

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

COLUMBIA GAS OF KENTUCKY, INC.)	
)	
COMPLAINANT)	
)	
v.)	CASE NO.
)	2009-00340
)	
NATURAL ENERGY UTILITY CORPORATION)	
)	
DEFENDANT)	

SECOND DATA REQUEST OF COMMISSION STAFF
TO NATURAL ENERGY UTILITY CORPORATION

Natural Energy Utility Corporation ("NEUC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than April 26, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

NEUC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which NEUC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to NEUC's response to Item 1 of the First Data Request of Commission Staff ("Staff's First Request").

a. Confirm that the two customers referenced in this response are customers Jones and Wells indicated in the response to Item 3.

b. Are these customers located on Florida Street?

c. NEUC's response to Item 1.b. states that the two customers are "served off the line that is located on and passes through the mall property." The map provided as Exhibit 1 of NEUC's Answer and Motion to Dismiss filed September 8, 2009 shows that the line from which these customers are served interconnects with the line that passes through the mall property at the outside edge of the mall property, apparently at McKinley Street. Confirm if this is correct.

d. The line that passes through the mall property appears to originate at a gas well, labeled "#61." Confirm whether this is correct and, if so, whether NEUC takes gas from that well.

2. Refer to NEUC's responses to Item 3 of Staff's First Request and to Item 2 of Columbia Gas of Kentucky, Inc.'s ("Columbia") data requests served upon NEUC ("Columbia's First Request"). Both responses discuss customers located at each end of the mall property. Provide a map similar to that in Exhibit 1 of NEUC's Answer and Motion to Dismiss showing the location of Alf Large on Oakview Road in relation to the mall property.

3. Refer to NEUC's responses to Item 7 of Staff's First Request and to Item 3 of Columbia's First Request.

a. Confirm that Patrick Watson requested the line relocation in June 2007, and that the relocation occurred in August 2009 pursuant to his request.

b. Explain whether Patrick Watson requested the two-year delay of the line relocation. If not, explain why the delay occurred and why the relocation then took place in August 2009.

c. On the map provided in response to Item 2 of this request, show the location of Patrick Watson's property in relation to the mall property and indicate the former and current location of the driveway referenced on page 5 of Mr. Freeman's Testimony.

d. At what address does Patrick Watson receive service? On the map provided in response to Item 2 of this request, show the location of the service address.

e. Confirm whether the line relocation referenced in the response to Staff's Item 7 is accurately portrayed by the green and red lines shown on Columbia's map provided in response to Item 9 of the First Data Request of Commission Staff to Columbia. If not, on the map provided in response to Item 2 of this request, include lines that accurately reflect the location of NEUC's line prior to the relocation and replacement and after the relocation and replacement.

4. Refer to NEUC's response to Item 7 of Columbia's First Request. Confirm that the relocation that is the subject of the question was requested in June 2007 but did not occur until August 2009.

5. Refer to Columbia's response to Item 3 of NEUC's First Request. Using the monthly gas usage shown on the bills for each customer, provide the calculation of each customer's bill for each month for which bills were provided as though the customer had been a NEUC customer using the NEUC rates in effect for each month.


6. Has the owner of the mall properties indicated that she is expecting a lower bill if she were served by NEUC rather than Columbia?

7. Has NEUC offered the owner of the properties a special contract rate which is less than NEUC's tariffed rate? If yes, provide the offered rate. If no, has NEUC provided the owner of the properties the rate structure and associated rate she would be charged pursuant to NEUC's tariffed rate if she were to become a NEUC customer? If applicable, for the offered contract rate or the tariffed rate information, when was the offer or the rate information provided to the owner of the properties?

8. Refer to Columbia's response to Item 7 of NEUC's First Request. Explain whether 250 feet of pipeline is omitted from NEUC's map. If yes, include the omitted section of pipeline on the previously referenced map.

9. Explain whether NEUC was required to install new customer service lines to serve the three customers requesting NEUC service. Include in the explanation whether these lines are the customers' responsibility pursuant to NEUC's tariff, original sheet No. 11, or the utility's responsibility.

10. Refer to NEUC's response to Item 2 of Staff's First Request. Provide a summary of the terms of the mutual agreement, the intent of the parties and the date the agreement was reached.



Jeff Derouen
Executive Director
Public Service Commission
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DATED: APR 12 2010

cc: Parties of Record

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