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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
Columbia Gas of Kentucky, Inc.)
)
Complainant)
)
v.)
)
Natural Energy Utility Corporation)
)
Defendant)

Case No. 2009-00340

COLUMBIA GAS OF KENTUCKY, INC.'S
SECOND DATA REQUESTS SERVED UPON
NATURAL ENERGY UTILITY CORPORATION

1. NEUC's response to PSC Data Request 3(a) identifies #432 on map attached as Exhibit 1 to NEUC's Answer as the "Wells" property. In response to CKY's Data Request 2, Mr. Freeman identifies two properties, one being "Alf Large, 2337 Oakview Rd, Ashland KY." Is this property the same property identified as the "Wells" property in response to PSC Data Request 3(a)?
2. In response to CKY Data Request 3, Mr. Freeman identifies Patrick Watson as a customer who requested to relocate an existing gas main in June 2007. In response to PSC Data Request 7, Mr. Freeman asserts that NEUC replaced an existing portion of steel pipeline for Patrick Watson in August 2009. Please explain the delay between Mr. Watson's request in 2007 and the actual work performed in 2009.
3. Please identify by name, location, and date customers who have initiated service with NEUC in the Ashland area in the past 5 years.
4. Have any customers in the past 5 years requested service from NEUC, but NEUC refused service? If yes, identify by date and location and include an explanation as to why service was refused.
5. In response to CKY Data Request 9, Mr. Freeman indicates that NEUC received verbal authorization from the property owner, Mr. Watson to run its facilities on his property. In exchange for authorization, did NEUC offer Mr. Watson a discounted or special rate?

6. Does NEUC run any main lines, service lines or another facility through the property at 1200 Bryan Street? If yes, does NEUC have an easement from the property owner of 1200 Bryan Street? If yes, what is the date of the easement? Please provide a copy of said easement.
7. In response to CKY Data Request 13, Mr. Freeman indicates that it had an existing easement for the steel pipeline across the mall property. When was the easement obtained? Why are there no documents to reflect this easement?

Respectfully submitted,

COLUMBIA GAS OF KENTUCKY, INC.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Columbia Gas of Kentucky, Inc's
Second Data Requests Served Upon Natural Energy Utility Corporation was served upon
the parties on the Service List below by regular U.S. Mail and electronic mail this 12th day
of April, 2010.

Brooke E. Leslie (gmc)

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COLUMBIA GAS OF KENTUCKY, INC.

SERVICE LIST

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