

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

Columbia Gas of Kentucky, Inc.)

)

Complainant)

)

v.)

)

Natural Energy Utility Corporation)

)

Defendant)

Case No. 2009-00340

**NEUC's First Data Request to
Columbia Gas of Kentucky**

Natural Energy Utility Corporation (NEUC), by counsel, submits the following questions to Columbia Gas of Kentucky:

1. What was Columbia's response to the owners of the properties when service disconnection was requested on July 22, 2009?
2. When you state that NEUC has a distribution main in an unimproved area adjacent to the customers involved in this matter, do you mean that the facilities are actually located on the customers' property. If not, what facts do you have to indicate the NEUC facilities are not located on the customers' property?
3. Provide the bills associated with the meters listed on Attachment 1 to your testimony for 901 13th Street, 915 13th Street and 1200 Bryan Street for the period September, 2009 through the most recent bill.
4. Was the construction observed in July or August, 2009 by NEUC partially on property owned by the customers in question? If not, explain where the construction occurred.

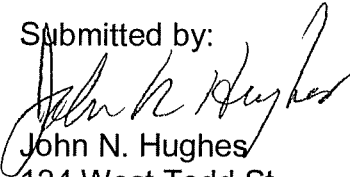
5. Do you have any information to dispute the testimony of Jay Freeman that NEUC has gas pipeline facilities located on the disputed customers' property? If yes, explain.

6. Do you have any information to dispute the testimony of Jay Freeman that NEUC has customers located at each end of the disputed customers' property? If yes, explain.

7. Do you have any information to dispute the accuracy of the maps and plats showing NEUC facilities on the disputed customers' property that were included with NEUC's September 8, 2009 response filed with the PSC? If yes, explain.

8. Does Columbia have any Inspection Report, correspondence or other information from the PSC that indicates a problem with cathodic protection near NEUC facilities in the area near the disputed property? If yes, provide.

Submitted by:

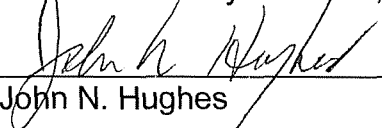


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Certification:

I certify that a copy of this Data Request was served on Steve Seiple, and Brooke Leslie, Box 117, Columbus, OH, 43216-0117 and Richard Taylor, 225 Capital Ave., Frankfort, KY 40601 by first class mail the 15th day of March, 2010.



John N. Hughes