

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF B&S OIL &)	
GAS COMPANY FOR INITIAL RULES,)	CASE NO.
REGULATIONS AND RATES FOR FURNISHING)	2021-00484
GAS SERVICE PURSUANT TO KRS 278.485)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO B&S OIL & GAS COMPANY

B&S Oil & Gas Company (B&S), 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 June 22, 2022. The Commission directs B&S to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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 question to which the response is made and 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

¹ 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).

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

B&S shall make timely amendment to any prior response if B&S 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 B&S fails or refuses to furnish all or part of the requested information, B&S 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, B&S 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 B&S's response to Commission Staff's First Request for Information (Staff's First Request), Item 5(a), Exhibits 3, 5, and 7. Also, refer to B&S's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 5.

a. Explain the distinction between the transportation expense for the Service Trip Charge, which is listed as \$10, and the transportation expense for the Disconnect Fee and Reread Meter Charge, which are both listed as \$2.50.

b. Explain why 20 round trip miles were used to calculate the transportation expense for the Service Trip Charge while only 7 miles were used to calculate transportation expense for the Disconnect Fee and Reread Meter Charge.

2. Refer to B&S's responses to Staff's First Request, Items 11 and 12, and Commission Staff's Second Request for Information (Staff's Second Request), Item 11(d).

a. State whether B&S's system currently includes gathering lines or only consists of wells.

b. State whether there are approximately 20 potential farm tap customer connections located within one-half air mile of B&S's existing gas lines or planned gas lines.

c. State how many potential farm tap customer connections exist within one-half air mile of all lines that B&S intends to construct to serve Diversified and any other entity.

d. State whether any of the approximate 20 currently known potential farm tap connections, or any future possible farm tap connections identified above, were customers of B&H Gas Company when it was previously owned by Mr. Bud Rife. If so, state how many.

e. Provide a system map or maps that show B&S's natural gas system, including the location of current and proposed lines, the location of producing wells, and the location of prospective farm tap customers. Include a legend that separately identifies current and proposed lines, producing wells, and customers.

f. Provide the latitude and longitude of the gas wells.

3. Refer to B&S's responses to Staff's First Request, Item 14, and Staff's Second Request, Item 11.

a. Provide the names of all entities to whom B&S is currently selling gas, or state whether B&S's gas is currently shut in.

b. If B&S is not currently selling gas to Diversified Oil & Gas (Diversified) or any other entity, explain when it expects to begin selling gas to Diversified, and describe in detail what needs to happen before such sales will take place.

4. Refer to B&S's responses to Staff's First Request, Item 20, and Staff's Second Request, Item 11(c).

a. Describe the status of any pipeline construction that will be necessary to serve Diversified or any other entity.

b. Provide any contracts between B&S and Diversified, or copies of any communication between B&S and Diversified which discuss sales from B&S to Diversified.

5. Refer to B&S's response to Staff's Second Request, Item 10. Describe the system that B&S used to serve Navitas KY NG, LLC, including the location and ownership of gas lines and connections. Provide the latitude and longitude of the interconnection points.

6. State whether B&S has received any requests or applications for farm tap service in the past 20 years. If so, provide the date and status of the requests or applications.

7. Refer to Case No 2020-00396,² Exhibit A_BH for B&H Gas Pipeline Locations. For each of the wells on these maps, submit answers to the following questions: Does the well belong to B&S? Does the well belong to the proposed B&S farm tap system? Is the well a producing well or a shut-in well? Does B&S have a permit from the Division of Oil and Gas to produce gas from this well? If so, provide a permit number and a copy of the permit.

- a. On Sheet 1 of 9, there is a well named Well.
- b. On Sheet 4 of 9, there are 3 wells named Tram Well #1, #2 and #3.
- c. On sheet 5 of 9, there is a well named Mare Creek Well.
- d. On Sheet 7 of 9, there is a well named Country Kitchen Well.
- e. On Sheet 7 of 9, there is a well named Well.
- f. On sheet 8 of 9, there is a well named Betsy Layne Well.
- g. On sheet 8 of 9 there is a well named Jim Loar Well.

8. Refer to Case No. 2020-00396, Exhibit A_BH for B&H Gas Pipeline Locations and Exhibit E, Base Contract for Sale and Purchase of Natural Gas.

- a. Provide a copy of the current disputed contract between B&S and Navitas.
- b. Provide the locations of the delivery points, Tram (2), Betsy Layne (3), and Mare Creek (1) as found on page 13 of 13 of the Base Contract. Place the locations on Exhibit A_BH by annotating the pdf sheets.

² Case No. 2020-00396, *Electronic Application of Navitas KY NG, Johnson County Gas Company, and B & H Gas Company for Approval of Acquisition, Transfer of Ownership, and Control of Natural Gas Utility Systems* (Ky. PSC Apr. 27, 2021).



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DATED JUN 10 2022

cc: Parties of Record

Case No. 2021-00484

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