

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DELTA	)	
NATURAL GAS COMPANY, INC. FOR AN	)	CASE NO.
ADJUSTMENT OF ITS RATES AND A	)	2021-00185
CERTIFICATE OF PUBLIC CONVENIENCE AND	)	
NECESSITY	)	

COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION  
TO DELTA NATURAL GAS COMPANY, INC.

Delta Natural Gas Company, Inc. (Delta), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on November 8, 2021. The Commission directs Delta to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. 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 preparer or the person supervising the preparation of the response on behalf of the entity

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Delta shall make timely amendment to any prior response if Delta 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 Delta fails or refuses to furnish all or part of the requested information, Delta 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, Delta 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 the history of Delta's provision of farm tap service before the acquisition of People's Gas farm customers, beginning with its earliest provision of gas to customers served pursuant to KRS 278.485.

2. Provide either a listing of locations or a map showing where farm tap services are being provided by Delta, and the associated source and ownership of gas supply and transmission for each. The information provided should indicate the proximity to Delta's regulated utility system.

3. State whether any farm tap customers are supplied from wells in which Delta has ownership interest. If yes, provide details.

4. Describe the quality of gas supplied to farm tap customers. The response should include but not be limited to: whether any dehydration equipment is used, whether the gas is odorized, and whether compression equipment is used for the purpose of delivering gas to farm tap customers.

5. State whether the character of service to any farm tap customers has changed over time. The response should include but not be limited to: whether any previous farm tap customer lost service due to inadequate gas supply or for any other reason related to availability of gas or transmission service, whether Delta has contracted for gas to supply farm tap customers because of a loss of previous supply, and whether Delta has changed the designation of any customer from farm tap to regulated utility customer.

6. Explain whether Delta believes its farm tap customers receive a relatively comparable level of gas supply and service as its regulated utility customers, and why.

7. Provide the number of farm tap customers Delta has served annually for the last ten years and the number it is currently serving. Customers added due to the acquisition of People's Gas should be shown separately.

8. State whether Delta serves any "free gas" customers who receive gas in exchange for pipeline crossing their property. If so, state how many and where they are located.

9. State whether Delta contracts for any gas to serve farm tap customers. If yes, explain why Delta considers those customers to be farm tap customers.

10. Explain why Delta considers the recently acquired People's Gas customers to be farm tap instead of utility customers.

11. State who owns the lines from which People's Gas farm tap customers are served.

12. Describe the transactions involved in the provision of farm tap gas supply and transmission service to the individual People's Gas delivery points.

13. Provide a discussion of the existing Delta farm tap customers compared to the recently acquired People's Gas customers, with respect to their designations as farm tap customers pursuant to KRS 278.485. The discussion should include, but not be limited to, the differences in ownership and quality of gas supplied, ownership and use of transmission facilities, and customers' relative assurance of gas supply.

14. Refer to Delta's current tariff on file with the Commission, P.S.C. No. 12, First Revised Sheet No. 15.

a. Regarding the \$20 collection charge, explain if this charge is assessed whether service is disconnected or not when a Delta representative makes a trip to the premises of a customer for the purpose of terminating service.

b. Regarding the \$60 reconnection charge, explain whether this charge includes both the cost of disconnection and reconnection or whether it just includes the cost of reconnection.

15. Refer to Delta's response to Commission Staff's First Request for Information, Items 52 and 53. As the amount of non-recurring charge revenue for the years 2016 to 2019 ranged from \$282,145 to \$334,760, explain why \$82,422 should be considered a reasonable non-recurring charge revenue forecast for calendar year 2022.

16. Refer to Delta's response to Commission Staff's Fourth Request for Information (Staff's Fourth Request), Item 2.

a. Explain whether service would be refused if a customer refused to provide or did not have photo identification.

b. Explain whether there are other forms of identification Delta would accept in lieu of photo identification.

c. Explain whether service would be refused if a customer failed to provide their complete Social Security Number, last four digits of their Social Security Number, or their Driver's License Number.

d. Explain whether Delta retains the customer's Social Security Number or Driver's License Number. If so, explain the measures Delta takes to protect such information.

17. Refer to Delta's response to Staff's Fourth Request, Item 9(b). Explain why a new owner with no affiliation with the previous owner would be responsible for the previous owner's account balance if they requested a continuance of service.



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cc: Parties of Record

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