

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF CITIPOWER,	)	
LLC FOR (1) AN ADJUSTMENT OF RATES	)	
PURSUANT TO 807 KAR 5:076; (2) APPROVAL	)	
FOR A CERTIFICATE OF PUBLIC	)	CASE NO.
CONVENIENCE AND NECESSITY TO	)	2019-00109
PURCHASE PIPELINE AND OTHER RELATED	)	
ASSETS; AND (3) APPROVAL OF FINANCING	)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO CITIPOWER, LLC

Citipower, LLC (Citipower), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due on or before January 23, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the witness responsible for responding to the 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.

Citipower 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 Citipower 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 respond completely and precisely.

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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Citipower shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a detailed update on the status of Citipower's purchase of the Herbert White pipeline by:

a. Describing any material communications between Citipower and the owners of the Herbert White pipeline;

b. Describing what needs to be done to finalize the purchase of the Herbert White pipeline or determine that Citipower will not purchase the pipeline;

c. Describing the timeline under which Citipower now anticipates completing the purchase of pipeline or determining that it will not purchase the pipeline; and

d. Stating whether and, if so, when Citipower anticipates finalizing the terms and conditions of the financing for the purchase of the pipeline.

2. Provide any written contracts, agreements, letters of intent, or similar documents not previously provided between Citipower and the owners of the Herbert White pipeline regarding the purchase of the pipeline and between Citipower and any lender regarding financing for the purchase of the Herbert White pipeline.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED JAN 17 2020

cc: Parties of Record

\*CitiPower, L.L.C.  
37 Court Street  
P. O. Box 1309  
Whitley City, KY 42653

\*L Allyson Honaker  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504

\*David S Samford  
Goss Samford, PLLC  
2365 Harrodsburg Road, Suite B325  
Lexington, KENTUCKY 40504