COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED GAS)
ADJUSTMENT FILLING OF VALLEY GAS,) CASE NO. 2023-00385
INC.)
ELECTRONIC PURCHASED GAS)
ADJUSTMENT FILLING OF VALLEY GAS,) CASE NO. 2024-00175
INC.)

MOTION FOR CONFERENCE WITH COMMISSION STAFF

Pursuant to 807 KAR 5:001, Section 9(4), Valley Gas, Inc. ("Valley Gas") renews its motion for the Commission to convene a videoconference for the purpose of discussing the methodology that Valley Gas should employ to calculate its Gas Cost Recovery ("GCR") Rate in future GCR filings.

In support of its Motion, Valley Gas states:

1. In its Order establishing Case No. 2023-00385, the Commission stated that Valley Gas was not properly calculating its GCR Rate because it failed to include purchases of gas subsequently sold to Mago Construction Company and gas sales to Mago Construction Company in its calculations.

2. On February 25, 2024, Valley Gas moved for a conference with Commission Staff to discuss the appropriate methodology that should be employed to calculate its GCR Rate in future filings. In its motion, Valley Gas stated its desire to use the appropriate methodology to calculate its GCR rate but that it was uncertain how those calculations should be made since they rely in part on calculations from previous quarterly reports which the Commission has deemed improperly calculated. Valley Gas further stated that the requested conference would enable it to submit

1

correctly calculated quarterly reports, avoid the need for additional Commission proceedings to review and correct future GCR Rate filings, and avoid the Commission expending valuable resources needlessly. Valley Gas made its motion after Commission Staff rejected its informal approaches for assistance and had advised Valley Gas to request a conference.

3. As of this date the Commission has neither acted upon Valley Gas's motion for a conference nor has it issued a final decision in Case No. 2023-00385.

4. Having received no guidance regarding the correct methodology to use in the preparation of its quarterly GCR Rate filings, Valley Gas on May 30, 2024, filed with the Commission its quarterly GCR Rate filing using the methodology that it has previously used.

5. On June 28, 2024, the Commission established Case No. 2024-00175 to investigate Valley Gas's most recent GCR Rate quarterly filing for the same reasons for which Case No. 2023-00385 was initiated.

6. Valley Gas respectfully submits that a conference between Commission Staff and Valley Gas to discuss the methodology that Valley Gas should employed to calculate its GCR Rate in future GCR filings will likely result in the submission of properly calculated quarterly reports, avoid need for additional Commission proceedings to review and correct future GCR Rate filings, and reduce the expenditure of valuable resources.

WHEREFORE, Valley Gas requests that the Commission schedule a videoconference in these matters for the purpose of discussing the methodology that Valley Gas should employ to calculate its Gas Cost Recovery Rate.

2

Dated: July 15, 2024

Respectfully submitted,

W. Duncan Crosby III Stoll Keenon Ogden PLLC 400 West Market Street, Suite 2700 Louisville, Kentucky 40202 Telephone: (502) 560-4263 Fax: (502) 333-6099 duncan.crosby@skofirm.com

Gerald E. Wuetcher Emily S. Childress Stoll Keenon Ogden PLLC 300 West Vine Street, Suite 2100 Lexington, Kentucky 40507 Telephone: (859) 231-3000 Fax: (859) 259-1093 gerald.wuetcher@skofirm.com emily.childress@skofirm.com

Counsel for Valley Gas, Inc.

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 July 15, 2024; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

1

W. Duncan Crosby III