

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE GAS	)	
COSTS OF JOHNSON COUNTY GAS	)	CASE NO.
COMPANY, INC. AND HALL, STEPHENS AND	)	2020-00122
HALL GAS COMPANY PURSUANT TO KRS	)	
278.2207, AND KRS 278.274	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO HALL, STEPHENS AND HALL GAS COMPANY

Hall, Stephens and Hall Gas Company (Hall), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on October 1, 2020. Pursuant to the Commission's Orders in Case No. 2020-00085,<sup>1</sup> issued March 16, 2020, and March 24, 2020, Hall SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

Hall shall make timely amendment to any prior response if it obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Hall 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Hall shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Johnson County Gas Company, Inc.'s (Johnson County) responses to Commission Staff First Request for Information (Staff's First Request), Item 6.
  - a. Provide full background information on the office fire mentioned in the response.
  - b. Explain how the office fire has affected the records of Hall.

c. Explain whether Hall and Johnson County shared an office prior to the fire.

d. Explain whether any additional companies affiliated with Bud Rife were impacted by the mentioned office fire.

2. Refer to Johnson County's responses to Staff's First Request, Item 13.

a. Provide evidence for the three different pipelines used for natural gas transportation. Be sure to state the name of the pipelines and their location.

b. Note all city gates used by Hall for the transportation of natural gas to Johnson County.

3. Refer to Johnson County's responses to Staff's First Request, Item 14.

a. Explain whether Hall has sought to sell its natural gas to other customers outside of Johnson County. Provide evidence to support this claim. If not, explain why in full detail.

b. Explain why Hall continues to serve Johnson County if they continuously fail to make timely payments.

4. Refer to Johnson County's responses to Staff's First Request, Item 15(a). The response provided does not answer the request for information. Provide the services that Bud Rife Construction Company provides to Hall. This response should include a list of what Bud Rife Construction Company does for Hall, not a list of all services offered by Bud Rife Construction Company.

5. Refer to Johnson County's responses to Staff's First Request, Item 15(b). Provide the rate at which Bud Rife Construction Company would bill Hall for each of the services it provided to Hall.

6. Explain in detail the role Bud Rife plays in Hall.
7. Explain whether Bud Rife is paid by salary or hourly for his position in Hall.



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Lindsey L. Flora  
Deputy Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED SEP 14 2020

cc: Parties of Record

Case No. 2020-00122

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