



## CERTIFICATE OF SERVICE

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 December 15, 2023; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



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W. Duncan Crosby III

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>ELECTRONIC INVESTIGATION INTO</b>	)	
<b>VALLEY GAS, INC. FOR AN ALLEGED</b>	)	<b>CASE NO. 2023-00331</b>
<b>FAILURE TO COMPLY WITH</b>	)	
<b>COMMISSION ORDERS AND KRS 278.160</b>	)	

**RESPONSE OF**  
**VALLEY GAS, INC. TO**  
**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**  
**DATED NOVEMBER 30, 2023**

**Filed: December 15, 2023**



**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 1**

**Responding Witness: Kerry Kasey**

**Q-1. Refer to Valley Gas's response to the Commission's October 26, 2023 Order (Valley Response), pages 2-3, numbered paragraph 4. The response states that the special contract was prepared without the assistance of legal counsel.**

- a. State whether Valley Gas sought legal counsel during any point of the process of Case No. 2014-00368.[footnote omitted]**
- b. State how often over the past five-year period Valley Gas has sought legal counsel for issues regarding the laws and regulations governed by the Commission.**
- c. Explain why Valley Gas did not obtain assistance from legal counsel to prepare the amendment to the special contract.**

A-1. a. Valley Gas did not seek or consult with legal counsel at any time during Case No. 2014-00368. Mr. Kerry Kasey prepared the contract and letter submitted to the Public Service Commission in that proceeding.

- b. In the last five years and prior to this proceeding, Valley Gas obtained legal counsel in two matters related to the Public Service Commission. Valley Gas retained Parker M. Wornall of Commonwealth Counsel Group PLLC to represent it in Case No. 2022-00001,<sup>1</sup> which involved allegations that Valley Gas had violated minimum pipeline safety standards. Mr. Wornall was a friend of the Kasey family. Commission Staff had advised Valley Gas that a licensed attorney must represent the company.

In May 2023, Valley Gas requested that Mr. Wornall review Amendment No. 1 to Mago Agreement, which Mr. Kerry Kasey had prepared.

Prior to his representation of Valley Gas in Case No. 2022-00001, Mr. Wornall did not appear in any proceeding before the Public Service Commission and has not appeared before the Public Service Commission on behalf of any party since that

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<sup>1</sup> *Electronic Investigation of Valley Gas, Inc.'s Failure to Comply with KRS 278.495, 807 KAR 5:027, and 49 C.F.R. Part 192, Case No. 2022-00001 (Ky. PSC initiated Jan. 10, 2022).*

proceeding. His areas of concentration are business law and litigation. He has limited utility law experience.

In addition to Mr. Wornall's representation, Valley Gas retained the law firm of Goldberg Simpson LLC to represent it in Case No. 2016-00200,<sup>2</sup> a purchased gas adjustment proceeding. Because of medical problems in the Kasey family and Mr. Kerry Kasey's heavy workload, Valley Gas retained legal counsel in the belief that the use of legal counsel for such proceedings might be more efficient and economical. At the conclusion of the proceeding, Valley Gas determined that continuing to prepare purchase gas adjustment filings with Commission Staff's assistance was the better alternative.

- c. Valley Gas's Response to the Order of October 26, 2023 incorrectly states that Mr. Kerry Kasey drafted Amendment No. 1 to Mago Agreement without assistance of legal counsel. Mr. Kerry prepared the amendment and then submitted to Mr. Wornall for his review and comment. To the best of Mr. Kasey's recollection, Mr. Wornall made some revisions to the document that was subsequently submitted to Commission Staff.

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<sup>2</sup> *Purchased Gas Adjustment Filing of Valley Gas, Inc.*, Case No. 2016-00200 (Ky. PSC filed June 8, 2016).

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 2**

**Responding Witness: Kerry Kasey**

- Q-2. Refer to Valley Response, page 3, numbered paragraph 8. Also, refer to Case No. 2014-00368, the Commission's October 28, 2014 final Order [footnote omitted] in regards to the ownership of the pipeline constructed for Valley Gas to service Mago Construction Company (Mago).**
- a. Confirm whether the pipeline was transferred into Valley Gas's ownership following the line's completion on April 30, 2015.**
  - b. Explain how the transfer of the pipeline was finalized.**
- A-2.**
- a. No transfer of ownership to Valley Gas occurred. Valley Gas contracted with Martin Contracting for the construction of a six-inch gas pipeline to run from the interstate pipeline delivery point to the pressure station serving Mago Construction. Mago Construction agreed to reimburse Valley Gas for the construction costs. Ownership of the pipeline has always remained with Valley Gas.
  - b. See response to Question 2a.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 3**

**Responding Witness: Kerry Kasey**

- Q-3. Refer to Valley Response, page 3, numbered paragraph 10. Explain if Valley Gas or Mago ever contacted Constellation Energy before the execution of the special contract or following the Commission's approval of the special contract in Case No. 2014-00368, to discuss the possibility of Mago purchasing natural gas directly from Constellation Energy rather than purchasing the natural gas from Valley Gas.**
- A-3. Valley Gas had discussions with Constellation about purchasing its gas supply from Constellation prior to its submission of the special contract to the Public Service Commission. John Shear, who is currently a Senior Business Development Manager for Constellation NewEnergy Gas, LLC, brought the potential project to the attention of Valley Gas. Constellation Energy supplied natural gas to Mago Construction Company's other asphalt plants. When Mr. Shear approached it, Valley Gas had always purchased its gas supply from Atmos Energy. Atmos Energy, however, had no business relationship with Mago Construction Company. Valley Gas chose to switch suppliers to make the project more attractive to Mago Construction Company. On or about December 2014, Valley Gas switched suppliers and began purchasing its supply from Constellation to obtain Mago Construction Company's business.

To the best of Mr. Kasey's recollection, Valley Gas did not contact Constellation to discuss the possibility of Mago Construction Company purchasing gas directly from Constellation. Mr. Shear briefly raised the issue with Valley Gas. Constellation initially believed that Mago Construction Company's usage would exceed Valley Gas's storage capacity and thus would require Mago Construction Company to purchase gas directly from Constellation to have adequate storage capacity. Once Constellation determined that Valley Gas had sufficient storage capacity, but it did not raise the topic of direct purchases of gas by Mago Construction Company with Valley Gas again. Valley Gas has no knowledge of any discussions between Mago Construction Company and Constellation regarding the direct purchase of natural gas.



**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 4**

**Responding Witness: Kerry Kasey**

**Q-4. Refer to Valley Response, page 4, numbered paragraph 13.**

- a. Describe in full the services Valley Gas provides to Mago.**
- b. Provide an itemized breakdown of Valley Gas's actual annual costs of providing the services to Mago that are included in the \$489 per month customer charge.**

- A-4.
- a. Valley Gas supplies natural gas service to Mago Construction Company ("Mago"). It is responsible for arranging and purchasing an adequate supply of natural gas to meet Mago's needs, as well as the needs of other Valley Gas customers, to operate and maintain the facilities necessary to safely transport that gas to Mago's delivery point, and to properly bill Mago for that service.
  - b. The following annual costs are included in the monthly customer charge of \$489: (1) depreciation expense on the turbine meter serving Mago (\$1,050); (2) depreciation expense of the regulator station serving Mago (\$2,936); (3) testing of regulator and inspection of regulator and turbine meters (amortized) (\$520), (4) lubrication of turbine meter (\$100); (5) labor associated with annual corrosion check (\$25); and (6) general maintenance and upkeep (\$250).

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 5**

**Responding Witness: Kerry Kasey**

**Q-5. Refer to Valley Response, page 4, numbered paragraph 13. Also, refer to Case No. 2014-00368, the Special Contract [footnote omitted]. Explain why the cost associated with the meter required to serve Mago were [sic] not assessed during the special contract negotiations with Mago.**

A-5. Valley Gas saw no reason to treat Mago Construction any differently than its other customers. It did not require its other customers to pay the cost of metering equipment or pressure regulators as part of a connection fee. Moreover, it had concerns that assessing Mago Construction Company the cost of meter equipment would result in the transfer of ownership and control of the equipment to Mago Construction. It believed that retaining control over the metering equipment was necessary to protect Valley Gas's interests.

Valley Gas also believed that other potential customers could be served through the pressure regulator station. A large grain storage operation was located near the Mago Construction Company site and could request gas service to serve its grain drying operations. Another potential large gas customer located nearby was a rock quarry operated by Liter's Inc. Instead of charging Mago Construction Company the cost of the regulator station and facing potential issues if additional customers were subsequently served, Valley Gas elected to charge a monthly fee to recover the cost of the regulator and meter. This arrangement permitted adjustments to the monthly charge if other customers were subsequently served through those facilities and avoided any claim from Mago Construction that it had purchased the facilities and they reserved solely for service to Mago Construction.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 6**

**Responding Witness: Kerry Kasey**

- Q-6. Refer to Valley Response, page 4, numbered paragraph 15. State whether Valley Gas is aware of any violations of KRS 278.160 that may have occurred during the last five-year period.**
- A-6. Valley Gas is not aware of any violations of KRS 278.160 other than those addressed in its Response to the Public Service Commission's Order of October 26, 2023. Valley Gas has previously acknowledged that violations of KRS 278.160 may have occurred, but these violations were not willful or intentional; rather, they resulted from a lack of knowledge or understanding of the requirements of KRS Chapter 278.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 7**

**Responding Witness: Kerry Kasey**

- Q-7. Refer to Valley Response, page 5, numbered paragraph 15. Also, refer to Valley Response, page 7, numbered 23. Valley Gas states that, "its officers were unaware of the requirements of KRS 278.160 and would have complied with that statute had they been aware of its requirements." Explain in detail the steps Valley Gas is taking to ensure that its officers are aware and in compliance with all applicable laws and regulatory requirements of the Commission.**
- A-7. Valley Gas has retained legal counsel to represent it in this proceeding. As part of that representation, counsel will be reviewing Valley Gas's existing procedures and training and making suggestions to improve Valley Gas's compliance with the provisions of KRS Chapter 278 and the Commission's regulations. It will be searching for opportunities in which Valley Gas officers and employees can receive cost-effective training to better enable them to increase their knowledge and understanding of applicable laws and regulatory requirements.

Valley Gas is a member of the Kentucky Gas Association ("KGA"). It commits to attending programs that the KGA may offer regarding the requirements imposed by KRS Chapter 278 and Public Service Commission regulations on Commission-regulated gas utilities. It will also search for programs offered by other entities that address such topics.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 8**

**Responding Witness: Kerry Kasey**

- Q-8. Refer to Case No. 2014-00368, the Commission's October 28, 2014 final Order, page 6, items 10 and 11[footnote omitted]. Confirm that Valley Gas was able to meet all applicable requirements for safety standards for construction and operation as directed in the Commission's Order.**
- A-8. The facilities required to serve Mago Construction Company were constructed in accordance with 49 C.F.R. Part 192 and 807 KAR 5:022 and met all safety standards in effect as of October 28, 2014. Martin Contracting constructed the pipeline discussed in the Public Service Commission's Order of October 28, 2014 and, at the time of construction, was qualified to perform the construction.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 9**

**Responding Witness: Kerry Kasey**

- Q-9. Confirm whether all rates and charges included in Valley Gas's current tariff on file with the Commission include the correct rates and charges being billed to Valley Gas customers.**
- A-9. The rates and charges that Valley Gas is currently billing its customers are the rates and charges set forth in its filed tariff.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 10**

**Responding Witness: Kerry Kasey**

**Q-10. Provide the monthly usage reports for Mago for the years 2018, 2019, 2020, 2021, 2022, and 2023 year to date.**

A-10. See Attachment to this response.

Date	Residential Usage	Residential Revenue	Commerical Usage	Commerical Revenue	Total Resid & Comm Usage	Total Resid & Comm Revenue	Industrial Usage	Industrial Revenue	Total Usage	Purchases	Usage Pur	Monthly Gas Cost	Transportation Cost	Usage Thru City Gate	Inventory Volume	Total Gas Cost
Jan-18	7,685.8	\$ 52,898.61	1,607.8	\$ 10,994.73	9,293.6	\$ 63,893.34	-	\$ -	9,294.0	Jan-18	4,950	\$ 18,509.91	\$ 7,861.31	8,728.0	3,090.0	\$ 26,371.22
Feb-18	4,396.6	\$ 30,280.14	843.6	\$ 5,771.25	5,240.2	\$ 36,031.39	-	\$ -	5,240.0	Feb-18	4,550	\$ 13,855.31	\$ 4,546.74	5,048.0	2,592.0	\$ 18,402.05
Mar-18	4,552.2	\$ 31,356.47	793.9	\$ 5,442.32	5,346.1	\$ 36,798.79	-	\$ -	5,346.0	Mar-18	3,050	\$ 9,506.00	\$ 4,779.12	5,306.0	336.0	\$ 14,285.12
Apr-18	2,286.0	\$ 16,933.44	454.0	\$ 3,349.76	2,740.0	\$ 20,283.20	-	\$ -	2,740.0	Apr-18	4,375	\$ 12,747.20	\$ 3,132.63	3,478.0	-	\$ 15,879.83
May-18	677.0	\$ 5,001.97	165.0	\$ 1,212.94	842.0	\$ 6,214.91	2,531.0	\$16,598.65	3,373.0	May-18	3,336	\$ 9,738.81	\$ 3,086.69	3,427.0	-	\$ 12,825.50
Jun-18	448.0	\$ 3,305.03	120.0	\$ 878.38	568.0	\$ 4,183.41	2,083.0	\$13,660.67	2,651.0	Jun-18	1,990	\$ 5,878.90	\$ 2,328.35	2,585.0	2,044.0	\$ 8,207.25
Jul-18	360.0	\$ 2,660.75	92.0	\$ 676.07	452.0	\$ 3,336.82	2,904.0	\$19,044.22	3,356.0	Jul-18	4,750	\$ 14,033.85	\$ 2,788.61	3,096.0	-	\$ 18,822.46
Aug-18	339.0	\$ 2,519.91	89.0	\$ 657.08	428.0	\$ 3,176.99	2,683.8	\$17,599.95	3,111.8	Aug-18	4,619	\$ 14,235.26	\$ 3,063.35	3,401.1	(8,297.0)	\$ 17,298.61
Sep-18	447.0	\$ 3,162.38	121.0	\$ 853.80	568.0	\$ 4,016.18	399.0	\$ 3,350.52	967.0	Sep-18	4,800	\$ 14,621.28	\$ 622.48	691.1	8,843.0	\$ 15,243.76
Oct-18	1,255.0	\$ 8,873.43	221.0	\$ 1,559.66	1,476.0	\$ 10,433.09	0.9	\$ 5.71	1,476.9	Oct-18	4,814	\$ 15,717.54	\$ 2,116.64	2,350.0	2,464.0	\$ 17,834.18
Nov-18	3,012.0	\$ 20,547.25	539.0	\$ 3,665.34	3,551.0	\$ 24,212.59	-	\$ -	3,551.0	Nov-18	4,989	\$ 19,769.16	\$ 5,262.80	5,843.0	(854.0)	\$ 25,031.96
Dec-18	4,085.0	\$ 27,864.36	790.0	\$ 5,351.44	4,875.0	\$ 33,215.80	-	\$ -	4,875.0	Dec-18	4,360	\$ 15,256.21	\$ 5,192.56	5,764.4	(1,404.4)	\$ 20,448.77
Jan-19	5,534.0	\$ 30,722.62	1,091.0	\$ 5,989.42	6,625.0	\$ 36,712.04	-	\$ -	6,625.0	Jan-19	4,960	\$ 15,100.88	\$ 6,878.66	7,636.2	(2,676.2)	\$ 21,979.54
Feb-19	4,788.0	\$ 26,525.91	1,012.0	\$ 5,529.75	5,800.0	\$ 32,055.66	-	\$ -	5,800.0	Feb-19	3,950	\$ 11,551.06	\$ 4,784.52	5,311.4	(1,361.4)	\$ 16,335.58
Mar-19	4,927.0	\$ 27,298.15	884.0	\$ 4,842.62	5,811.0	\$ 32,140.77	-	\$ -	5,811.0	Mar-19	4,198	\$ 12,410.22	\$ 4,728.88	5,247.4	(1,049.4)	\$ 17,137.10
Apr-19	1,878.0	\$ 10,405.71	377.0	\$ 2,075.48	2,255.0	\$ 12,481.19	-	\$ -	2,255.0	Apr-19	2,714	\$ 7,535.57	\$ 1,531.17	1,699.8	1,014.2	\$ 9,066.74
May-19	583.0	\$ 3,232.95	155.0	\$ 846.28	738.0	\$ 4,079.23	-	\$ -	738.0	May-19	3,881	\$ 10,788.83	\$ 1,094.29	1,214.8	2,666.2	\$ 11,883.12
Jun-19	560.0	\$ 2,969.90	131.0	\$ 721.99	691.0	\$ 3,691.89	1,853.0	\$12,643.34	2,544.0	Jun-19	3,563	\$ 9,461.37	\$ 2,399.40	2,663.6	899.4	\$ 11,860.77
Jul-19	367.0	\$ 2,545.09	99.0	\$ 684.26	466.0	\$ 3,229.35	4,263.0	\$29,571.61	4,729.0	Jul-19	3,949	\$ 10,432.37	\$ 4,050.50	4,496.6	(547.6)	\$ 14,482.87
Aug-19	356.0	\$ 2,472.86	108.0	\$ 750.15	464.0	\$ 3,223.01	1,651.0	\$11,749.99	2,115.0	Aug-19	4,810	\$ 11,898.08	\$ 1,736.67	1,927.9	2,882.1	\$ 13,634.75
Sep-19	333.0	\$ 2,312.33	106.0	\$ 732.35	439.0	\$ 3,044.68	36.0	\$ 235.62	475.0	Sep-19	2,500	\$ 7,147.50	\$ 1,174.58	1,303.9	1,196.1	\$ 8,322.08
Oct-19	726.0	\$ 6,097.25	196.0	\$ 1,640.92	922.0	\$ 7,738.17	963.0	\$ 7,317.95	1,885.0	Oct-19	4,125	\$ 10,128.55	\$ 2,131.89	2,366.7	-	\$ 12,260.44
Nov-19	3,020.0	\$ 25,346.72	659.0	\$ 5,477.16	3,679.0	\$ 30,823.88	-	\$ -	3,679.0	Nov-19	4,175	\$ 11,245.33	\$ 4,288.15	4,771.5	(4,468.0)	\$ 15,543.48
Dec-19	3,828.0	\$ 32,092.58	830.0	\$ 6,923.93	4,658.0	\$ 39,016.51	-	\$ -	4,658.0	Dec-19	5,614	\$ 14,746.58	\$ 4,706.13	5,224.4	-	\$ 19,452.71



Date	Residential Usage	Residential Revenue	Commerical Usage	Commerical Revenue	Total Resid & Comm Usage	Total Resid & Comm Revenue	Industrial Usage	Industrial Revenue	Total Usage	Purchases	Usage Pur	Monthly Gas Cost	Transportation Cost	Usage Thru City Gate	Inventory Volume	Total Gas Cost			
Jan-20	4,401.0	\$ 34,665.97	950.0	\$ 7,428.08	5,351.0	\$ 42,094.05			5,351.0	Jan-20	2,852	\$ 7,600.88	\$ 5,223.14	5,799.0		\$ 12,824.02			
Feb-20	4,521.0	\$ 35,612.19	1,010.0	\$ 7,893.54	5,531.0	\$ 43,505.73			5,531.0	Feb-20	2,775	\$ 7,389.48	\$ 5,181.75	5,753.0		\$ 12,571.23			
Mar-20	2,976.0	\$ 19,128.53	635.0	\$ 4,045.92	3,611.0	\$ 23,174.45			3,611.0	Mar-20	2,900	\$ 7,725.60	\$ 2,990.30	3,320.0		\$ 10,715.90			
Apr-20	1,556.0	\$ 10,017.93	306.0	\$ 1,951.61	1,862.0	\$ 11,969.54	-	\$ -	1,862.0	Apr-20	2,700	\$ 7,187.80	\$ 1,970.72	2,188.0		\$ 9,158.52			
May-20	1,084.0	\$ 6,967.19	243.0	\$ 1,553.28	1,327.0	\$ 8,520.47	879.0	\$ 6,682.61	2,206.0	May-20	2,800	\$ 7,456.70	\$ 1,742.86	1,935.0		\$ 9,199.56			
Jun-20	451.0	\$ 2,898.30	164.0	\$ 1,054.13	615.0	\$ 3,952.43	2,114.0	\$16,061.13	2,729.0	Jun-20	3,740	\$ 9,101.70	\$ 2,738.15	3,040.0		\$ 11,839.85			
Jul-20	360.0	\$ 2,207.51	147.0	\$ 899.12	507.0	\$ 3,106.63	-	\$ -	507.0	Jul-20	2,825	\$ 7,523.93	\$ 1,152.82	1,279.9		\$ 8,676.75			
Aug-20	343.0	\$ 2,103.44	122.0	\$ 750.08	465.0	\$ 2,853.52	-	\$ -	465.0	Aug-20	4,097	\$ 10,641.88	\$ 1,565.43	1,738.0		\$ 12,207.31			
Sep-20	431.0	\$ 2,644.31	149.0	\$ 908.20	580.0	\$ 3,552.51	-	\$ -	580.0	Sep-20	2,600	\$ 6,918.90	\$ 1,834.74	2,037.0	(13,112.0)	\$ 8,753.64			
Oct-20	703.0	\$ 4,314.64	181.0	\$ 1,107.17	884.0	\$ 5,421.81	-	\$ -	884.0	Oct-20	2,650	\$ 7,053.35	\$ 1,843.32	2,046.5	(896.0)	\$ 8,896.67			
Nov-20	1,766.0	\$ 9,737.72	349.0	\$ 1,919.28	2,115.0	\$ 11,657.00	-	\$ -	2,115.0	Nov-20	2,425	\$ 6,237.33	\$ 2,981.56	3,310.3	(1,760.0)	\$ 9,218.89			
Dec-20	3,328.0	\$ 18,997.05	737.0	\$ 4,017.28	4,065.0	\$ 22,414.33	-	\$ -	4,065.0	Dec-20	4,625	\$ 12,265.33	\$ 5,685.76	6,312.6	(2,308.0)	\$ 17,951.09			
Jan-21	6,140.0	\$ 37,693.68	1,461.0	\$ 8,849.10	7,601.0	\$ 46,542.78	-	\$ -	7,601.0	Jan-21	4,975	\$ 13,512.88	\$ 6,507.90	7,225.4		\$ 20,020.78			
Feb-21	5,984.0	\$ 36,734.44	1,460.0	\$ 8,844.34	7,444.0	\$ 45,578.78	-	\$ -	7,444.0	Feb-21	5,335	\$ 24,476.11	\$ 6,721.33	7,462.3		\$ 31,197.44			
Mar-21	2,473.0	\$ 15,183.56	550.0	\$ 3,351.51	3,023.0	\$ 18,535.07	-	\$ -	3,023.0	Mar-21	2,387	\$ 6,135.14	\$ 3,151.71	3,499.2	15,691.0	\$ 9,286.85			
Apr-21	1,504.0	\$ 9,230.30	373.0	\$ 2,281.34	1,877.0	\$ 11,511.64	3,489.0	\$21,418.70	5,366.0	Apr-21	3,396	\$ 8,915.58	\$ 5,225.63	5,801.7		\$ 14,141.21			
May-21	1,034.0	\$ 6,349.02	277.0	\$ 1,691.68	1,311.0	\$ 8,040.70	3,655.0	\$22,435.90	4,966.0	May-21	4,759	\$ 13,774.70	\$ 3,715.48	4,125.1		\$ 17,490.18			
Jun-21	349.0	\$ 2,140.83	130.0	\$ 796.40	479.0	\$ 2,937.23	-	\$ -	479.0	Jun-21	3,420	\$ 9,603.92	\$ 592.55	657.9	(4,038.0)	\$ 10,196.47			
Jul-21	460.0	\$ 4,116.74	200.0	\$ 1,787.97	660.0	\$ 5,904.71	2,536.0	\$22,696.26	3,196.0	Jul-21	3,750	\$ 11,598.61	\$ 2,877.10	3,194.3		\$ 14,475.71			
Aug-21	343.0	\$ 3,070.35	135.0	\$ 1,203.60	478.0	\$ 4,273.95	-	\$ -	478.0	Aug-21	3,320	\$ 10,332.94	\$ 72.07	80.0		\$ 10,405.01			
Sep-21	430.0	\$ 3,848.77	119.0	\$ 1,063.19	549.0	\$ 4,911.96	911.0	\$ 6,148.37	1,460.0	Sep-21	2,100	\$ 5,363.40	\$ 1,292.25	1,434.7	(20,162.0)	\$ 6,655.65			
Oct-21	492.0	\$ 4,348.84	141.0	\$ 1,243.79	633.0	\$ 5,592.63	967.0	\$ 6,524.60	1,600.0	Oct-21	4,531	\$ 18,612.40	\$ 1,003.24	1,113.8		\$ 19,615.64			
Nov-21	2,689.0	\$ 23,758.25	574.0	\$ 5,049.91	3,263.0	\$ 28,808.16	-	\$ -	3,263.0	Nov-21	3,500	\$ 13,712.00	\$ 3,937.45	4,371.5		\$ 17,649.45			
Dec-21	3,100.0	\$ 27,394.17	686.0	\$ 6,033.31	3,786.0	\$ 33,427.48	-	\$ -	3,786.0	Dec-21	4,600	\$ 15,492.80	\$ 3,633.91	4,034.5	573.0	\$ 19,126.71			
Jan-22	5,673.0	\$ 51,371.76	1,227.0	\$ 11,037.83	6,900.0	\$ 62,409.59	-	\$ -	6,900.0	Jan-22	3,508	\$ 11,213.46	\$ 7,721.77	8,573.1		\$ 18,935.23			
Feb-22	5,784.0	\$ 52,379.43	1,352.0	\$ 12,154.46	7,136.0	\$ 64,533.89	-	\$ -	7,136.0	Feb-22	2,469	\$ 7,489.90	\$ 5,366.70	5,958.4		\$ 12,856.60			
Mar-22	3,039.0	\$ 27,547.55	696.0	\$ 6,265.87	3,735.0	\$ 33,813.42	-	\$ -	3,735.0	Mar-22	2,100	\$ 5,610.00	\$ 3,282.69	3,644.6	20,878.0	\$ 8,892.69			
Apr-22	1,765.0	\$ 23,301.94	381.0	\$ 5,013.02	2,146.0	\$ 28,314.96	4.0	\$ 43.00	2,150.0	Apr-22	2,045	\$ 5,428.32	\$ 1,891.26	2,099.8		\$ 7,319.58			
May-22	550.0	\$ 7,256.40	179.0	\$ 2,351.17	729.0	\$ 9,607.57	956.0	\$10,276.71	1,685.0	May-22	2,075	\$ 5,532.50	\$ 1,246.44	1,383.9		\$ 6,778.94			
Jun-22	431.0	\$ 5,687.36	154.0	\$ 2,028.44	585.0	\$ 7,715.80	2,950.0	\$31,708.39	3,535.0	Jun-22	3,426	\$ 17,353.75	\$ 2,756.73	3,060.7	2,762.0	\$ 20,110.48			
Jul-22	304.0	\$ 2,804.16	100.0	\$ 855.66	404.0	\$ 3,459.82	1,717.0	\$16,088.41	2,121.0	Jul-22	2,431	\$ 8,234.38	\$ 1,867.85	2,073.8		\$ 10,102.23			
Aug-22	409.0	\$ 3,503.57	107.0	\$ 914.44	516.0	\$ 4,418.01	1,310.0	\$12,540.37	1,826.0	Aug-22	2,050	\$ 5,455.00	\$ 1,195.99	1,327.8		\$ 6,650.99			
Sep-22	323.0	\$ 2,772.46	82.0	\$ 705.68	405.0	\$ 3,478.14	550.0	\$ 5,150.35	955.0	Sep-22	3,270	\$ 15,300.15	\$ 2,082.19	2,311.7	(29,444.0)	\$ 17,382.34			
Oct-22	1,106.0	\$ 10,513.83	218.0	\$ 2,072.48	1,324.0	\$ 12,586.31	4,221.0	\$39,566.34	5,545.0	Oct-23	4,828	\$ 23,845.75	\$ 4,876.60	5,192.2		\$ 28,522.35			
Nov-22	2,658.0	\$ 25,336.23	547.0	\$ 5,184.13	3,205.0	\$ 30,520.36	904.0	\$ 8,474.89	4,109.0	Nov-23	6,570	\$ 32,164.47	\$ 4,328.11	4,803.1		\$ 36,490.58			
Dec-22	3,729.0	\$ 35,555.51	772.0	\$ 7,310.08	4,501.0	\$ 42,865.59	-	\$ -	4,501.0	Dec-23	4,800	\$ 24,288.75	\$ 5,698.17	6,326.4	497.0	\$ 29,986.92			
23-Jan	4,294.0	\$ 37,626.63	892.0	\$ 7,764.61	5,186.0	\$ 45,391.24	-	\$ -	5,186.0	23-Jan	5,419	\$ 19,092.40	\$ 5,024.31	5,578.2		\$ 24,116.71			
23-Feb	3,796.0	\$ 33,263.61	835.0	\$ 7,270.88	4,631.0	\$ 40,534.49	-	\$ -	4,631.0	23-Feb	6,135	\$ 19,723.83	\$ 3,836.01	4,258.9		\$ 23,559.84			
23-Mar	3,864.0	\$ 33,851.71	819.0	\$ 7,136.42	4,683.0	\$ 40,988.13	-	\$ -	4,683.0	23-Mar	2,160	\$ 6,858.00	\$ 3,791.04	4,209.0	21,397.0	\$ 10,649.04			
23-Apr	1,824.0	\$ 11,793.12	398.0	\$ 2,554.51	2,222.0	\$ 14,347.63	33.0	\$ 215.36	2,255.0	23-Apr	4,770	\$ 14,126.40	\$ 2,703.64	3,001.7		\$ 16,830.04			
23-May	673.0	\$ 4,355.40	175.0	\$ 1,125.33	848.0	\$ 5,480.73	2,870.0	\$18,581.80	3,718.0	23-May	4,929	\$ 14,606.04	\$ 3,384.67	3,757.8		\$ 17,990.71			
23-Jun	464.0	\$ 3,081.61	148.0	\$ 972.87	612.0	\$ 4,054.48	555.0	\$ 3,586.76	1,167.0	23-Jun	4,770	\$ 14,159.25	\$ 510.78	567.1	(4,200.0)	\$ 14,670.03			
23-Jul	350.0	\$ 2,324.72	105.0	\$ 693.22	455.0	\$ 3,017.94	973.0	\$ 6,293.98	1,428.0	23-Jul	4,929	\$ 14,614.51	\$ 1,600.00	1,776.4		\$ 16,214.51			
23-Aug	372.0	\$ 2,630.29	119.0	\$ 834.93	491.0	\$ 3,465.22	1,879.0	\$13,286.92	2,370.0	23-Aug	4,929	\$ 14,573.19	\$ 2,506.29	2,782.6		\$ 17,079.48			
23-Sep	290.0	\$ 2,049.53	101.0	\$ 709.52	391.0	\$ 2,759.05	890.0	\$ 6,296.56	1,281.0	23-Sep	4,770	\$ 14,093.55	\$ 1,006.29	1,117.2	(38,213.0)	\$ 15,099.84			
total	23,420	202,382	5,129	43,629	28,549	246,011	12,325	96,283	40,874	total	59,009	212,146	39,064	43,371	(20,519)	251,210			
DR Response																			
Purchased are DTH and sales are MCF																			

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 11**

**Responding Witness: Kerry Kasey**

**Q-11. Provide the monthly billing Valley Gas charged to Mago for the years 2018, 2019, 2020, 2021, 2022, and 2023 year to date.**

A-11. See attachment to response to Question 10. The column labeled "Industrial Revenue" represents the amounts billed to Mago Construction Company.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 12**

**Responding Witness: Kerry Kasey**

- Q-12. Provide the monthly usage reports for Valley Gas residential and commercial customers for the years 2018, 2019, 2020, 2021, 2022, and 2023 year to date.**
- A-12. See attachment to response to Question 10. The columns labeled "Residential Usage" and "Commercial Usage" represent the monthly usage of residential and commercial customers, respectively.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 13**

**Responding Witness: Kerry Kasey**

**Q-13. Provide the cost and volume of Mcf of natural gas purchased by Valley Gas for each month for the years 2018, 2019, 2020, 2021, 2022, and 2023 year to date.**

A-13. See attachment to response to Question 10. The columns labeled "Monthly Gas Cost" and "Usage Pur" represent monthly cost of purchased gas and the volume of natural gas purchased, respectively. The total monthly cost of natural gas, including transportation cost is shown in the column labeled "Total Gas Cost."

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 14**

**Responding Witness: Kerry Kasey**

- Q-14. Confirm whether Valley Gas has been charging the Commission-approved Gas Cost Recovery (GCR) rates to its customers since 2018. If not, provide the instances in which Valley Gas failed to charge the Commission approved GCR rate, what GCR rate was instead charged, and when the incorrect GCR rate was applied.**
- A-14. To the best of its knowledge, Valley Gas has been charging the approved Gas Cost Recovery rates to its customers since 2018.

**VALLEY GAS, INC.**

**Response to Commission Staff's First Request for Information  
Dated November 30, 2023**

**Case No. 2023-00331**

**Question No. 15**

**Responding Witness: Kerry Kasey**

- Q-15. Refer to Valley Gas' Purchased Gas Cost Adjustment Clause tariff [footnote omitted]. The tariff states, "The GCR shall become effective for billing for service rendered on or after the first day of each calendar quarter". For an example, assume the Commission approved a GCR rate with an effective date of January 1, 2024. Explain if Valley Gas applies the Commission approved GCR rate to customer billings received on or around January 1, 2024, or if Valley Gas applies the Commission approved GCR rate to customer usage metered on and after January 1, 2024.**
- A-15. Valley Gas will bill the GCR rate in effect at the time the billed service was rendered. Valley Gas reads its meters on or about the twentieth day of each month. For the example presented, the meter would have been read on December 20, 2023 and thus service would have been rendered before the change in the GCR rate and would be billed at the old GCR rate, not the rate that becomes effective on January 1, 2024.