COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF OHIO VALLEY GAS CORPORATION AND VALLEY GAS, INC. FOR APPROVAL OF OHIO VALLEY GAS CORPORATION'S ACQUISITION OF VALLEY GAS, INC.'S UTILITY ASSETS IN BRECKINRIDGE COUNTY, KENTUCKY AND APPROVAL TO RECOVER AN ASSOCIATED ACQUISITION ADJUSTMENT	))))))))	CASE NO. 2026-00120

<u>OHIO VALLEY GAS CORPORATION'S VERIFIED RESPONSES TO THE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION</u>

Joint Applicant Ohio Valley Gas Corporation ("Ohio Valley Gas" or "OVG"), by counsel, hereby submits its Verified Responses to the Commission Staff's First Request for Information, entered on June 22, 2026.

Dated this 1st day of July, 2026.

Respectfully submitted,

OHIO VALLEY GAS CORPORATION

<u>/s/ Rajan Kapoor</u>
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Counsel for Ohio Valley Gas Corporation

DATA REQUEST

PSC 1_1

Refer to the Joint Application, generally. Explain whether Valley Gas, Inc.'s (Valley Gas) current customers will be subject to Ohio Valley Gas's current rates and tariffs immediately upon consummation of this acquisition or if those customers will still be subject to Valley Gas's current rates set forth on its tariff until a later time.

RESPONSE

Valley Gas customers will not be subject to Ohio Valley Gas Corporation's ("Ohio Valley Gas" or "OVG") current Indiana rates and tariffs upon consummation of the acquisition. Following closing, Valley Gas customers will continue to be served under Valley Gas's existing tariff rates and schedules as currently on file with the Kentucky Public Service Commission. Ohio Valley Gas does not intend to alter the rates or tariff terms applicable to Valley Gas customers at the time of consummation. Any change to the rates or tariff applicable to the acquired Valley Gas service territory will be addressed through a separate proceeding before the Commission at a future date. Ohio Valley Gas intends to file a tariff with the Kentucky Public Service Commission following consummation of the acquisition in due course.

Witness: John T. Stenger

DATA REQUEST

PSC 1_2

Explain whether Ohio Valley Gas has provided any notice to prospective customers of its planned acquisition of Valley Gas or its application for approval of this transaction.

RESPONSE

Ohio Valley Gas Corporation has not provided direct notice to Valley Gas customers regarding the planned acquisition. The transaction has not yet been consummated. Ohio Valley Gas and Valley Gas have executed an Asset Purchase Agreement, the closing of which is contingent upon approval by the Kentucky Public Service Commission, including approval of the acquisition premium and its placement on the books and records of Valley Gas. As the transaction remains subject to Commission approval, Valley Gas customers are not yet Ohio Valley Gas customers, and Ohio Valley Gas has not undertaken independent customer notification prior to that approval. Ohio Valley Gas will notify Valley Gas customers regarding the acquisition following a consummation of the transaction.

Witness: John T. Stenger

DATA REQUEST

PSC 1_3

Refer to the Joint Application, pages 3–4. Provide the complete Banning Engineering appraisal report.

RESPONSE

The complete Banning Engineering appraisal report, prepared in connection with Ohio Valley Gas Corporation's evaluation of the Valley Gas asset acquisition, is attached as OVG_R_PSCDR1_3_Attachment1. The report is a single document and represents the complete appraisal as commissioned by Ohio Valley Gas Corporation.

Witness: John T. Stenger

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PUBLIC NATURAL GAS SYSTEM FACILITIES INVENTORY/VALUATION

OF

VALLEY GAS, INC., LOCATED IN IRVINGTON, KENTUCKY

AS OF NOVEMBER 2024

PREPARED FOR:

OHIO VALLEY GAS

November 2024

Return of Appraisement

The undersigned appraiser Jeffrey A. Banning, P.E. hired by Ohio Valley to make a just and true evaluation of the Valley Gas, Inc. natural gas system located in Irvington, Kentucky including the following assets:

- Gas Mains Including Valves,
- Gas Service Meters
- Gas Service Lines
- Regulator Stations, and
- An Odorizer.

The above facilities were appraised on the basis of facilities in existence as of the date of this return of appraisement based on GIS and Google Earth files provided by Ohio Valley Gas and/ or Valley Gas, Inc. and a site visit which occurred on October 31, 2024.

Having made an on-site inspection of the Valley Gas, Inc. facilities; having reviewed all necessary and pertinent books, maps, records, and reports; and having discussions with the owners of Valley Gas, Inc. about the natural gas utility assets and the scope of appraisal, we, the undersigned, now find that the just and true valuation of the Valley Gas, Inc. Gas Utility, as listed above is $1,030,000.00, rounded to the nearest $1,000.

Jeffrey A. Banning
Kentucky Registered Professional Engineer
PE # 20500

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TABLES

APPENDICES

Section One – Introduction

The Ohio Valley Gas Corporation, also known as OVG, provides natural gas distribution and transportation services to residential, commercial, industrial, and governmental customers in 16 Indiana counties and 1 county in Ohio.

OVG is considering the purchase of Valley Gas Corporation's gas utility assets located in Irvington, Kentucky. The majority of the system was installed in 1965, with other mains installed through 2021. The system currently serves 475 Customers. Valley Gas currently purchases gas from a pipeline provider with 3 regulator stations, 1 Mago meter with a regulator station, an odorizor and various valves included in the system along with gas mains, service lines and gas meters.

The purpose of this valuation is to provide OVG information on the estimated value of Valley Gas as of November 2024. OVG retained Banning Engineering as its engineer to complete this inventory and valuation of the natural gas utilities. The following sections represent a description of the utility as well as the supporting documentation for the value of the utility and its assets.

Section Two – Service Area

Valley Gas is located in Irvington, Kentucky, approximately 50 miles southwest of Louisville, Kentucky. The service area is as shown in Figure 1 in the attached Appendix A.

Section Three – Scope of the Valuation

Banning Engineering entered into a contract with OVG to prepare a valuation of Valley Gas as of November 2024. The scope of services to be provided in that appraisal includes the following:

1. Meet with OVG and Valley Gas to gather information and view the above grade natural gas utility assets.
2. Review existing reports, maps, financial information, and other documents related to the gas utility as applicable.
3. Prepare a valuation report that will include a description of the natural gas utility assets, assumptions, method of valuation, and determined valuation as of November 2024. The description of the natural gas utility asset includes, as available, the type, quantity, and age of the various asset classes. The appraisal would be based on information provided by OVG and/or Valley Gas.
4. Submit an electronic copy of the Appraisal Report to Ohio Valley Gas Corporation.

Jeff Henson, Vice President of Operations with Banning Engineering made a site visit to Valley Gas in Irvington, Kentucky on October 31st, 2024. He met with one of the owners, Kevin Kasey, who took him on a tour of the facilities, provided information on the system and answered numerous questions.

Section Four – Existing Natural Gas Facilities

OVG is considering the purchase of Valley Gas which includes the following: 2 regulator stations, an odorizor; and a natural gas distribution system which includes mains, customer service lines and meters.

The following reports and/or information listed below were provided by OVG/Valley Gas:

- Map (CAD and Google Earth files)

A summary of the Valley Gas natural gas system infrastructure includes the following:

- 3 Regulator Stations
- 1 Mago Meter with Regulator Station
- 66,612 feet of steel gas main
- 18,197 feet of plastic gas main
- 18 valves
- 475 service lines
- 475 meters
- A detailed description of each of the major system components of the natural gas system is presented in the following sections.

Gas Distribution

Approximately 80% of the mains were constructed in the 1960's. Since that time several main extensions and other improvements have occurred. The original 3 regulator stations for the distribution system were installed in 1965. The regulator station originally built in 1965 that is located along Highway 60 on the east edge of town, was rebuilt in 2015. An additional regulator station and large meter to provide service to the asphalt plant north of town, was installed in 2015. An odorizor was also installed as part of the original system and is located at the purchase point from the gas pipeline. The gas distribution mains range in size from 3/4-inch diameter to 6-inch diameter and includes numerous valves. The system also consists of service lines and meters to serve the customers of the system. The distribution system provides gas service to an estimated 475 customers. A complete listing of the utility assets is included in this report. A map of the gas distribution system can be seen in Figure 1 in the attached Appendix A.

Section Five – Valuation Method

The valuation method utilized for the appraisal of the Valley Gas natural gas system is the depreciated current replacement cost basis of system valuation. This valuation method has been used in determining the fair purchase value of utilities in many acquisition transactions. The utilities' financial records did not provide enough detail to allow their use for an asset listing. Given the age of the system and lack of adequate financial records to support asset value of the utility assets, this method is recommended as the most appropriate means to determine the value of the system. The information was provided by OVG and Valley Gas, and pricing information was collected from contractors and vendors. Engineering judgments and assumptions were also used to identify the value of the facilities in as much detail as possible.

In general, when determining depreciation, the expected useful life of each type of asset in the system is considered. The valuation is as of November 2024, and the balance of useful life of the assets is determined and used to calculate the depreciated value of the assets.

Invoices for the upgrades to one of the original regulator stations and the installation of a new regulator station were provided to Banning Engineering as part of this appraisal. These invoices are included in Appendix C. The Construction Cost Index (CCI) provided by Engineering News-Record was used to adjust the costs to November 2024 dollars. This is a commonly used method of adjusting historical "true" costs to current day costs. The maintenance at the original regulator station is assumed to have a useful life of 50 years.

Table 5-1
Utility Valuation - Estimated Useful Life

Pipe Material	Useful Life (Yrs)
Plastic (Poly) Gas Main (2009-2021)	75
Steel Gas Main	50

Table 5-2
Utility Valuation - Estimated Useful Life

Asset	Useful Life (Yrs)
Regulator Stations	50
Odorizer	50
Service Lines	65
Meters	10

Section Six – Estimated Utility Valuation

The results for the recommended utility valuation for Vally Gas are given below in Table 6-1.

Tables 6-1
Gas Valuation Tables

Gas Distribution Mains									
Install Year	Size	Material	Length (Feet)	Service Life	Percent Life Remaining	Unit Cost - Per Foot	Replacement Cost New	Depreciation	R.C.N.L.D
1965	3/4"	Steel	304	50	0%	$ 40.00	$ 12,160	$ 12,160.00	$ -
1965	1"	Steel	769	50	0%	$ 40.00	$ 30,760	$ 30,760.00	$ -
1965	2"	Steel	39,266	50	0%	$ 70.00	$ 2,748,620	$ 2,748,620.00	$ -
1965	3"	Steel	14,585	50	0%	$ 75.00	$ 1,093,875	$ 1,093,875.00	$ -
1965	4"	Steel	11,688	50	0%	$ 80.00	$ 935,040	$ 935,040.00	$ -
2009	2	Plastic	3,196	75	80%	$ 30.00	$ 92,640	$ 18,528.00	$ 74,112.00
2015	3/4"	Plastic	407	75	88%	$ 20.00	$ 7,880	$ 946.00	$ 6,934.00
2015	2	Plastic	2,626	75	88%	$ 30.00	$ 76,110	$ 9,133.00	$ 66,977.00
2015	4	Plastic	5,660	75	88%	$ 40.00	$ 218,760	$ 26,251.00	$ 192,509.00
2015	6	Plastic	6,308	75	88%	$ 60.00	$ 365,700	$ 43,884.00	$ 321,816.00
2021	2	Plastic	636	75	96%	$ 20.00	$ 12,280	$ 491.00	$ 11,789.00
							Sub-Total		$ 674,137.00
							8% Soft Costs Contingency		$ 53,931.00
							Gas Distribution Main Total		$ 728,068.00

Tables 6-1
Gas Valuation Tables

Item	Quantity	Install Year	Service Life	Percent Life Remaining	Replacement Cost New - Unit Cost	Total Replacement Cost New	Depreciation	R.C.N.L.D.
Service Lines	398	1965	65	9%	$ 2,000.00	$ 796,000.00	$ 722,523.00	$ 73,477.00
Meters	398	1965	10	0%	$ 125.00	$ 49,750.00	$ 49,750.00	$ -
2 " Valves	1	1965	65	9%	$ 800.00	$ 800.00	$ 726.00	$ 74.00
4 " Valves	1	1965	65	9%	$ 900.00	$ 900.00	$ 817.00	$ 83.00
Regulator Station on Irvington-Bewelyville Road	1	1965	50	0%	$ 10,000.00	$ 10,000.00	$ 10,000.00	$ -
Regulator Station on Sim Dowell Road	1	1965	50	0%	$ 15,000.00	$ 15,000.00	$ 15,000.00	$ -
Service Lines	24	2009	65	77%	$ 2,000.00	$ 48,000.00	$ 11,077.00	$ 36,923.00
Large Service Line	1	2009	65	77%	$ 3,500.00	$ 3,500.00	$ 808.00	$ 2,692.00
Meters	24	2009	10	0%	$ 125.00	$ 3,000.00	$ 3,000.00	$ -
Large Meter	1	2009	10	0%	$ 2,300.00	$ 2,300.00	$ 2,300.00	$ -
Service Lines	50	2015	65	86%	$ 2,000.00	$ 100,000.00	$ 13,846.00	$ 86,154.00
Large Service Line	1	2015	65	86%	$ 3,500.00	$ 3,500.00	$ 485.00	$ 3,015.00
Meters	50	2015	10	10%	$ 125.00	$ 6,250.00	$ 5,625.00	$ 625.00
Large Meter	1	2015	10	10%	$ 2,300.00	$ 2,300.00	$ 2,070.00	$ 230.00
2" Valves	1	2015	65	86%	$ 800.00	$ 800.00	$ 111.00	$ 689.00
4" Valves	13	2015	65	86%	$ 900.00	$ 11,700.00	$ 1,620.00	$ 10,080.00
6" Valves	2	2015	65	86%	$ 1,000.00	$ 2,000.00	$ 277.00	$ 1,723.00
Service Lines	1	2021	65	95%	$ 2,000.00	$ 2,000.00	$ 92.00	$ 1,908.00
Meters	1	2021	10	70%	$ 125.00	$ 125.00	$ 38.00	$ 87.00
Odorizer	1	1965	50	0%	$ 20,000.00	$ 20,000.00	$ 20,000.00	$ -
Regulator Station near Asphalt Plant	1	2015	50	82%	$ 39,656.00	$ 39,656.00	$ 7,138.00	$ 32,518.00
Upgrades to Regulator Station installed in 1965	1	2015	50	82%	$ 34,697.00	$ 34,697.00	$ 6,245.00	$ 28,452.00
						Sub-Total		$ 278,730.00
						8% Soft Costs Contingency		$ 22,298.00
						Total		$ 301,028.00

Total Gas Utility Valuation	
Distribution Mains	$ 728,068.00
Miscellaneous Items	$ 301,028.00
Total	**$ 1,029,096.00**

Section Seven – Summary of Valuation

Table 7-1 presents a summary of the valuation of the Valley Gas natural gas utility based on the Depreciated Replacement Cost Method for assets as of November 2024. As discussed in Section 5, the Depreciated Replacement Cost Method is recommended as an appropriate and fair measure for determining the current net value of the natural gas facilities.

Table 7-1
Valley Gas Natural Gas Utility Valuation

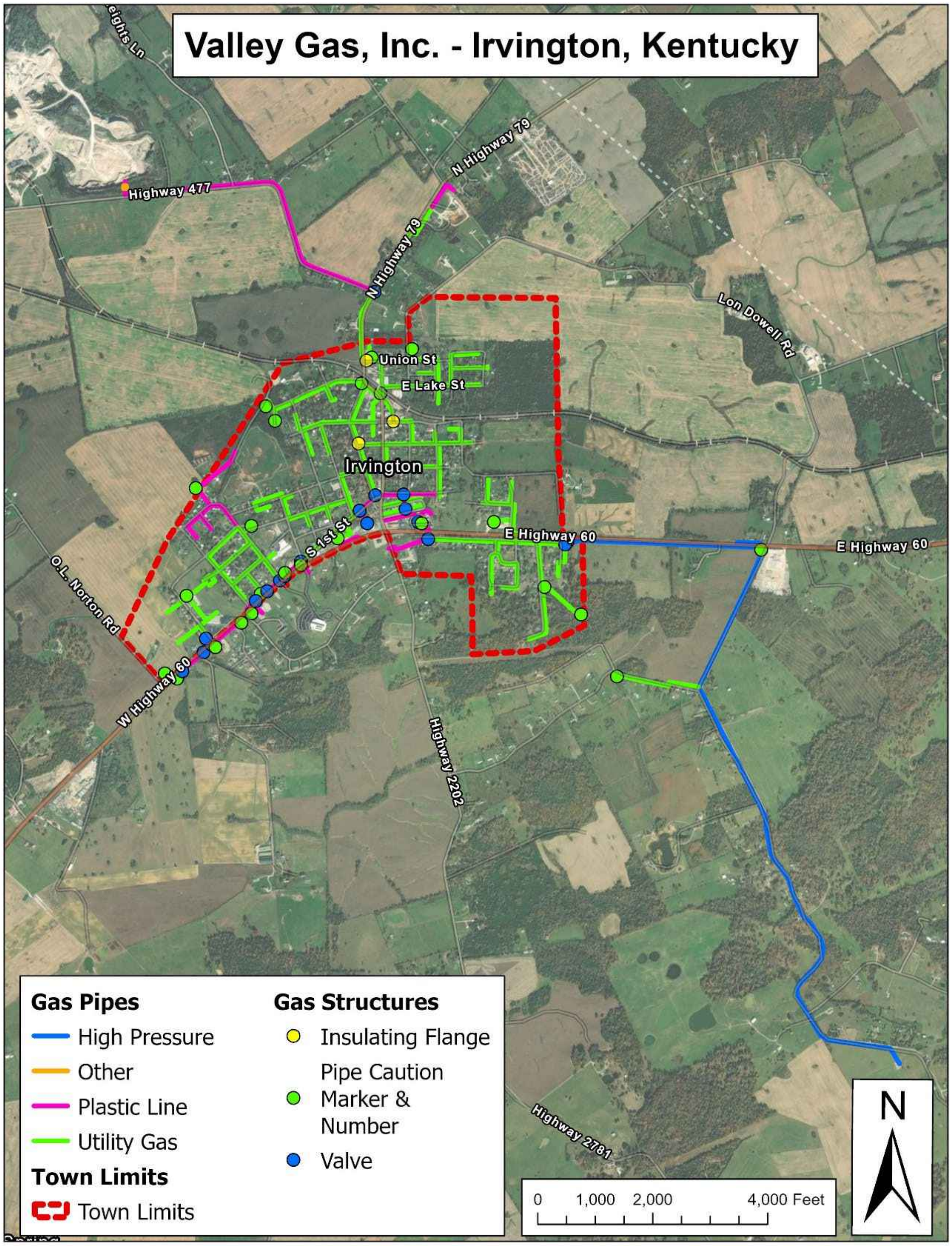
Summary of Depreciated Replacement Cost Valuation	
Net Present Value (Rounded to Nearest $1,000)	**$1,030,000**

Based on the appraiser's valuation and analysis of the gas utility assets, the estimated value of Valley Gas assets as of November 2024, is **$1,030,000** as shown in Table 7-1 above.

APPENDIX A

DISTRIBUTION SYSTEM MAP

FIGURE 1: GAS SERVICE AREA MAP



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APPENDIX B

PHOTO LOG

PHOTO 1: REGULATOR STATION INSTALLED IN THE 1960'S AND UPGRADED IN 2015.

PHOTO 2: PHOTO OF THE NEW REGULATOR STATION INSTALLED IN 2015 AT THE NORTHWEST CORNER OF THE SERVICE AREA.

PHOTO 3: PHOTO OF THE NEW REGULATOR STATION INSTALLED IN 2015 AT THE NORTHWEST CORNER OF THE SERVICE AREA.

PHOTO 4: PHOTO OF THE NEW REGULATOR STATION INSTALLED IN 2015 AT THE NORTHWEST CORNER OF THE SERVICE AREA.

PHOTO 5: ODORIZOR LOCATED AT THE PIPELINE GAS PURCHASE SITE BUT OWNED BY VALLEY GAS.

PHOTO 6: REGULATOR STATION ALONG SIM DOWELL ROAD.

PHOTO 7: REGULATOR STATION ALONG IRVINGTON BEWELYVILLE ROAD

PHOTO 8: METER LOCATED AT HOUSING DEVELOPMENT.

PHOTO 9: TYPICAL CUSTOMER METER.

APPENDIX C

Invoices for the installation of new original regulator station in 2015 and maintenance to the original regulator station in 2015.

2371 Irvine Rd.
Richmond, KY 40475
Shawn Martin
Owner

Martin Contracting Inc.

(Tel) 859-623-0112
(Cell) 606-305-6434
(Fax) 859-626-0822
shmartin1@bellsouth.net

Invoice #15008

DATE
28-Jan-15

BILL TO:
Valley Gas, Inc.
401 S. 1st Street
Irvington, KY

ATTENTION: Kerry Kasey

MC Job Number
14524

DESCRIPTION	QTY	RATE	TOTAL
Regulator @ Mago Asphalt			
Work completed through January 23, 2015			
Regulator portion of meter set at Mago Asphalt	LS		$29,357.38
Breakdown	Paid check # 8646 2-28-15		
Material: $18,714.65			
Labor: $5,243.00			
Equipment: $1,460.00			
x Overhead 5% $26,688.53			
x Profitt 10% $29,357.38			

TOTAL $29,357.38

APPENDIX C

Invoices for the installation of new original regulator station in 2015 and maintenance to the original regulator station in 2015.

2371 Irvine Rd.
Richmond, KY 40475
Shawn Martin
Owner

Martin Contracting Inc

(Tel) 859-623-0112
(Cell) 606-305-6434
(Fax) 859-626-0822
shmartin1@bellsouth.net

Invoice #15007

DATE
28-Jan-15

BILL TO:
Valley Gas, Inc. 401 S. 1st Street Irvington, KY ATTENTION: Kerry Kasey

MC Job Number
14524

DESCRIPTION	QTY	RATE	TOTAL
Town Border Station			
Work completed through January 23, 2015			
Upgrades to existing Town Border Station	LS		$25,685.64
Breakdown			
Material: $15,535.65			
Labor: $5,243.00			
Equipment: $1,460.00			
x 5% $23,350.62			
x 10% $25,685.64			

PAid
Check 8645
2-28-15

TOTAL $25,685.64

DATA REQUEST

PSC 1_4

Refer to the Joint Application, page 13.

a. Provide Valley Gas's initial asking price and explain what specific factors drove the negotiated price to $800,000.

b. Provide all calculations in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

RESPONSE

a. Valley Gas's owners and its advisors discussed a general expectation of an asking price in the $1.2 million range. Through arms-length negotiations conducted between unrelated parties, the final purchase price was agreed at $800,000, subject to closing and post-closing adjustments. Several specific factors drove the negotiated price below the initial asking price.

   First, the age and condition of the Valley Gas system resulted in a relatively low net book value of $72,323.14, representing the original cost of Valley Gas utility plant-in-service net of accumulated depreciation. The high level of asset depreciation reflects the age of the assets and a relatively low level of recent investment in rate base.

   Second, the Banning Engineering appraisal, utilizing the Replacement Cost New Less Depreciation methodology, established an appraised value of approximately $2,191 per customer. At the negotiated price of $800,000, the per-customer cost to OVG is approximately $1,702, which is below the appraised value and below what it would cost OVG to extend service to new customers.

b. An excel spreadsheet showing the calculations that were used to derive the purchase price does not exist.

Witness: John T. Stenger

DATA REQUEST

PSC 1_5

Refer to the Joint Application pages 11–13.

a. Provide the list of specific capital improvement projects Ohio Valley Gas identified as necessary, including their estimated costs and implementation timelines, and how does Ohio Valley Gas intend to fund these improvements.

b. Provide the calculation the anticipated total rate impact on a residential customer over the 10-year Gas Plant Acquisition Adjustment (GPAA) amortization period when combined with the return component and projected future capital improvement rate increases.

c. Explain the valuation methodology or methodologies used in addition to Replacement Cost New Less Depreciation (RCNLD). Include the assumptions underlying the estimated value of approximately $2,191 per customer, and describe any alternative valuation approaches that were considered, including the reasons for their use or rejection.

RESPONSE

a. The expected improvements that Ohio Valley Gas has identified for Valley Gas are OVG owned pressure regulation and overpressure protection at the Texas Gas purchase site and the eventual installation of an odorant injector to replace the current bypass system. Pressure regulation and overpressure protection for the Valley Gas high pressure system is currently controlled by Texas Gas. OVG would develop a project to either acquire the regulation station, or design and install its own station, thus ensuring that OVG personnel are maintaining the regulator station. OVG has not generated estimates for these two improvements. However, they were identified during the due diligence site visit and are projects that OVG would eventually seek to implement.

b. Because project cost estimates have not been completed, this calculation has not been done.

c. Please see the response to DR 1-23.

Witness: Gregory A. Bailey

DATA REQUEST

PSC 1_6

Refer to the Joint Application at 16. Explain how Ohio Valley Gas is in a stronger position to raise capital at lower rates than Valley Gas.

RESPONSE

Ohio Valley Gas Corporation is in a stronger position to raise capital at lower rates than Valley Gas because OVG is a larger, established regulated natural gas utility with a broader customer base, a larger and more diversified revenue stream, established banking and lending relationships, access to an operating line of credit, and recent regulatory authority to issue long-term debt. OVG currently provides natural gas service to approximately 36,000 customers in Indiana and Ohio, compared to Valley Gas's approximately 470 customers in Kentucky.

OVG's ability to obtain capital on reasonable terms is evidenced by the Indiana Utility Regulatory Commission's recent approval of OVG's request for long-term financing authority in the principal amount of $25,000,000. OVG also has an established cost of debt of approximately 5.33%. By contrast, Valley Gas does not have long-term debt reflected in its capital structure and, due to its small size, limited customer base, and limited internal financial resources, would generally need to rely on cash flow or shorter-term financing to fund significant repairs, replacements, or system improvements.

This difference is important because the Valley Gas system will require prudent capital investment over time, including improvements related to overpressure protection, odorization, safety, reliability, and ongoing compliance. OVG's size, financial position, and access to capital allow it to finance those investments in a more cost-effective and structured manner than Valley Gas could reasonably achieve as a small, stand-alone utility.

OVG's stronger capital position also reduces long-term financial risk for customers. Necessary system investments can be planned, financed, and executed through OVG's normal capital planning and utility financing processes, rather than being constrained by Valley Gas's limited cash flow or the availability and cost of short-term borrowing. As a result, OVG is better positioned to fund necessary system improvements while continuing to provide safe, reliable, and reasonable utility service to Valley Gas customers.

Witness: Steven P. James

DATA REQUEST

PSC 1_7

Refer to the Joint Application, page 16. Provide a comparison showing the difference between the rates charged to Ohio Valley Gas from NextEra Energy Services and the rates charged to Valley Gas from its current natural gas supplier.

RESPONSE

Ohio Valley Gas purchases natural gas under fixed-price contracts to reduce exposure to volatility in the natural gas market. NextEra Energy Services provides these services for a fee of $0.04 per MMBtu, consisting of a $0.03 scheduling fee and a $0.01 management adder. These services include procuring fixed-price natural gas contracts on behalf of Ohio Valley Gas. Valley Gas currently purchases natural gas through Constellation, which manages its natural gas supply portfolio. Ohio Valley Gas is in the process of determining the rates charged to Valley Gas from Constellation and will supplement this response.

Witness: John T. Stenger

DATA REQUEST

PSC 1_8

Refer to the Application, Exhibit 2, Schedule 2.01(e). Refer also to the Joint Application, Exhibit 2, Schedule 4.07. Explain whether Ohio Valley Gas intends to continue each of the active contracts listed on Schedule 2.01(e) and Schedule 4.07.

RESPONSE

Schedule 2.01(e) – Assigned Contracts

1. Master Retail Natural Gas Supply Agreement with Constellation NewEnergy – Gas Division, LLC (and all supplements and transaction confirmations thereto).

Although the application indicates that OVG may not continue with Constellation NewEnergy in the long term, Ohio Valley Gas holds the option to continue to utilize Constellation NewEnergy. Ohio Valley Gas will assume this agreement and will operate under its terms for an undetermined period of time.

Ohio Valley Gas currently procures natural gas supply through NextEra Energy Services for its existing Indiana operations and holds significant contracts with Texas Gas Transmission, the same system that Valley Gas receives natural gas from. At some point, we believe it makes sense to transition the Valley Gas service territory to its existing supply arrangement with NextEra Energy Services, which Ohio Valley Gas expects will result in more favorable commodity pricing for ratepayers.

2. Texas Gas Transmission, LLC Transportation Agreement (Contract No. 940, dated November 1, 1993, as amended).

Ohio Valley Gas must continue this agreement. The Texas Gas transportation agreement is essential to the ongoing receipt and delivery of natural gas to the Valley Gas distribution system. This agreement will remain in place at closing and will continue to operate under its terms.

3. Mago Agreement (dated September 26, 2014, as amended by Amendment No. 2 dated February 16, 2024) and Supplemental Agreement for Gas Pipeline Construction, Cost Reimbursement and Operation (dated September 26, 2014), each by and between Valley Gas, Inc. and Mago Construction Company.

The referenced agreements will remain in place at closing. These agreements govern the transportation and delivery of natural gas to the Mago Construction Company facility and were approved by this Commission in Case No. 2014-00368. Ohio Valley Gas will honor all terms of both agreements, including the automatic renewal provisions under the Mago Agreement and the rate structure established under Amendment No. 2, which was approved by this Commission on June 27, 2024. Ohio Valley Gas will also honor the obligations of the Supplemental Agreement, including the Restricted Period covenant through September 26, 2044.

4. Approximately 471 Residential Customer Service Agreements.

Ohio Valley Gas intends to continue service to all existing Valley Gas residential customers pursuant to the terms of their existing service agreements. Customer service will be uninterrupted at consummation of the acquisition.

Schedule 4.07 – Other Contracts

1. Transition Services Agreement, dated February 3, 2026, by and between Valley Gas, Inc. and Irvington Gas Acquisition Company, LLC.

Ohio Valley Gas does not intend to continue this agreement following consummation of the acquisition. The Transition Services Agreement was established to facilitate administrative and operational management of Valley Gas during the pre-closing period. Upon consummation of the acquisition, Ohio Valley Gas will assume direct operational responsibility for all functions currently performed under this agreement, including meter reading, invoicing, collections, payment processing, financial reporting, record keeping, vendor coordination, and customer communications.

2. Agreement with Utility Safety Design, Inc. ("USDI") for compliance supervision.

Ohio Valley Gas intends to not continue with the five-year supervision requirement with USDI, provided this approach is acceptable to the Kentucky Public Service Commission. OVG intends to utilize its extensive knowledge of pipeline safety and proven compliance record operating natural gas systems consisting of approximately 1,285 miles and approximately 36,000 customers to operate the Valley Gas system safely and in compliance with all federal and state codes.

3. Software License Agreement with Rural Computer Consultants, Inc. ("RCC"), dated July 25, 2008, and related invoices for RCC Software Subscription and Web Services, Cloud Host/Disaster Recovery, and MOGO Software.

Ohio Valley Gas does not intend to continue the RCC software agreements following consummation of the acquisition. Ohio Valley Gas utilizes its own established billing, customer information, and operational software systems for its existing Indiana operations and intends to transition the Valley Gas service territory onto those platforms following closing. Ohio Valley Gas will ensure that all customer billing records and service history are fully preserved and accessible during and after this transition.

Witness: John T. Stenger

DATA REQUEST

PSC 1_9

Refer to the Joint Application, Exhibit 2, Schedule 4.04 Financial Statement Matters.

a. Explain how the net book value of $72,323.14 was calculated, including the data sources, assumptions, and methodology used.

b. Given the acknowledged deficiencies in Valley Gas's financial records, including the use of cash-basis accounting and the absence of a proper fixed-asset reconciliation, explain the basis for Ohio Valley Gas's confidence in the accuracy and reliability of this figure.

RESPONSE

The net book value of $72,323.14 was calculated using Valley Gas's reported utility plant-in-service, less accumulated depreciation, as reflected in Valley Gas's 2025 Annual Report filed with the Commission.

The calculation is as follows:

Description	Amount
Utility plant-in-service	$ 454,389.65
Less: Accumulated depreciation	$(382,066.51)
Net book value	$ 72,323.14

OVG used the reported original cost of Valley Gas's utility plant-in-service, net of accumulated depreciation, for purposes of calculating the proposed acquisition premium component of the Gas Plant Acquisition Adjustment. No appraisal, replacement cost, fair value, or purchase accounting adjustments were included in this net book value calculation.

OVG recognizes that Valley Gas's financial records have limitations, including the use of cash-basis accounting and the absence of complete fixed asset reconciliation. OVG's reliance on the $72,323.14 amount is that it ties directly to Valley Gas's 2025 Annual Report and is consistent with OVG's understanding that the Valley Gas system is an older system with a relatively low level of recent investment in rate base.

OVG did not rely solely on net book value to evaluate the reasonableness of the purchase price. OVG also considered the Banning Engineering valuation and appraisal of the Valley Gas system, which supported a value higher than the negotiated purchase price.

OVG will work with Valley Gas to provide the detailed plant-in-service ledger and depreciation support requested by the Commission. If additional review identifies any necessary correction or update to the reported net book value, OVG will supplement this response as appropriate.

Witness: Steven P. James

DATA REQUEST

PSC 1_10

Refer to the Joint Application, Exhibit 2, Schedule 4.07 Other Contracts. Given Valley Gas's ongoing five-year compliance supervision requirement with Utility Safety Design, Inc. (USDI) through April 2028.

a. Explain whether Ohio Valley Gas plans to continue the arrangement.

b. If so, provide the estimated cost and if those costs will be requested to be recovered through rates.

RESPONSE

a. Please refer to OVG's response regarding its Agreement with USDI under Data Request PSC 1-8.

b. Not applicable.

Witness: Gregory A. Bailey

DATA REQUEST

PSC 1_11

Refer to the Joint Application, page 5.

a. Explain what impact is anticipated on Tell City district staffing.

b. Explain whether any new hires or dedicated personnel be assigned specifically to the Irvington service territory.

c. Explain what specific emergency response plan(s) for Valley Gas customers will be in place to handle emergencies, given the approximately 42-mile/55-minute distance from Tell City.

RESPONSE

a. The Tell City District of Ohio Valley Gas has sufficient personnel to serve the community of Irvington. The anticipated impact will be minimal to OVG personnel.

b. New hires will not be required. OVG will not assign a specific person to Irvington but will familiarize multiple personnel with the Valley Gas system.

c. OVG’s current emergency response plan requires arrival to the site of an “emergency” no later than 1 hour after receiving the call. This requirement is documented in OVG O&M Standard L615 Part A Section 3, which is attached as OVG_R_PSCDR1_11_Attachment1. OVG will operate the Valley Gas system under its current O&M procedures.

Witness: Gregory A. Bailey

OHIO VALLEY GAS CORPORATION

GAS EMERGENCY PLAN – PART A (GENERAL PROCEDURES)

Reference: OVG Standard No. L (601) - "General Requirement for the Operations of Pipelines"

1. Purpose: To set forth the requirements and procedures for handling gas emergencies within Ohio Valley Gas.

2. Discussion: A gas emergency is defined as an event or series of events that result(s) in one or more of the following:
   a. Hazardous gas leak(s) (defined as a Grade 1 leak after initial onsite assessment)
   b. Pipeline break
   c. Abnormally high or low pressure in the distribution system
   d. Concentration of gas within or near (below grade within five (5) feet of a foundation) a building
   e. Natural Disaster.
   f. Terrorist Attack.
   g. Fire located near (within proximity to cause damage) or directly involving a pipeline facility.
   h. Explosion occurring near (within proximity to cause damage) or directly involving a pipeline facility.

   Reviews for gas emergencies will be defined below in section 7.

3. Abnormal Operations: This manual is required to include procedures for the response to operations that are considered abnormal. These abnormal operations are defined as follows:
   a. An unintended closure of valve or shutdown.
   b. An increase or decrease in pressure or flow outside of normal operating limits.
   c. A loss of communication.
   d. The operation of any safety device.
   e. Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error, which may result in a hazard to persons or property.

   Procedures:

   a. Unintended Closures of Valves or Shutdowns: OVG Standard L615 Part D describes the actions necessary to deal with the unintended closure of valve(s) or system shutdowns.
   b. An Increase or Decrease in Pressure or Flow Outside of Normal Operating Limits: Should an increase or decrease in pressure or flow outside of normal operating limits be reported, it shall be addressed like any other

emergency. An investigation shall immediately take place to determine the cause of the abnormality. If appropriate, the pipeline supplier shall be contacted and informed of the problem and the operator shall take whatever other steps necessary to return pressures and/or flows to normal. Actions could include:

1. Regulator station inspections.
2. Pipeline Patrols
3. Leakage Surveys
4. Contacting pipeline suppliers or large volume customers to obtain additional information

c. A Loss of Communication: There is no remotely controlled equipment in any OVG systems. A loss of communication should not affect the operation of the system. Any loss of communications to metering or pressure monitoring equipment shall result in monitoring by physically visiting the unit(s) as often as necessary to ensure safe operation of the system.

d. The Operation of Any Safety Device: Safety devices in OVG's system include both pressure regulators and pressure relief valves. Whenever a safety device operates it shall always first be assumed that the device was performing as a normal response to an abnormal operating condition. The cause of the abnormal operating condition shall be determined and, if appropriate, removed prior to the reset, replacement, or temporary disabling of any safety device. Instructions for inspection and maintenance of these safety devices can be found in OVG Standard M739 and M740.

e. Any Other Foreseeable Malfunction of a Component, Deviation from Normal Operation, or Personnel Error, which may Result in a Hazard to Persons or Property: OVG Standard N803 Enclosure 001 includes a current list of appropriate responses for any other foreseeable AOCs. It may be necessary at times to develop a "field" response to an unpredictable event. When this becomes necessary, all or some of the procedures, safety precautions, and information provided by this entire O&M Manual may be necessary, useful, and should be considered, as well as input from either the appropriate District Superintendent or the Engineering Department, when formulating an action plan for the elimination of the abnormal operating condition.

Response Review: Each abnormal operation encountered during any gas emergency shall be documented and reviewed per the Post-Emergency Response Review processes defined in this Standard. Abnormal operations encountered during normal day-to-day operations shall be documented per the Repair Map Documentation process defined in OVG Standard N803. All abnormal operations documented on the Repair Map shall be reviewed annually conducted concurrently with the annual O&M review described in OVG Standard 0005. These reviews may result in changes or additions to the list found in OVG Standard N803 Enclosure 001 previously mentioned.

And that additionally results in or threatens the following:

a. Damage to persons and property (e.g. Explosion(s) and/or Fire(s))
b. Loss of pressure in an OVG distribution system (outages)
c. Exceeding the MAOP of an OVG distribution system

A gas emergency calls for immediate and appropriate response in order to prevent or limit damage and threat(s). OVG response shall be given the highest priority at all times. OVG Districts shall be prepared to respond or provide help to all types of emergencies. They shall follow Part B of this Plan to ensure that they are prepared and ready for an emergency of any type. OVG response time should be within one (1) hour of an emergency call and documentation in the Compliance tool of circumstances if the one (1) hour cannot be achieved.

4. Objectives: The primary objective(s) are listed in order of importance and are as follows:
   a. Protection of people
   b. Protection of property
   c. Shut down pipeline facilities (gas leak(s))
   d. Minimize the loss of gas
   e. Protection of pipeline facilities
   f. Repair of the damaged or malfunctioning equipment
   g. Safe restoration of essential service
   h. Complete restoration of service

5. Recognizing and Responding to a Potential Gas Emergency: Any OVGC employee who observes or receives news of:
   a. A gas leak or gas fumes within or near a building shall immediately initiate appropriate action per Part C of this Plan.

   b. Any other potential gas emergency such as:
      (1.) A gas pressure that is abnormally high or low

(2.) A damaged or malfunctioning component of OVGC distribution system (e.g., main, service, regulator station, meter setting, etc.)
(3.) An explosion or fire that could involve or threaten the OVGC distribution system
(4.) An asphyxiation that could be due to natural gas
(5.) A very alarmed customer

Shall immediately initiate action per Part D of this Plan.

6. Emergency Shut-off/Restoration of Service: During an emergency, the safe shut-off and restoration of service to OVG's customers is critical to the handling of the emergency itself. No restoration of service shall begin after an emergency until all applicable critical factors are considered and the safe restoration of service is possible. The Critical Factors to consider, including, but not limited to the following:
   a. Has the emergency situation been diffused, investigations completed, repairs been made, and can safe restoration of service be accomplished?
   b. If overpressure or natural disaster caused the emergency, has the entire distribution area affected been leak surveyed?
   c. If a service or main was disconnected from the distribution system, what are the pressure testing requirements for reinstating the service or main?
   d. Does the District have the manpower to accomplish the restoration of service in a timely manner? Consideration must be given to time of year and the weather associated with it.
   e. Does the District have a list of all of the customers disconnected /shut off during the emergency?
   f. If a section of distribution system was shut down, is District management and personnel 100% certain that all affected customers have been shut off via the stop at each meter set?

   After consideration to all these factors the District Leadership shall establish a Command Center and assemble the proper teams to begin emergency procedures under Part D of this Standard.

7. Post-Emergency Response Review: As soon as practicable after each emergency, District Managers, District Superintendents and, if necessary, the Engineering Department shall conduct a review of emergency procedures to ensure that OVG's emergency procedures properly addressed the emergency and that they were followed during the emergency. Said review shall be documented with OVG Form #11 – "Post-Emergency Response Review Form." If the existing emergency procedures did not properly address an emergency, changes and/or alternate procedures shall be noted for implementation.

OHIO VALLEY GAS CORPORATION

The Engineering Department shall review and, if necessary, consult with the respective District on their suggested changes to the emergency procedures and make any necessary revisions to the existing emergency procedures. If a change to existing emergency procedures occurs, the Engineering Department shall re-issue OVG Standard L615 with the changes highlighted for easy review by all Districts.

8. Failure Investigation: If OVG experiences a "failure" of a pipeline or a pipeline component and cannot easily determine the cause of the failure, OVG will, as soon as practicable, conduct a "failure investigation" to determine the cause of the failure. After the end of the "failure" emergency, OVG shall select samples of the failed pipeline, pipeline component or equipment for laboratory examination. These samples will be for the purpose of determining the cause(s) of the failure and minimizing the possibility of a recurrence. Failure investigation procedures are included in OVG Standard L617.

DATA REQUEST

PSC 1_12

Refer to the Joint Application, generally, and given that Ohio Valley Gas has limited or no prior experience operating under Kentucky Public Service Commission (KYPSC) jurisdiction.

a. Explain the steps it has taken to become familiar with KYPSC regulatory requirements, including 807 KAR 5:006.

b. Explain how Kentucky-specific compliance obligations such as gas cost adjustment filings and annual reporting be managed going forward.

RESPONSE

a. OVG recognizes that the acquisition of Valley Gas will require it to comply with Kentucky Public Service Commission requirements. In preparation, OVG has worked with Kentucky regulatory counsel and reviewed Valley Gas's existing tariff, annual reports, purchased gas adjustment filings, recent Commission filings, and applicable Kentucky regulatory requirements, including 807 KAR 5:006.

b. Following closing, OVG will assign responsibility for Kentucky compliance to its internal regulatory, accounting, gas supply, customer service, engineering, and operations personnel, with continued support from Kentucky regulatory counsel as needed. OVG will use a compliance calendar to track recurring Kentucky filing obligations, including gas cost adjustment filings, annual reports, tariff requirements, and other Commission reporting deadlines.

Gas cost adjustment filings will be managed by OVG's gas supply and accounting personnel, with regulatory review. Annual reporting will be managed by OVG's accounting team, with management and counsel review as appropriate. Operational and safety compliance will be managed by OVG's operations and engineering personnel.

OVG will maintain Kentucky-specific records for the Valley Gas service territory and will continue to work with Kentucky regulatory counsel to ensure Kentucky-specific obligations are identified and completed on a timely basis.

Witnesses: John T. Stenger and Steven P. James

DATA REQUEST

PSC 1_13

Refer to the Joint Application, pages 10–11. Valley Gas customers currently have local billing and payment options through the propane company. Explain the specific payment and billing options will Ohio Valley Gas provide to Irvington customers following the transaction, given that its existing operations are primarily based in Indiana.

RESPONSE

Upon completion of the acquisition, customers in the Irvington service area will have access to multiple payment options. Payments may be made online, by mail, by check mailed to the Tell City office, or in person at the nearest Ohio Valley Gas office.

Witness: John T. Stenger

DATA REQUEST

PSC 1_14

Refer to the Joint Application, page 7, footnote 7. Explain why Exhibit 3 financial statements do not include the recent consolidation of Fountaintown Gas Company and South Eastern Indiana Natural Gas Company and provide updated consolidated financial statements reflecting Ohio Valley Gas's current financial position.

RESPONSE

Exhibit 3 to the Joint Application included OVG's 2025 year-end financial statements, which were the most recent completed annual financial statements available at the time the Application was prepared. Those financial statements did not include updated amounts reflecting the recent consolidation of Fountaintown Gas Company and South Eastern Indiana Natural Gas Company into OVG.

OVG does not currently have prepared consolidated financial statements available that reflect the completed consolidation of Fountaintown Gas Company and South Eastern Indiana Natural Gas Company. The consolidation occurred after the 2025 year-end reporting period, and updated consolidated financial statements have not yet been prepared in the ordinary course.

OVG will supplement this response when updated consolidated financial statements become available during the pendency of this proceeding. OVG's position remains that the consolidation does not change its financial, technical, or managerial ability to acquire and operate the Valley Gas system.

Witness: Steven P. James

DATA REQUEST

PSC 1_15

Refer to the Joint Application, page 11. Provide the calculation of Ohio Valley Gas's current weighted average cost of capital structure.

RESPONSE

OVG's weighted average cost of capital, as reflected in the capital structure schedule included in the settlement materials in IURC Cause No. 46011, is **8.6113%**. The calculation is shown below:

Class of Capital	Amount	Percent of Total	Cost Percentage	Weighted Cost
Long-Term Debt	$3,617,330.91	4.9903%	4.50%	0.2200%
Preferred Equity	$0.00	0.0000%	0.00%	0.0000%
Post-1970 ITC	$0.00	0.0000%	0.00%	0.0000%
Common Equity	$60,293,779.33	83.1791%	10.00%	8.3179%
Deferred Taxes	$7,688,748.66	10.6071%	0.00%	0.0000%
Customer Deposits	$886,848.40	1.2235%	6.00%	0.0734%
Total	**$72,486,707.30**	**100.0000%**		**8.6113%**

OVG is providing this schedule as the support for its weighted average cost of capital structure.

Witness: Steven P. James

DATA REQUEST

PSC 1_16

Refer to the Joint Application, page 13, Article 2.07. Consider this an ongoing request. When available, provide a copy of the Allocation Schedule as referenced in Article 2.07 of the APA.

RESPONSE

The Allocation Schedule referenced in Article 2.07 of the Asset Purchase Agreement has not yet been prepared. Under Section 2.07 of the Asset Purchase Agreement, OVG is required to prepare and deliver the Allocation Schedule to Valley Gas no later than thirty (30) days after the Purchase Price is finally determined pursuant to Section 2.06(b) of the Asset Purchase Agreement.

Because the transaction has not yet closed and the Purchase Price has not yet been finally determined, the Allocation Schedule is not yet available. OVG will supplement this response and provide the Allocation Schedule when it becomes available.

Witness: Steven P. James

DATA REQUEST

PSC 1_17

Refer to the Joint Application, page 14. Explain what amounts of the purchase price and the cost of operating Valley Gas's system will be funded by the revenue generated from the Valley Gas service territory itself. Provide the calculation in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

RESPONSE

The purchase price will be funded at closing by OVG through corporate funds, including existing cash from operations and, if necessary, its operating line of credit. No portion of the purchase price will be funded at closing from pre-closing Valley Gas service territory revenues.

Following closing, OVG will track the revenues, expenses, capital additions, and any approved acquisition adjustment recovery associated with the Valley Gas service territory separately. Subject to Commission approval, OVG seeks to recover the acquisition premium and related GPAA components from Valley Gas customers through Valley Gas rates over the requested 10-year recovery period, with a return as approved by the Commission.

Based on Valley Gas's 2025 Annual Report, the Valley Gas service territory generated $381,274.39 in annual operating revenues and incurred $336,348.14 in annual operating expenses. On that historical basis, revenues generated from the Valley Gas service territory funded 100% of reported annual operating expenses, with $44,926.25 of net operating income.

The supporting calculation is provided in OVG_R_PSCDR1_17_Attachment1.

Witness: Steven P. James

DATA REQUEST

PSC 1_18

Refer to the Joint Application, pages 14-15. State whether the estimated $12.90 monthly Gas Plant Acquisition Adjustment (GPAA) includes the transaction cost and regulatory cost components. If not, state why.

RESPONSE

The estimated $12.90 monthly GPAA amount referenced on pages 14-15 of the Application does not include the transaction cost and regulatory cost components and does not include a return component.

The $12.90 estimate was intended to reflect the approximate monthly customer impact of amortizing the acquisition premium over a 10-year period. The acquisition premium was calculated as the $800,000 purchase price, less the $72,323.14 net book value of Valley Gas's utility plant-in-service.

The transaction cost and regulatory process cost components were not included in the $12.90 estimate because those amounts were preliminary estimates at the time of filing and are subject to update at closing and/or through the Commission's approval process. OVG will update the GPAA calculation to reflect the components approved by the Commission.

Witness: Steven P. James

DATA REQUEST

PSC 1_19

Identify all components that comprise the GPAA.

RESPONSE

The proposed GPAA consists of the following components:

Component	Amount
Purchase price	$800,000.00
Less: Valley Gas net utility plant-in-service	$(72,323.14)
Acquisition premium	$727,676.86
Transaction costs	$93,275.50
Regulatory process costs	$50,000.00
Total proposed GPAA	**$870,952.36**

The transaction cost and regulatory process cost components are estimates and will be updated, as necessary, based on actual costs incurred and the final amounts approved by the Commission.

The proposed GPAA does not include future capital improvements or ongoing operating costs of the Valley Gas system.

Witness: Steven P. James

DATA REQUEST

PSC 1_20

Refer to the Application, pages 11 and 16. Provide a detailed explanation regarding why the Application requests recovering the GPAA at Valley Gas's weighted average cost of capital instead of Ohio Valley Gas's weighted average cost of capital.

RESPONSE

The Application requested recovery of the GPAA at Valley Gas's weighted average cost of capital because the GPAA is specific to the acquisition of the Valley Gas system and is proposed to be recovered only from Valley Gas customers through Kentucky rates.

This treatment was intended to align the return on the acquisition adjustment with the utility assets, customers, and jurisdiction to which the adjustment relates. The GPAA consists of the acquisition premium, transaction costs, and regulatory process costs incurred in connection with the acquisition of the Valley Gas system.

OVG remains in a stronger financial position than Valley Gas to acquire, operate, and improve the system over time. The proposed use of Valley Gas's WACC for GPAA recovery was intended only to align the return with the Valley Gas assets and customers, not to suggest that Valley Gas has better access to capital than OVG.

OVG recognizes that the Commission will determine the appropriate recovery mechanism and return based on the record in this proceeding.

Witness: John T. Stenger

DATA REQUEST

PSC 1_21

Refer to Case No. 2025-003892 and Case No. 2026-001493 . Explain the impact of these two open purchase gas adjustment cases on this transaction, if any.

RESPONSE

OVG does not expect Case No. 2025-00389 or Case No. 2026-00149 to affect its request for approval to acquire the Valley Gas system or its request for approval of the GPAA. Those proceedings relate to Valley Gas's purchased gas adjustment rates and gas cost recovery, rather than the purchase price, valuation of the utility assets, or the acquisition adjustment.

To the extent Case No. 2025-00389 results in any refund, credit, reserve, or other adjustment related to pre-closing gas costs, the Asset Purchase Agreement includes a Gas Cost Reserve Amount intended to address that matter. OVG and Valley Gas will comply with any Commission orders issued in that proceeding.

Case No. 2026-00149 concerns Valley Gas's purchased gas adjustment rates. Following closing, OVG will administer the purchased gas adjustment for the Valley Gas service territory in accordance with Commission requirements and will reflect Commission-approved gas cost rates and adjustments in customer bills as applicable.

OVG will supplement this response if a final Commission order in either proceeding creates a material impact on the transaction.

Witness: John T. Stenger

DATA REQUEST

PSC 1_22

Explain if, and when, Ohio Valley Gas intends to obtain a Kentucky federal safety identification number. If Ohio Valley Gas has obtained the number already, provide all federal safety identifiers for Kentucky.

RESPONSE

OVG intends to operate vehicles under its current US DOT identification number, which is US DOT 216674. OVG does not operate any vehicles that will meet or exceed the 60,000 lb. threshold for the Kentucky Highway Use License.

Witness: Gregory A. Bailey

DATA REQUEST

PSC 1_23

Refer to the Application, page 13.

a. Explain how the inputs were determined for the Replacement Cost New Less Depreciation. Provide any supporting workpapers in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible and unprotected.

b. Explain the conclusion that "per customer cost of installing new service would be greater than either value." Include any supporting workpapers in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible and unprotected.

RESPONSE

OVG relied on the Banning Engineering valuation and appraisal to support the Replacement Cost New Less Depreciation ("RCNLD") analysis referenced in the Application.

The RCNLD inputs were determined by Banning Engineering based on information provided by OVG and Valley Gas, GIS and Google Earth files, a site visit conducted on October 31, 2024, available maps, records, invoices, system information, and engineering judgment. The appraisal identified the primary system assets, including gas mains, service lines, meters, valves, regulator stations, and odorization equipment, and applied estimated replacement costs, useful lives, and remaining life assumptions.

The Banning Engineering valuation calculated a total depreciated replacement cost value of $1,029,096, rounded to $1,030,000. This equates to approximately $2,191 per customer using the approximate customer count referenced in the Application. The negotiated purchase price of $800,000 equates to approximately $1,702 per customer using the same approximate customer count.

The conclusion that the cost of installing new service would be greater than either value is supported by the replacement cost new of the existing facilities before depreciation, which is substantially higher than both the depreciated valuation and the purchase price.

The Banning Engineering appraisal is provided as OVG_R_PSCDR1_3_Attachment1. Supporting calculations are provided in OVG_R_PSCDR1_23_Attachment1.

Witness: John T. Stenger

DATA REQUEST

PSC 1_24

Provide a workpaper itemizing the approximately $93,275.50 in transaction costs by cost element, vendor, and amount, distinguishing costs already incurred from costs estimated, with supporting invoices or engagement letters. Provide all calculations in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

a. Confirm that no Seller obligation, including any Cetane Associates commission or fee, is included.

b. State whether any OVG internal labor or allocated overhead is included and how it was priced.

RESPONSE

The requested transaction cost detail is provided in OVG_R_PSCDR1_24_Attachment1. The attachment itemizes the transaction costs by cost element, vendor, amount, and whether the amount has been incurred or estimated. Supporting invoices, engagement letters, or other available documentation are also provided in OVG_R_PSCDR1_24_Attachment2.

OVG has also identified an additional $3,845.00 invoice from Greater Heights Services for diligence work performed on OVG's behalf. That amount was not included in the $93,275.50 transaction cost approximation originally referenced in the Application. The total transaction amount has been updated to $97,119.50, as shown in OVG_R_PSCDR1_24_Attachment1.

OVG confirms that the transaction cost amount does not include any Seller obligation, including any Cetane Associates commission, broker fee, or other seller-side transaction cost.

OVG further confirms that the transaction cost amount does not include OVG internal labor or allocated overhead. The amount consists of external transaction-related costs incurred or expected to be incurred by OVG in connection with the acquisition.

The transaction cost amount remains subject to update based on actual costs incurred through closing and the Commission's review and approval.

Witness: Steven P. James

STOLL · KEENON · OGDEN
PLLC
300 West Vine Street
Suite 2100
Lexington, Kentucky 40507-1801
(859) 231-3000
Tax Id # 61-0421389
September 11, 2024

Ohio Valley Gas Corporation
greg.roach@ovgas.com

INVOICE NO.: 1054459
SKO File No.: 520123/183485

PAYMENT REMITTANCE

Payments via regular mail:	STOLL · KEENON · OGDEN PLLC P.O. Box 11969 Lexington, Kentucky 40579-1969
Payments via ACH or EFT:	Stoll Keenon Ogden PLLC IOLTA Account Fifth Third Bank, Cincinnati OH ABA/Bank Routing Number: 042101190 Account Number: 7381347322 Please reference your account and invoice numbers. Email remittance to payments@skofirm.com

Re: Transfer of Control Proceeding at Public Service Commission

Our Reference: 520123/183485/LWI/2402
Fees rendered this bill $ 2,063.00

Total Current Charges This Matter **$ 2,063.00**

1000 123-101 $2063.00

RECEIVED
SEP 11 2024
BY:

V. 2114

*PLEASE INDICATE INVOICE NUMBER 1054459 ON PAYMENT

STOLL · KEENON · OGDEN
PLLC
300 West Vine Street
Suite 2100
Lexington, Kentucky 40507-1801
(859) 231-3000
Tax Id # 61-0421389
September 11, 2024

Ohio Valley Gas Corporation
greg.roach@ovgas.com

INVOICE NO.: 1054459
SKO File No.: 520123/183485

MATTER NAME: Transfer of Control Proceeding at Public Service Commission

TOTAL FEES FOR PROFESSIONAL SERVICES PER ATTACHED	2,063.00
TOTAL CHARGES FOR EXPENSES AND OTHER SERVICES PER ATTACHED	0.00
INVOICE TOTAL	$ 2,063.00
TOTAL BALANCE DUE	**$2,063.00**

*PLEASE INDICATE INVOICE NUMBER 1054459 ON PAYMENT

BILL DATE: September 11, 2024

Ohio Valley Gas Corporation
greg.roach@ovgas.com
,

Transfer of Control Proceeding at PSC

LEGAL FEES

DATE	IND	DESCRIPTION OF SERVICE	HOURS	RATE	AMOUNT
08/05/24	MLB	Discuss CPCN proceeding with L. Ingram	0.20	415.00	$ 83.00
08/05/24	LWI	Confer M. Braun re strategy; review statutes and case law to prepare for meeting with client	1.80	495.00	891.00
08/06/24	LWI	Prepare for and attend call with client; review slides and authority for same	2.20	495.00	1,089.00
		SUBTOTAL	**4.20**		**$2,063.00**

EXPENSES AND OTHER SERVICES

DATE	DESCRIPTION	AMOUNT
	SUBTOTAL	**0.00**
	GRAND TOTAL:	**$2,063.00**

ATTORNEY/PARALEGAL SUMMARY

TIMEKEEPER	RANK	HOURS	RATE	AMOUNT
M. Braun	Member	0.20	415.00	$83.00
L. W Ingram, III	Member	4.00	495.00	$1,980.00

James T. Snapp
Accounting/Administrative
859-231-3996 Direct
859-231-3000 Receptionist
300 West Vine Street, Ste. 2100
Lexington KY 40507-1801

James Snapp

James.Snapp@skofirm.com
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Stoll Keenon Ogden PLLC
300 W. Vine St., Suite 2100
Lexington, KY 40507

Louisville | Lexington | Indianapolis | Evansville | Frankfort | www.skofirm.com
Stoll Keenon Ogden PLLC is Mansfield Certified.

BANNING ENGINEERING

Banning Engineering, INC. • 853 Columbia Road, Suite 101 • Plainfield, IN 46168
Phone: (317) 707-3700 • Fax: (317) 707-3800 • E-mail: Banning@BanningEngineering.com

November 5, 2024
Project No: 24213
Invoice No: 2411006

Mr. Greg Roach
Ohio Valley Gas Corporation
111 Energy Park Drive
Winchester, IN 47394

Invoice Total	$9,400.00

Project 24213 Valley Gas Company Appraisal

Professional Services through October 31, 2024

Phase 0628 Appraisal of Valley Gas

Fee

Total Fee	20,000.00			
Percent Complete	80.00	Total Earned	16,000.00	
		Previous Fee Billing	6,600.00	
		Current Fee Billing	9,400.00	
		Total Fee		**9,400.00**

Total this Phase **$9,400.00**

TOTAL THIS INVOICE **$9,400.00**

RECEIVED
NOV 22 2024
BY:

1000 123-101 $9,400.00

V. 3205

BANNING ENGINEERING
Banning Engineering, INC. • 853 Columbia Road, Suite 101 • Plainfield, IN 46168
Phone: (317) 707-3700 • Fax: (317) 707-3800 • E-mail: Banning@BanningEngineering.com

December 11, 2024
Project No: 24213
Invoice No: 2412066

Mr. Greg Roach
Ohio Valley Gas Corporation
111 Energy Park Drive
Winchester, IN 47394

Invoice Total $4,000.00

Project 24213 Valley Gas Company Appraisal

Professional Services through November 30, 2024

Phase 0628 Appraisal of Valley Gas

Fee

Total Fee	20,000.00			
Percent Complete	100.00	Total Earned	20,000.00	
		Previous Fee Billing	16,000.00	
		Current Fee Billing	4,000.00	
		Total Fee		**4,000.00**
			Total this Phase	**$4,000.00**
			TOTAL THIS INVOICE	**$4,000.00**

1000-123-101

jdw 12-19-24

RECEIVED
DEC 18 2024
BY:

BANNING ENGINEERING
Banning Engineering, INC. • 853 Columbia Road, Suite 101 • Plainfield, IN 46168
Phone: (317) 707-3700 • Fax: (317) 707-3800 • E-mail: Banning@BanningEngineering.com

October 11, 2024
Project No: 24213
Invoice No: 2410161

Mr. Greg Roach
Ohio Valley Gas Corporation
111 Energy Park Drive
Winchester, IN 47394

Invoice Total $6,600.00

Project 24213 Valley Gas Company Appraisal

Professional Services through September 30, 2024

Phase 0628 Appraisal of Valley Gas

Fee

Total Fee	20,000.00			
Percent Complete	33.00	Total Earned	6,600.00	
		Previous Fee Billing	0.00	
		Current Fee Billing	6,600.00	
		Total Fee		**6,600.00**
		Total this Phase		**$6,600.00**
		TOTAL THIS INVOICE		**$6,600.00**

RECEIVED
OCT 14 2024
BY:

1000 123-101

V. 3205

Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

October 15, 2025
Invoice #: 6875005

Ohio Valley Gas Corporation
John T. Stenger, P.E.
Vice President of Operations
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

INVOICE SUMMARY

Client/File No. OVG02/GN017 KPAS

For professional services rendered and costs advanced through September 30, 2025:

RE: Acquisition of Valley Gas
P 94932952001 Indiana Dept Of Envi v
Ohio Valley Case Corp
5609901

Professional Services	7,901.50
Costs Advanced	.00
TOTAL THIS INVOICE	**7,901.50**
Previous Balance	1,357.00
TOTAL BALANCE DUE	**9,258.50**

DUE UPON RECEIPT

Client/File #: OVG02/GN017 Invoice #: 6875005

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Rate	Amount
9/03/25	HDA	Work on draft purchase agreement; review deal documents in relation to the foregoing.	4.50	685.00	3,082.50
9/04/25	HDA	Further revisions to draft purchase agreement; send same to John Stenger and Scott Williams for review/comment.	4.30	685.00	2,945.50
9/22/25	MRAL	Emails with J. Stenger regarding status.	.30	585.00	175.50
9/22/25	HDA	Confer with John Stenger and Mark Alson regarding status updates on Valley Gas asset acquisition; review changes to draft agreement.	.30	685.00	205.50
9/25/25	MRAL	Coordination of issues related to acquisition matters.	.20	585.00	117.00
9/25/25	BDLE	Review of CIM and transaction background information from H. Alderfer;	.80	435.00	348.00
9/25/25	HDA	Preliminary review of revised APA draft; confer with OVG team and Brendan LeMay regarding the same.	.80	685.00	548.00
9/26/25	HDA	Preliminary review of APA material issues list; email correspondence with Brendan LeMay regarding the same.	.40	685.00	274.00
9/29/25	HDA	Further review of APA markup and issues list.	.30	685.00	205.50

TOTAL PROFESSIONAL SERVICES	**7,901.50**
TOTAL THIS INVOICE	**7,901.50**
PREVIOUS BALANCE	1,357.00
TOTAL DUE	**9,258.50**

Taft Stettinius & Hollister LLP
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FEIN#: 31-0541755

October 15, 2025
Invoice # 6875005

Ohio Valley Gas Corporation
Vice President of Operations
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

REMITTANCE ADVICE

Client/File #: OVG02/GN017 KPAS

RE: Acquisition of Valley Gas

TOTAL THIS INVOICE	**7,901.50**
Previous Balance	1,357.00
TOTAL	**9,258.50**

DUE UPON RECEIPT

Please return this advice with payment to:

Taft Stettinius & Hollister LLP
ATTN: Accounts Receivable
P.O. Box 8940
Carol Stream, IL 60197-8940

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ABA# 071925444
Account # 6350024966
Taft Stettinius & Hollister LLP
Send Notices to ACHPayment@taftlaw.com

To Pay by Credit Card/eCheck:

Please visit the Firm's website
Taftlaw.com/payments/
to submit your payment

Or contact your local Taft office
at the number listed above.

Please reference Client/File #: OVG02/GN017, Invoice #: 6875005 with payment.

1061 123-101

APPROVED FOR PAYMENT

John T. Stenger

12-1-2025

Invoice

VerDouw Regulatory Services, LLC
1268 Emerald Gardens Drive
Saint Peters, MO 63376-4305

Billed Party:

Ohio Valley Gas Corporation
Attention: John Stenger, Vice President of Operations
111 Energy Park Drive, P. O. Box 469
Winchester, IN 47394
Telephone: (765) 595-8049
Invoice sent via email to John.Stenger@ovgas.com

Invoice Number: OVG-36 ***Invoice Date:*** 12/1/2025

Project: Ohio Valley Gas Corporation
Regulatory Items

Services Description	***From***	***To***	***Amount***	***Rate***	***Item Total***
Consulting Hours:	11/1/2025	11/30/2025	3.25	$ 250.00	$ 812.50
Copies Made:	11/1/2025	11/30/2025	6	$ 0.25	$ 1.50
Travel Time:	N/A	N/A	0.00	$ 75.00	$ -
Travel Miles:	N/A	N/A	0.00	$ 0.700	$ -
Other Billed Items:	11/1/2025	11/30/2025	-	N/A	$ -
Other Billed Items:	11/1/2025	11/30/2025	-	N/A	$ -
Invoice Total:					**$ 814.00**

Billing for:
Discussions and emails with John Stenger and with Linda Bridwell of KY PSC re acquisition process.

Payment Terms: Net 30. Late Payment Fee of 3% due if invoice is not paid within 30 days.

Remit Payment To: VerDouw Regulatory Services, LLC
Gary VerDouw, CEO
1268 Emerald Gardens Drive
Saint Peters, MO 63376-4305

IRS EIN: 85-4277278

Contact Information:

Gary VerDouw
Cell Number: (314) 707-6154
Email: gary@verdouwregservices.com
www.verdouwregservices.com

Please contact Gary VerDouw at gary@verdouwregservices.com if interested in paying invoice via ACH.

Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

December 5, 2025
Invoice #: 6925417

Ohio Valley Gas Corporation
John T. Stenger, P.E.
Chief Operating Officer
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

INVOICE SUMMARY

Client/File No. OVG02/GN017 KPAS

For professional services rendered and costs advanced through November 30, 2025:

RE: Acquisition of Valley Gas
Ohio Valley Case Corp
5609901

Professional Services	6,263.50
Costs Advanced	.00
TOTAL THIS INVOICE	**6,263.50**
Previous Balance	13,458.00
TOTAL BALANCE DUE	**19,721.50**

DUE UPON RECEIPT

Client/File #: OVG02/GN017 Invoice #: 6925417

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Rate	Amount
11/03/25	MRAL	Contact to Kentucky PSC counsel regarding statutory process related to acquisition premium; email to client.	.40	525.00	210.00
11/03/25	HDA	Telephone conference with Mark Alson regarding transaction status updates.	.10	685.00	68.50
11/05/25	MRAL	Email to M. Tussey regarding acquisition premium process matters; review of client email.	.40	525.00	210.00
11/07/25	MRAL	Prepare for and call with M. Tussey regarding acquisition premium matters; emails with client.	1.30	525.00	682.50
11/07/25	HDA	Email correspondence with John Stenger and Scott Williams regarding transaction structuring considerations for s-corporation target.	.20	685.00	137.00
11/10/25	MRAL	Email with client regarding Delta test for acquisition premium; call with client team regarding KY PSC process and next steps.	1.20	525.00	630.00
11/10/25	HDA	Videoconference with John Stenger, Scott Williams, Kay Pashos and Mark Alson regarding miscellaneous transaction updates.	.40	685.00	274.00
11/11/25	KPAS	Brief research on Kentucky public utility statutes regarding any requirements that utility be incorporated in state, etc.	.50	550.00	275.00
11/14/25	HDA	Email correspondence with John Stenger regarding issues list discussion call.	.10	685.00	68.50
11/17/25	HDA	Confer with John Stenger regarding APA issues list discussion.	.10	685.00	68.50
11/19/25	MRAL	Emails with client regarding call.	.10	525.00	52.50
11/19/25	HDA	Teleconference with John Stenger and Scott Williams regarding APA issues list discussion and response strategy.	.80	685.00	548.00
11/20/25	HDA	Preliminary review of OVG advisor comments on issues list; email correspondence with John Stenger regarding the same.	.20	685.00	137.00
11/24/25	MRAL	Call with client team regarding updates on APA negotiations and upcoming regulatory case in Kentucky.	.40	525.00	210.00
11/25/25	MRAL	Email to H. Alderfer regarding condition precedent in APA.	.30	525.00	157.50
11/25/25	HDA	Revise draft APA per feedback from OVG team; send same to Tony Marts and Patrick Costello for review/comment; confer with Mark Alson regarding regulatory approval condition in draft APA.	3.70	685.00	2,534.50

TOTAL PROFESSIONAL SERVICES	**6,263.50**
TOTAL THIS INVOICE	**6,263.50**
PREVIOUS BALANCE	13,458.00
TOTAL DUE	**19,721.50**

Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

December 5, 2025
Invoice # 6925417

Ohio Valley Gas Corporation
Chief Operating Officer
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

REMITTANCE ADVICE

Client/File #: OVG02/GN017 KPAS

RE: Acquisition of Valley Gas

TOTAL THIS INVOICE	**6,263.50**
Previous Balance	13,458.00
TOTAL	**19,721.50**

DUE UPON RECEIPT

Please return this advice with payment to:

Taft Stettinius & Hollister LLP
ATTN: Accounts Receivable
P.O. Box 8940
Carol Stream, IL 60197-8940

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Chicago, IL
Swift Code NSCTUS44
ABA# 071925444
Account # 6350024966
Taft Stettinius & Hollister LLP
Send Notices to ACHPayment@taftlaw.com

To Pay by Credit Card/eCheck:

Please visit the Firm's website
Taftlaw.com/payments/
to submit your payment

Or contact your local Taft office
at the number listed above.

Please reference Client/File #: OVG02/GN017, Invoice #: 6925417 with payment.

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One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

November 12, 2025
Invoice #: 6893782

Ohio Valley Gas Corporation
John T. Stenger, P.E.
Chief Operating Officer
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

INVOICE SUMMARY

Client/File No. OVG02/GN017 KPAS

For professional services rendered and costs advanced through October 31, 2025:

RE: Acquisition of Valley Gas
Ohio Valley Case Corp
5609901

Professional Services	13,458.00
Costs Advanced	.00
TOTAL THIS INVOICE	**13,458.00**

DUE UPON RECEIPT

Client/File #: OVG02/GN017 Invoice #: 6893782

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Rate	Amount
10/01/25	BDLE	Review of Seller's draft APA; Drafting issues list based on APA markup from Seller counsel; Correspondence with H. Alderfer regarding same;	5.70	345.00	1,966.50
10/01/25	HDA	Email correspondence with Scott Williams regarding LOI.	.10	685.00	68.50
10/06/25	BDLE	Review of H. Alderfer APA material issues list; Correspondence regarding same;	1.00	345.00	345.00
10/06/25	HDA	Review APA markup and revise draft issues list; confer with OVG team and Brendan LeMay regarding the same.	3.00	685.00	2,055.00
10/07/25	BDLE	Review of and markup to Seller's draft APA	4.60	345.00	1,587.00
10/08/25	BDLE	Review of and markup to Seller's draft APA;	.80	345.00	276.00
10/09/25	BDLE	Review of and markup to Seller's draft APA;	4.40	345.00	1,518.00
10/13/25	BDLE	Correspondence with H. Alderfer regarding Taft comments and markup to draft APA;	.20	345.00	69.00
10/13/25	HDA	Email correspondence with Brendan LeMay regarding status of OVG issues list.	.10	685.00	68.50
10/14/25	MRAL	Call with J. Stenger; reviewing Kentucky PSC cases; prep for tomorrow's call.	1.70	525.00	892.50
10/15/25	MRAL	Call with client, counterparty, and counterparty counsel regarding Kentucky PSC process and related negotiations; follow up research and email to client team on statutory timeline issues.	2.00	525.00	1,050.00
10/16/25	MRAL	Internal emails regarding APA negotiations.	.30	525.00	157.50
10/16/25	HDA	Email correspondence with Mark Alson regarding status of OVG APA negotiations.	.10	685.00	68.50
10/17/25	MRAL	Emails with Pashos and assisting with research on acquisition adjustment.	.60	525.00	315.00
10/20/25	KPAS	Brief research regarding Kentucky utility acquisition statute and timing.	.50	550.00	275.00
10/21/25	HDA	Email correspondence with Scott Williams and John Stenger regarding APA issues list discussion.	.10	685.00	68.50
10/22/25	MRAL	Additional statutory research addressing acquisition premium approval by Kentucky PSC and its impact on utility transfer requests; emails with Pashos.	2.20	525.00	1,155.00
10/23/25	MRAL	Review of example case from Pashos regarding acquisition premium; email to client summarizing research findings.	1.80	525.00	945.00
10/24/25	MRAL	Emails with Stenger regarding Kentucky regulatory timing issues.	.30	525.00	157.50
10/27/25	MRAL	Call with Williams and Stenger; call to Kentucky PSC counsel; email to seller's counsel.	.80	525.00	420.00

TOTAL PROFESSIONAL SERVICES **13,458.00**

TOTAL THIS INVOICE **13,458.00**

Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

November 12, 2025
Invoice # 6893782

Ohio Valley Gas Corporation
Chief Operating Officer
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

REMITTANCE ADVICE

Client/File #: OVG02/GN017 KPAS

RE: Acquisition of Valley Gas

TOTAL THIS INVOICE	**13,458.00**

DUE UPON RECEIPT

Please return this advice with payment to:

Taft Stettinius & Hollister LLP
ATTN: Accounts Receivable
P.O. Box 8940
Carol Stream, IL 60197-8940

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Wintrust Bank, N.A.
Chicago, IL
Swift Code NSCTUS44
ABA# 071925444
Account # 6350024966
Taft Stettinius & Hollister LLP
Send Notices to ACHPayment@taftlaw.com

To Pay by Credit Card/eCheck:

Please visit the Firm's website
Taftlaw.com/payments/
to submit your payment

Or contact your local Taft office
at the number listed above.

Please reference Client/File #: OVG02/GN017, Invoice #: 6893782 with payment.

Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

February 15, 2026
Invoice #: 6996223

Ohio Valley Gas Corporation
John T. Stenger, P.E.
Chief Operating Officer
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

INVOICE SUMMARY

Client/File No. OVG02/GN017 KPAS

For professional services rendered and costs advanced through January 31, 2026:

RE: Acquisition of Valley Gas
Ohio Valley Case Corp
5609901

Professional Services	13,507.50
Costs Advanced	.00
TOTAL THIS INVOICE	**13,507.50**

DUE UPON RECEIPT

Client/File #: OVG02/GN017 Invoice #: 6996223

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Rate	Amount
12/09/25	RKAP	Meeting with partners K. Pashos and M. Alson regarding status of Kentucky regulatory needs post-acquisition	.20	345.00	69.00
12/11/25	RKAP	Calendar critical dates for Kentucky regulatory approval matter; review procedural schedule	.20	345.00	69.00
1/02/26	MRAL	Emails with client regarding Valley Gas acquisition update.	.20	525.00	105.00
1/02/26	HDA	Preliminary review of APA markup; confer with John Stenger regarding the same.	.40	745.00	298.00
1/05/26	KPAS	Teams meeting regarding OVG/VG asset purchase agreement.	.90	550.00	495.00
1/05/26	NJHA	Review transaction materials and comment on Kentucky state and local tax issues; Exchange emails with Taft team regarding follow-up questions.	1.20	905.00	1,086.00
1/05/26	HDA	Review APA markup and prepare issues list respecting same; email correspondence with OVG team regarding the foregoing; confer with Nathan Hagerman regarding transfer tax exposure.	3.20	745.00	2,384.00
1/05/26	RKAP	Meeting with M. Alson regarding Valley Gas acquisition regulatory pleading needs	.20	345.00	69.00
1/06/26	MRAL	Prepare for and participate in call with client team on APA; internal emails and coordination of regulatory filings.	1.50	525.00	787.50
1/06/26	HDA	Videoconference with Scott Williams, John Stenger, Mark Alson and Kay Pashos regarding APA issues list and other deal matters.	.90	745.00	670.50
1/06/26	RKAP	Review Valley Gas acquisition correspondence and documents to understand regulatory issues	.40	345.00	138.00
1/06/26	RKAP	Review pleading requirements for Kentucky Public Service Commission acquisition petitions	.50	345.00	172.50
1/06/26	RKAP	Create template of acquisition pleading documents	.40	345.00	138.00
1/06/26	RKAP	Meeting with M. Alson regarding Valley Gas acquisition regulatory needs	.20	345.00	69.00
1/07/26	MRAL	Assisting with analysis of regulatory strategy.	.30	525.00	157.50
1/07/26	RKAP	Coordinate preparation of pleading drafts for Valley Gas acquisition	.90	345.00	310.50
1/15/26	RKAP	Meeting with M. Alson regarding researching potential business registration needs for upcoming acquisition regulatory filing	.20	345.00	69.00
1/16/26	RKAP	Research business registration needs for complete regulatory filing in acquisition matter	1.60	345.00	552.00
1/16/26	RKAP	Research client history regarding registration as foreign entity	.20	345.00	69.00
1/16/26	RKAP	Review Kentucky Public Service Commission filing requirements for acquisition matters and pleading requirements generally; review KPSC electronic filing requirements	.70	345.00	241.50
1/16/26	RKAP	Exchange emails with internal business team regarding potential client foreign business registration needs	.60	345.00	207.00
1/16/26	RKAP	Review Kentucky Public Service Commission administrative procedures relevant to acquisition matters; exchange emails with M. Alson regarding findings	.50	345.00	172.50
1/16/26	RKAP	Meeting with M. Alson regarding status of research into Kentucky business registration needs	.10	345.00	34.50
1/20/26	HDA	Email correspondence with John Stenger regarding APA updates.	.20	745.00	149.00
1/20/26	RKAP	Research Kentucky pleading requirements for filing of acquisition approval petition	.20	345.00	69.00

Client/File #: OVG02/GN017

Invoice #: 6996223

Date	Atty	Description Of Services Rendered	Hours	Rate	Amount
1/22/26	MRAL	Email to client regarding authorization to do business in Kentucky.	.30	525.00	157.50
1/25/26	HDA	Email correspondence with Tony Marts regarding APA markup.	.10	745.00	74.50
1/26/26	HDA	Work on revisions to draft APA.	2.30	745.00	1,713.50
1/27/26	HDA	Review and revise draft APA per comments from OVG team.	1.80	745.00	1,341.00
1/30/26	HDA	Further revisions to draft APA per comments from OVG team; send updated draft to Tony Marts for review/comment.	2.20	745.00	1,639.00

TOTAL PROFESSIONAL SERVICES **13,507.50**

TOTAL THIS INVOICE **13,507.50**

Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

February 15, 2026
Invoice # 6996223

Ohio Valley Gas Corporation
Chief Operating Officer
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

REMITTANCE ADVICE

Client/File #: OVG02/GN017 KPAS

RE: Acquisition of Valley Gas

TOTAL THIS INVOICE	**13,507.50**

DUE UPON RECEIPT

Please return this advice with payment to:

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Carol Stream, IL 60197-8940

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to submit your payment

Or contact your local Taft office
at the number listed above.

Please reference Client/File #: OVG02/GN017, Invoice #: 6996223 with payment.

Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

April 14, 2026
Invoice #: 7061023

Ohio Valley Gas Corporation
John T. Stenger, P.E.
Chief Operating Officer
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

INVOICE SUMMARY

Client/File No. OVG02/GN017 KPAS

For professional services rendered and costs advanced through March 31, 2026:

RE: Acquisition of Valley Gas
Ohio Valley Case Corp
5609901

Professional Services	8,430.50
Costs Advanced	.00
TOTAL THIS INVOICE	**8,430.50**
Previous Balance	19,479.50
TOTAL BALANCE DUE	**27,910.00**

DUE UPON RECEIPT

Client/File #: OVG02/GN017 Invoice #: 7061023

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Rate	Amount
3/02/26	HDA	Review Valley Gas data room.	.30	745.00	223.50
3/10/26	HDA	Email correspondence with Kay Pashos regarding status of draft disclosure schedules.	.10	745.00	74.50
3/13/26	HDA	Calls/emails with OVG team regarding Valley Gas acquisition.	.20	745.00	149.00
3/16/26	MRAL	Internal collaboration regarding transaction negotiation update, including impact on regulatory filing preparations.	.30	525.00	157.50
3/16/26	HDA	Calls/emails with OVG team regarding updates to draft purchase agreement; work on revisions to same; draft closing ancillaries/exhibits to APA; review APA disclosure schedules.	3.50	745.00	2,607.50
3/17/26	HDA	Confer with Scott Williams regarding transaction status updates.	.20	745.00	149.00
3/17/26	RKAP	Review update from M. Alson regarding progress of KY acquisition negotiations and regulatory needs	.10	345.00	34.50
3/18/26	HDA	Revise purchase agreement; correspondence with Tony Marts regarding the same.	.50	745.00	372.50
3/19/26	HDA	Email correspondence with Scott Williams regarding holdback release and indemnity protections under APA; review APA in relation to same.	.30	745.00	223.50
3/22/26	HDA	Email correspondence with Scott Williams and John Stenger regarding proposed holdback revisions.	.20	745.00	149.00
3/23/26	HDA	Email correspondence with Scott Williams, John Stenger and Tony Marts regarding APA revisions and mileage disclosure.	.50	745.00	372.50
3/23/26	RKAP	Review list of facts needed from client and target and note relevancy for KY acquisition pleadings	.20	345.00	69.00
3/30/26	KPAS	Meeting between OVG and Taft regarding Valley Gas Kentucky application information needed.	.70	550.00	385.00
3/30/26	MRAL	Prepare for and participate in call with client team regarding regulatory aspects of Kentucky acquisition; internal follow up; research into Delta test factors.	1.90	525.00	997.50
3/30/26	HDA	Email correspondence with Tony Marts and OVG team regarding pipeline mileage disclosures.	.20	745.00	149.00
3/30/26	RKAP	Draft findings regarding appraisals and confidentiality for M. Alson and K. Pashos	1.00	345.00	345.00
3/30/26	RKAP	Research party recovery of transaction and regulatory costs in Kentucky PSC proceedings	.10	345.00	34.50
3/30/26	RKAP	Review current draft of acquisition agreement for provisions applicable to regulatory application	.10	345.00	34.50
3/30/26	RKAP	Research Kentucky PSC confidentiality filing requirements and considerations	.50	345.00	172.50
3/30/26	RKAP	Prepare for and attend meeting regarding factual matters for acquisition application	1.10	345.00	379.50
3/30/26	RKAP	Meeting with M. Alson regarding further research needs for acquisition regulatory filing	.40	345.00	138.00
3/30/26	RKAP	Research party use of, and Commission requests for, appraisals and similar assessment in acquisition adjustment proceedings	2.20	345.00	759.00
3/30/26	RKAP	Follow-up with K. Pashos and M. Alson after meeting regarding research and drafting needs	.30	345.00	103.50
3/31/26	HDA	Confer with John Stenger regarding follow-up diligence questions.	.10	745.00	74.50

Client/File #: OVG02/GN017 Invoice #: 7061023

Date	Atty	Description Of Services Rendered	Hours	Rate	Amount
3/31/26	RKAP	Continue researching party use of, and Commission requests for, appraisals and similar assessments in acquisition adjustment proceedings	.80	345.00	276.00

TOTAL PROFESSIONAL SERVICES	**8,430.50**
TOTAL THIS INVOICE	**8,430.50**
PREVIOUS BALANCE	19,479.50
TOTAL DUE	**27,910.00**

Taft Stettinius & Hollister LLP
One Indiana Square, Suite 3500 / Indianapolis, IN 46204-2023
Tel: 317.713.3500 / Fax: 317.713.3699
www.taftlaw.com
FEIN#: 31-0541755

April 14, 2026
Invoice # 7061023

Ohio Valley Gas Corporation
Chief Operating Officer
111 Energy Park Dr.
P.O. Box 469
Winchester, IN 47394

REMITTANCE ADVICE

Client/File #: OVG02/GN017 KPAS

RE: Acquisition of Valley Gas

TOTAL THIS INVOICE	**8,430.50**
Previous Balance	19,479.50
TOTAL	**27,910.00**

DUE UPON RECEIPT

Please return this advice with payment to:

Taft Stettinius & Hollister LLP
ATTN: Accounts Receivable
P.O. Box 8940
Carol Stream, IL 60197-8940

BEWARE OF CYBER-FRAUD

Below are the correct wire/ACH instructions for Taft Stettinius & Hollister LLP. As a best practice, you should always call your Taft contact at a number you know is valid to verbally confirm wire instructions before initiating any transfer - especially if you receive an email containing different information than shown below.

Wire Transfer Instructions:

Wintrust Bank, N.A.
Chicago, IL
Swift Code NSCTUS44
ABA# 071925444
Account # 6350024966
Taft Stettinius & Hollister LLP
Send Notices to ACHPayment@taftlaw.com

To Pay by Credit Card/eCheck:

Please visit the Firm's website
Taftlaw.com/payments/
to submit your payment

Or contact your local Taft office
at the number listed above.

Please reference Client/File #: OVG02/GN017, Invoice #: 7061023 with payment.

Greater Heights Services Corporation
2331 E 600 N Suite 109
Greenfield, IN 46140

Invoice

Date	Invoice #
2/9/2024	020924CS454

Bill To
111 Energy Park Drive Winchester, IN 47394 Greg Bailey

Item	Description	Quantity	Rate	Crew	Amount
CS-WO-24-081	GO Due Diligence Reduced rate for travel	9	100.00	2- OQ'd	900.00
CS-WO-24-081	GO Due Diligence	15.5	190.00	2- OQ'd	2,945.00

RECEIVED
FEB 23 2024
BY:

1068 107-001 # 3845.00

WO 24-081

Phone #	7655680380	E-mail	scott.ingram@ovgas.com	Total	$3,845.00

4824

OVG FORM NO. 112a

Revised 6/19/2020

WEEKLY PROGRESS REPORT
Hourly Crew

Contractor GHC

Period Covered: From 2-6 To 2-8

Date	Work Chargeable To: (Example: W.O. #15-xx, etc.)	Number of Crew Members	Number of Hours	Footage	Number of Services
2-6	W.O # 24-081	2	4.5	reduce rate	travel
2-7	W.O 24-081	2	9		
2-8	W.O 24-081	2	6.5		
2-8	W.O # 24-081	2	4.5	reduce rate	travel

Names of contractor personnel (Give description, job number and details pertinent to payment for extra personnel and/or equipment)

Extra Personnel and Equipment Used

Brian Bailey
Matt Peden

Signed for
OHIO VALLEY GAS CORP

(Signature)

2-15-2024
(Date)

Signed for
CONTRACTOR

(Signature)

02-15-2024
(Date)

Make Seven (7) Copies: (4) General Office (1) District Office (1) Chief Inspector (1) Contractor

DATA REQUEST

PSC 1_25

Refer to the Application, page 11. Provide a workpaper detailing all items comprising the estimated $50,000 in regulatory process costs. Provide all calculations in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

RESPONSE

As discussed in the response to DR 1-19, the $50,000 in regulatory process costs is an estimation and will be updated, as necessary, based on actual costs incurred and the final amounts approved by the Commission.

Witness: John T. Stenger

DATA REQUEST

PSC 1_26

Refer to the Application, page 13. Provide the Appraisal of Valley Gas assets, including but not limited to, the Banning Engineering valuation and appraisal of Valley Gas, that Ohio Valley Gas relied on to evaluate the purchase price.

RESPONSE

The Banning Engineering appraisal of the Valley Gas assets, provided herewith as OVG_R_PSCDR1_3_Attachment1, was the primary formal appraisal relied upon by Ohio Valley Gas Corporation in validating the purchase price. No other formal third-party appraisal was commissioned or relied upon.

Prior to the Banning Engineering appraisal, Ohio Valley Gas applied experienced management judgment informed by its history of prior utility acquisitions. Specifically, Ohio Valley Gas has acquired other natural gas distribution systems at approximately $3,000 per customer, including the Grandview Municipal system in southern Indiana. Ohio Valley Gas also has direct knowledge of the competitive market for similar utility assets, having participated in the bidding process for the Lapel, Indiana municipal gas distribution system, where bids reached approximately $5,000 per customer. These comparable transactions informed Ohio Valley Gas's assessment that the negotiated purchase price of $800,000, equating to approximately $1,702 per customer, represented a reasonable and defensible fair market value given the age and condition of the Valley Gas system.

Witness: John T. Stenger

DATA REQUEST

PSC 1_27

Provide all system condition assessments, due diligence report, or other review that Ohio Valley Gas relied on during the acquisition process.

RESPONSE

OVG_R_PSCDR1_27_Attachment1 and OVG_R_PSCDR1_27_Attachment2 are reports that were generated by OVG personnel during a site visit to Valley Gas on February 7 and 8, 2024. These reports were part of OVG's due diligence used to gain knowledge of the system.

Witness: Gregory A. Bailey

Irvington Gas Investigation Report

Note ID: 28 Category: Atm. Corrosion
Address: 100 N First St.
Description: Recent Painting of Exposed Piping

Note ID: 29 Category: Atm. Corrosion
Address: 318 W Kentucky St.
Description: Recent painting of exposed piping

Note ID: 30 Category: Atm. Corrosion
Address: 206 Chestnut St.
Description: Recent painting of exposed piping

Note ID: 31 Category: Atm. Corrosion
Address: 216 Kentucky St.
Description: Recent painting of exposed piping

Note ID: 32 Category: Atm. Corrosion
Address: 704 Maple St.
Description: Recent painting of exposed piping

Note ID: 33 Category: Atm. Corrosion
Address: 813 Park Ave.
Description: Recent painting of exposed piping

Note ID: 34 Category: Atm. Corrosion
Address: 812 Park Ave.
Description: Recent painting of exposed piping

Note ID: 35 Category: Atm. Corrosion
Address: 306 Johnson St.
Description: Recent painting of exposed piping

Note ID: 36 Category: Atm. Corrosion
Address: 911 US-60
Description: Recent painting of exposed piping

Note ID: 37 Category: Atm. Corrosion
Address: 310 Ashby St.
Description: Recent painting of exposed piping

Note ID: 38 Category: Atm. Corrosion
Address: 1294 Irvington-
Description: Recent painting of exposed piping

Note ID: 39 Category: Atm. Corrosion
Address: 109 US-60 Lot 2
Description: Recent painting of exposed piping

Note ID: 40 Category: Atm. Corrosion
Address: 407 Woodlawn Dr. Lot 11
Description: Recent painting of exposed piping

Note ID: 41 Category: Atm. Corrosion
Address: 504 Cross Ln
Description: Recent painting of exposed piping

Note ID: 42 Category: Atm. Corrosion
Address: 511 Woodlawn Dr.
Description: Recent painting of exposed piping

Note ID: 43 Category: Atm. Corrosion
Address: 304 Valley Terrace
Description: Recent painting of exposed piping. no evidence of recent painting on site

Note ID: 44 Category: Atm. Corrosion
Address: 112 S 1st. St.
Description: Recent painting of exposed piping

Note ID: 45 Category: Atm. Corrosion
Address: Granny's Caroline and
Description: Recent painting of exposed piping

Note ID: 46 Category: Atm. Corrosion
Address: Bishop Ln. (Sportsmans
Description: Recent painting of exposed piping

Note ID: Category: Atm. Corrosion
Address: purchase station
Description: cracked coating on inlet of odorizer.

Note ID: 4 Category: CP
Address: 414 Valley View Dr.
Description: Recommended to install anode

Note ID: 5 Category: CP
Address: Valley Terrace @ Parkway
Description: Recommended to install anode

Note ID: 6 Category: CP
Address: 208 Valley Terrace
Description: Recommended to install anode

Note ID: 7 Category: CP
Address: Valley St. @ S. Kentucky
Description: Recommended to install anode

Note ID: 8 Category: CP
Address:
Description: TBS CP Reading in 2022 of 0.63 on site reading inlet -1.1 outlet -1.04. pic is on outlet side maybe 10 ft s of fence

Note ID: 9 Category: CP
Address: 401 W Caroline St.
Description: 401 W Caroline St. CP Reading in 2022 0.58 current reading -.1.102 no anode

Note ID: 10 Category: CP
Address: 306 Valley Terrace
Description: 306 Valley Terrace CP Reading in 2022 of 0.58 on site reading -0.92 after breaking bond of anode and leaving for an hour or two reading went to -0.972. immediate read after bonding anode again dropped to-.95

Note ID: 11 Category: CP
Address: S 1st. St. and E Walnut
Description: S 1st. St. and E Walnut St. CP reading in 2022 of 0.62 current reading -1.14

Note ID: 12	Category: CP
Address: 314 1st Ave.	
Description: 314 1st Ave. CP Reading in 2022 of 0.63	

Note ID: 13 Category: CP
Address: 315 N. Walnut
Description: 315 N. Walnut CP Reading in 2022 of 0.98

Note ID: 14	Category: CP
Address: 415 E Hwy 60	
Description: 415 E Hwy 60 CP Reading in 2023 of -.82 current reading onsite of -0.94. pic of anode bonding method. close nipple for tension on hose clamp. after breaking bond and leaving for an hour or two, co reading rose to -0.96	

Note ID: 15 Category: CP
Address: 1112 Irvington -
Description: 1112 Irvington - Bewleyville Rd. CP Reading in 2023 of -.740

Note ID: 16 Category: CP
Address: 205 E Maple St.
Description: 205 E Maple St. CP Reading in 2023 -.750

Note ID: 17 Category: CP
Address: 117 E Walnut St.
Description: 117 E Walnut St.CP Reading in 2023 of -.760

Note ID: 18 Category: CP
Address: 307 E 5th. St.
Description: 307 E 5th. St. CP Reading in 2023 of -.802

Note ID: 20 Category: CP
Address: 240 1st Ave.
Description: 240 1st Ave. CP Reading in 2023 of -,77

Note ID: Category: CP
Address:
Description: -1.138 on site. Irvington rep brought us here to check. not a normal cp point

Note ID: 19 Category: CP
Address: 416 Union St.
Description: 416 Union St CP Reading in 2023 of -.709. took reading next door at 406. -1.13

Note ID: Category: CP
Address: 200 Ashby St.
Description: varying cp reads on site, -1.23 on main, -1.1 on service maybe 8" from tap, -.973 on riser

Note ID: Category: CP
Address: purchase station
Description: pic looking n at termination flange and odorizer. txg flange reading -1.6, IRV flange reading -0.80 odorizer inlet and outlet readings -0.97.

Note ID: Category: CP
Address: across from bewleyville
Description:

Note ID: Category: CP
Address: sim dowell station
Description: -1.057 reading on site inlet riser -0.993 on xtru pipe under ground at station

Note ID: 24	Category: Integrity
Address:	
Description: Casing?	

Note ID: 27	Category: Integrity
Address:	
Description: Investigate quality of work on somewhat new installation. plastic inlet and outlet. only risers are steel. coating disbonded on inlet. meter cap. is 35000 cfh. pipe supports all bowed out. pipe is roughly coated	



Note ID: Category: Integrity
Address: 1175 sr 79
Description: took some odorization readings. 0.7, 0.6 and 0.5

Note ID:	Category: Integrity
Address: Another master meter.	
Description:	

Note ID: 1 Category: Leak
Address: 200 Ashby St.
Description: 200 Ashby St. "No Leak Detected" but wrote up on leak survey. on site no evidence of a leak present using f.i.

Note ID: 2 Category: Leak
Address: 260 College St.
Description: 260 College St. Fixed Leak on Toe Nipple

Note ID: 3 Category: Leak
Address:
Description: Breck EMS Leak on Toe Nipple. 5 ppm found directly across from eastern storage building and about 1 ft. off the road in gravel

Note ID: 22 Category: Mapping
Address:
Description: What does this station feed?

Note ID: 25 Category: Mapping
Address:
Description: Missing main from paper map here. Also, curious how this stub was ran.

Note ID: 26 Category: Mapping
Address:
Description: Missing main

Note ID: Category: Other
Address: Union and 4th
Description: dig site. one pic of 3/4. supposedly old main that is still live.

Note ID:	Category: Other
Address: 2nd and Caroline	
Description: Dig Site	

Note ID:	Category: Other
Address: 2nd and Caroline	
Description: Dig Site. -1.08	

Note ID:	Category: Other
Address: between 406 and 416	
Description:	

Note ID: 21 Category: Regulation
Address:
Description: Master Meter at apartment complex current cp reading -1.15

Note ID: 23 Category: Regulation
Address:
Description: Pressure Changes? Odorization?

Report Totals

Count: 58

Date Exported: 3/8/2024 8:13 AM

Project Fried Chicken
Investigatory Visit
Feb. 7-Feb. 8, 2024

Synopsis

Project Fried Chicken's (PFC) system consists of approximately 12 miles of distribution main, 9 miles of coated steel and 3 miles of plastic, along with 489 services, of which 377 are steel and 112 are plastic. The purchase point is located approximately two miles south/southeast of HWY 60 on Irvington-Bewleyville Road. The purchase site is on property owned by Texas Gas Transmission. HP steel (approximately 150 psig) runs North along Irvington-Bewleyville Road from the purchase site, terminating at the Town Border Station located at the east end of Valley Terrace Dr., just south of HWY 60. There are two stations that are fed from the HP main before the Town Border Station. These are, in order coming north, the Bewleyville Station and the Sim Dowell Station. Both of these reduce pressure from HP to IP and serve very few customers. There are also first cut regulators and HP meter sets with the meters at the road along the HP main. The Town Border Station reduces HP to IP to serve PFC's distribution system. There is one additional regulator station that serves Mago. OVG would most likely call the Mago Station a meter set.

Cathodic Protection

OVG personnel recorded pipe to soil measurements using an MC Miller model DPM potential tester. The results from each test location are shown below. The majority of readings showed adequate cathodic protection. The custody transfer piping at the purchase station does not show adequate cathodic protection, with three other locations that should be monitored due to borderline cathodic protection readings.

Location	USDI Reading	Current Reading VDC
TBS Outlet	-0.63	-1.04
TBS Inlet	-0.63	-1.1
401 W. Caroline St.	-0.58	-1.102
306 Valley Terrace	-0.58	-0.92
S. 1st St. and Walnut St.	-0.62	-1.14
314 1st Avenue	-0.82	-0.94
415 E HWY 60	-0.82	-0.94
1175 N HWY 79	N/A	-1.138
2nd and Caroline St.	N/A	-1.08
4th and Union St.	N/A	-1.076
Purchase Station TXG Flange	N/A	-1.6
Purchase Station VG Flange	N/A	-0.8
Purchase Station Odorizer Inlet/Outlet	N/A	-0.97

Atmospheric Corrosion

Atmospheric corrosion observations were made at 15 locations. The majority of the locations observed were not wrapped to protect the air to soil interface of the riser. No significant atmospheric corrosion was observed. It is to be noted that the majority of risers had paint scraped down to bare metal in an area approximately ¾" by 1". This was either to take a pipe to soil measurement or to attach a drive-in anode to the riser with a hose clamp. All of the stations could stand being sandblasted and painted. Riser wrapping, when there was some, was observed to be cracked, chipped, or to have voids that would tend to hold water.

Location	Atm Corrosion	Riser condition	Notes
TBS	None observed	Unwrapped	No corrosion observed at risers
306 Valley Terrace	Mild	Unwrapped	Paint was lacking
304 Valley Terrace	Mild	Unwrapped	Paint was lacking
1st. And Walnut	None observed	Unwrapped	Painted
401 W. Caroline	Mild	Unwrapped	Paint was lacking
205 N. 1st	Moderate	Unwrapped	Paint was lacking
14259 US 60	Moderate	Unwrapped	Paint flaking and lacking
Housing Authority	Mild	Unwrapped	Paint flaking, but no corrosion
Purchase Station Odorizer	Mild	Cracked coating	No corrosion, but bare steel in contact with the ground
Bewleyville Station	Mild	Unwrapped	Bare spots scraped on inlet riser
Sim Dowell Station Inlet	Mild	Unwrapped	Bare spots scraped on inlet riser
Sim Dowell Station-Outlet	None observed	Wrapped	
Woodlawn Trailer Park	Moderate	Unwrapped	Only one meter set painted. Many disconnected meter sets. Most meter sets had some atmospheric corrosion
415 E Hwy 60	Mild	Unwrapped	Wrap had been cut off to install anode. Bare spot scraped on riser
Mago	None observed	Wrapped	Wrap has pockets in it that will collect water. Meter set is not completely painted. Suppports are bent.

Direct Examination

The OVG/GHC team excavated in seven locations. These locations were chosen after review of USDI documentation that indicated cathodic protection issues or indicated leakage found during leak survey. Items found Include: split X-Tru Cote at the outlet of the TBS and at Sim Dowell Station, “windowed” coating where taps were installed, unknown pipe size, unknown bare steel pipe at one location, unlocatable lines, map inaccuracies, and incomplete maps. In areas where the coating was “windowed”, the cold applied tape was removed, as well as the X-Tru Cote, and a visual inspection was performed. No evidence of surface corrosion was found at any of the locations. The stripped areas were then coated with hot applied tape and buried. Areas that had split coating were inspected by stripping away the split X-Tru Cote and performing a visual inspection. No evidence of surface corrosion was found. The stripped areas were then coated with hot applied tape and buried. One piece of bare steel was discovered on Union Street. This was not indicated on the map, and was unknown to Kevin Kasey. No other areas of bare steel were found. Direct examination of steel pipe did not indicate any Corrosion.

Location	Depth (ft)	Coating Condition	Corrosion Found	Cp Read	WT	Size (in)	Note
TBS Inlet		FBE in good condition		-1.1			
TBS Outlet	3	Coating split (X-Tru)	N	-1.1	0.24	4	
Bewleyville Station	2.75	Coating was windowed. Tap coated with cold applied tape	N	-0.88	0.22	3	
Sim Dowell Station	3.25	Coating had gap at top of pipe.	N	-0.993	0.23	3	
2nd and Caroline	3	X-Tru coating cracked	N	-1.08	0.18	2	Dig site just east of leak identified at Breckinridge EMS. Found 5ppm at edge of asphalt
4th and Union	1	Coating and weld were in good shape	N	-1.076	0.13	3/4	Map error-map showed 2", but we uncovered 3/4". End of main was bare 3/4" steel.
200 Ashby	2	Coating with cold applied tape	N	-1.23 (main), -1.1 (service), -0.973 (riser)			Location was previously written up as a leak. We leak checked the main and service for leakage with FI unit. We found no leaks. There was a small leak on the stop.

Odorization

The system is odorized with a bypass odorizer at the TXG purchase site. Gas is odorized approximately 50 ft. from the custody transfer flange. PFC does not operate a check meter at the site. Odorant "sniff checks" were performed at two locations-the Mago Regulator Station and at 1179 N SR 79, as these were approximately the furthest points from the odorizer. Observed values for odorant concentration were in the 0.6% gas in air range. Documentation provided by Kevin Kasey showed odorant concentrations varying widely, with levels routinely above 0.7%. Some levels approached 1% gas in air, the Federal limit to be compliant with code.

Valves

PFC's system contains three emergency valves.

<u>Conclusion</u>

PFC's system is a mostly steel, 1960's vintage system that is not necessarily unlike some of OVG's systems. Areas of concern are: split coating, lack of construction records, lack of pressure test data to establish MAOP's, inadequate emergency valving, lack of atmospheric corrosion protection, craftsmanship, incomplete maps, incorrect maps, and the fact that overpressure protection and pressure regulation are controlled by TXG at the purchase site and not controlled by PFC.

DATA REQUEST

PSC 1_28

Refer to the Application, pages 14–15. Provide all known, or expected, improvements Ohio Valley Gas has identified for the Valley Gas system. For each item, provide the estimated capital expenditure required. Include the expected date of completion for each item and how Ohio Valley Gas intends to recover the costs from ratepayers.

RESPONSE

The expected improvements that Ohio Valley Gas has identified for Valley Gas are OVG owned pressure regulation and overpressure protection at the Texas Gas purchase site and the eventual installation of an odorant injector to replace the current bypass odorizer system. Pressure regulation and overpressure protection for the Valley Gas high pressure system is currently controlled by Texas Gas. OVG would develop a project to either acquire the regulation station, or design and install its own station, thus ensuring that OVG personnel are maintaining the regulator station. OVG has not generated cost estimates for these two improvements. However, they were identified during the due diligence site visit and are projects that OVG would eventually seek to implement.

Witness: Gregory A. Bailey

DATA REQUEST

PSC 1_29

State whether Ohio Valley Gas will adopt Valley Gas's existing tariff and rates as they are presently at the consummation of the acquisition. If Ohio Valley Gas intends to change any tariff or rates, state when Ohio Valley Gas intends to file that case with the Commission.

RESPONSE

Upon consummation of the acquisition, OVG intends to provide service to the Valley Gas service territory under Valley Gas's existing Kentucky-approved tariff and rates, as presently on file with the Commission, except to the extent modified by Commission order.

OVG does not intend to apply its Indiana or Ohio tariffs or rates to Valley Gas customers upon closing. Any changes to Valley Gas's Kentucky tariff or rates, including any Commission-approved GPAA recovery or purchased gas adjustment changes, will be made only through the applicable Commission process and in accordance with Commission approval.

Other than the relief requested in this proceeding and any Commission-approved purchased gas adjustment filings, OVG does not currently have a specific date for filing a general tariff or base rate change for the Valley Gas service territory. OVG will evaluate the need for future tariff or rate filings after closing as it gains operating experience with the Valley Gas system.

Witness: John T. Stenger

DATA REQUEST

PSC 1_30

Describe how Ohio Valley Gas will operate the purchased gas adjustment following the acquisition.

RESPONSE

Ohio Valley Gas's Regulatory Team will prepare and file the Purchased Gas Adjustment ("PGA") on a quarterly basis. Each PGA filing will comply with the requirements of Appendix B of the Kentucky Public Service Commission's Gas Cost Adjustment regulations. Ohio Valley Gas's Regulatory Team has significant experience with preparation of PGA filings in Indiana and Ohio and intends to meet with PSC staff prior to its first filing to confirm its understanding of the Kentucky process.

Witness: John T. Stenger

DATA REQUEST

PSC 1_31

Refer to the Application, page 17. State whether Ohio Valley Gas will maintain its Kentucky system's records separately under the Uniform System of Accounts. Include in the response the methodology Ohio Valley Gas intends to use in allocating corporate and shared services costs, including but not limited to, centralized billing, dispatch, emergency response, gas-supply, and regulatory functions between Ohio Valley Gas and the to-be-acquired Valley Gas territory.

RESPONSE

Yes. Following closing, OVG will maintain the Kentucky system's accounting records separately and in accordance with the Uniform System of Accounts prescribed by the Commission.

OVG will establish separate accounting identifiers for the Valley Gas service territory, including separate cost centers, revenue codes, customer billing data, work order/project coding, and regulatory reporting support sufficient to identify Kentucky jurisdictional revenues, expenses, plant additions, depreciation, gas costs, customer deposits, and other utility accounting activity.

OVG's allocation methodology will be based first on direct assignment. Costs that are directly attributable to the Valley Gas service territory will be charged directly to the Kentucky system. This would include items such as Kentucky-specific regulatory filings, Kentucky-specific legal or consulting costs, Valley Gas system capital projects, Valley Gas customer billing activity, Valley Gas purchased gas costs, and direct labor or contractor costs associated with work performed for the Valley Gas system.

For corporate or shared services costs that cannot be directly assigned, OVG will allocate costs using reasonable cost-causative allocation factors. The anticipated allocation approach is summarized below:

Function	Proposed Methodology
Centralized billing and customer service	Direct assignment where identifiable; otherwise allocated based on customer count, billing transactions, or service activity related to the Valley Gas territory.
Dispatch and emergency response	Direct assignment based on calls, service orders, time records, or other activity records where identifiable; otherwise allocated based on reasonable operational activity drivers.
Gas supply	Direct assignment of Valley Gas commodity, transportation, and purchased gas costs where identifiable; shared administrative gas-supply costs allocated based on customer count, throughput, or other appropriate gas-supply activity measures.
Regulatory functions	Direct assignment of Kentucky-specific filings, compliance costs, and outside professional fees; shared internal regulatory support allocated based on time records or other reasonable measures of effort.
Engineering, mapping, and compliance support	Direct assignment to Kentucky projects or compliance activities where identifiable; shared costs allocated based on work orders, project activity, time records, or system activity measures.
General corporate and administrative services	Direct assignment where possible; otherwise allocated using reasonable cost-causative factors such as customer count, labor effort, transactions, or other appropriate drivers.

OVG will maintain supporting documentation for direct charges and allocations and will review the allocation methodology periodically to ensure it remains reasonable as Valley Gas is integrated into OVG's operations. OVG will also provide support for any Kentucky jurisdictional costs in future Commission filings as required.

Witness: Steven P. James

VERIFICATION

STATE OF Indiana)
) ss:
COUNTY OF Randolph)

The undersigned, JOHN T. STENGER, being duly sworn, deposes and says that he is VP & COO of Ohio Valley Gas Corporation, that he has personal knowledge of the matters set forth above, and that the foregoing information is true and correct to the best of his knowledge, information, and belief.

CAREY DAWN ROBINSON-TODD
My Comm. Exp. 07/04/30
Comm. #NP0742172
NOTARY SEAL PUBLIC
Randolph County
STATE OF INDIANA

JOHN T. STENGER
Name (Please Print)

John T. Stenger
Signature

Sworn to before me and subscribed in my presence this 30 day of June, 2026.

Carey Dawn Robinson-Todd
Notary Public

VERIFICATION

STATE OF Indiana)
) ss:
COUNTY OF Randolph)

The undersigned, Steven P. James, being duly sworn, deposes and says that he is VP of Finance of Ohio Valley Gas Corporation, that he has personal knowledge of the matters set forth above, and that the foregoing information is true and correct to the best of his knowledge, information, and belief.

CAREY DAWN ROBINSON-TODD
My Comm. Exp. 07/04/30
Comm. #NP0742172
NOTARY SEAL PUBLIC
Randolph County
STATE OF INDIANA

STEVEN P. JAMES
Name (Please Print)

Signature

Sworn to before me and subscribed in my presence this 30 day of June, 2026.

Carey Dawn Robinson-Todd
Notary Public

VERIFICATION

STATE OF Indiana)
) ss:
COUNTY OF Randolph)

The undersigned, Gregory A. Bailey, being duly sworn, deposes and says that he is VP + Chief Engineer of Ohio Valley Gas Corporation, that he has personal knowledge of the matters set forth above, and that the foregoing information is true and correct to the best of his knowledge, information, and belief.

CAREY DAWN ROBINSON-TODD
My Comm. Exp. 07/04/30
Comm. #NP0742172
NOTARY SEAL PUBLIC
Randolph County
STATE OF INDIANA

Gregory A Bailey
Name (Please Print)

[signature]
Signature

Sworn to before me and subscribed in my presence this 30 day of June, 2026.

Carey Dawn Robinson-Todd
Notary Public

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8 as modified by 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 1, 2026, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

/s/ Rajan Kapoor
Counsel for Ohio Valley Gas Corporation