enterprise does not have any receipts, invoices, proof of payments, or billing statements to support the cost. If not confirmed, provide each associated document.
- e. Provide the itemized details and explanation for the costs included in well and road repairs expense in the amount of \$15,248.40, and for each item included in the expense, confirm that Lindsey Enterprise does not have any receipts, invoices, proof of payments, or billing statements to support the cost. If not confirmed, provide each associated document.

RESPONSE: a. The reported Gross wages only included the wages for the well tender (James Lester) and field operator (Will Lindsey, Jr.)

b. It does not include health insurance

c. See attachment. This shows the invoices and payments that were entered into Lindsey's system for these expenses.

d. See attachment. This shows the invoices and payments that were entered into Lindsey's system for these expenses.

e. See attachment. This shows the invoices and payments that were entered into Lindsey's system for these expenses.

REQUEST NO. 3: Refer to Lindsey Enterprises' response to Staff's Third Request, Page 1. Confoirm whether the one well tender and one bookkeeper listed are in fact Will Lindsey, Jr. and his mother.

RESPONSE: The well tender and bookkeeper are not Will Lindsey, Jr and his mother. The well tender is James Lester and the bookkeeper is Tianna Po.

Respectfully submitted,

/s/ Billy R. Shelton _____

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Counsel for Lindsey & Elliott Co.

VERIFICATION

Dated: 6/17/24

Will Lindsey, Jr.
Will Lindsey, Jr.

STATE OF KENTUCKY

COUNTY OF FAYETTE

On this the 17th day of June, 2024, before me the undersigned notary public, personally appeared the above referenced individual, proven to me through satisfactory evidence of identification, to be the person whose name is signed above, and who swore or affirmed to me that the responses contained herein and the documents attached are truthful and accurate to the best of his knowledge and belief and are based upon records maintained by the subject entity.

Terri D Shelton
Notary Public, Commonwealth of Kentucky
Commission # KYNP70761
Expiration date. 4/13/2027

Terri D. Shelton
Notary Public
My Commission Expires: 4/13/27