

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF LINDSEY &)	
ELLIOTT GAS CO. FOR INITIAL RULES,)	CASE NO.
REGULATIONS, AND RATES FOR FURNISHING)	2023-00225
GAS SERVICE PURSUANT TO KRS 278.485)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO LINDSEY & ELLIOTT GAS CO.

Lindsey & Elliott Gas Co. (Lindsey & Elliott Gas), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 29, 2023. The Commission directs Lindsey & Elliott Gas 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.

Lindsey & Elliott Gas shall make timely amendment to any prior response if Lindsey & Elliott Gas obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Lindsey & Elliott Gas fails or refuses to furnish all or part of the requested information, Lindsey & Elliott Gas shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Lindsey & Elliott Gas 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 the proposed tariff sheet. Also, refer to Lindsey & Elliott Gas's responses to Commission Staff's First Request for Information (Staff's First Request), Attachment, page 175. Confirm that cost support for the proposed rates of \$18.00 minimum monthly bill and \$9.00 per Mcf as listed on the proposed tariff sheet is included on page 175 of the Attachment. If so:

a. Confirm that meter reading takes 20 hours per month, an estimated 240 hours per year. If not, explain how the 20 hours were derived.

b. State whether the eight hours shown for Mowing, Blowing Drips, Painting, Placing Methanol is per customer per year, or 432 hours annually based on 54 customers. If not, define what the eight hours represents.

c. Confirm that Callouts After Hours takes an estimated 60 hours annually. If not, explain how the estimation was derived.

d. Confirm that administrative activities take an estimated 162 hours annually based on 54 customers. If not, explain how the estimation was derived.

2. Refer to Lindsey & Elliott Gas's response to Staff's First Request, Item 1(a). In light of this response, state whether Lindsey & Elliott Gas would be willing to use a rate design consisting of a monthly customer with no gas usage included and a volumetric charge for all Mcf used, which would be more consistent with widely used rate designs of other gas utilities and companies.

3. Refer to Lindsey & Elliott Gas's response to Staff's First Request, 1(b). Also, refer to Lindsey & Elliott Gas's response to Staff's First Request, Attachment, page 175 and pages 201–202.

a. Confirm that the average gas cost rate of \$4.48/Mcf that is included on page 175 of the Attachments is an average per MMBtu rate based on information provided on pages 201–202 of the Attachment.

b. Confirm whether the \$4.48/Mcf rate should be adjusted by the Btu factor to calculate a rate per Mcf for the gas cost. If not, then explain why.

4. Refer to Lindsey & Elliott Gas's response to Staff's First Request, Item 2. Provide an expanded response to the previous request of Staff's First Request, Item 2, by providing detailed cost support for each charge, which should include each component of the charge (time, mileage, equipment, materials, labor, etc.), and explaining whether the labor associated with these services is already included in Lindsey & Elliott Gas's calculation of its monthly customer charge and commodity rate. Where possible, supporting documentation such as invoices should be provided. If Lindsey & Elliott Gas cannot provide the requested information, explain why it is not able to respond to the request.

5. Refer to Lindsey & Elliott Gas's response to Staff's First Request, Item 6.

- a. Provide annual Mcf sales for each of the years indicated.
- b. Explain why customer numbers have declined for the years indicated.
- c. Based on the four years of customer numbers provided, explain why 54 customers was used in the rate calculations.

6. Refer to Lindsey & Elliott Gas's response to Staff's First Request, Item 10. Also, refer to Lindsey & Elliott Gas's response to Staff's First Request, Attachment, page 172. Confirm that the unweighted average Btu factor is 1,416.45 based on the information provided on page 172 of the Attachments.

7. Refer to Lindsey & Elliott Gas's response to Staff's First Request, Item 12. State whether free gas customers and volumes are included in the customer numbers and Mcf volumes used to calculate farm tap rates.

8. Refer to Lindsey & Elliott Gas's response to Staff's First Request, Item 26, Attachment. Also refer to the proposed tariff.

a. Explain why the rules and regulations contained in the Domestic Gas Service Agreement were not included in Lindsey & Elliott Gas's proposed tariff.

b. Under Establishing Domestic Service, Service Charge, in the Domestic Gas Service Agreement, explain what the \$100 the customer will pay Lindsey & Elliott Gas at the time of execution of the contract covers and explain whether the charge is included in the proposed tariff.

c. Confirm that Lindsey & Elliott Gas is not currently proposing to require a deposit to secure payment of bills.

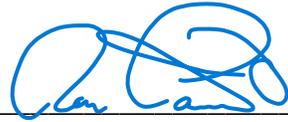
9. Refer to Lindsey & Elliott Gas's response to Staff's First Request, Item 26, Attachment. Also refer to the proposed tariff.

a. Under Gas Measurement, Meter Tests, Payment for Tests, in the Domestic Gas Service Agreement, provide the amounts of the meter test charge and explain why the meter test charge was not included in the proposed tariff.

b. Under Bills and Payment Thereof in the Domestic Gas Service Agreement, explain why it states that gas can be shut off upon 24 hours' notice for nonpayment of bills or violation of the rules and regulation when the proposed tariff states that 10 days' notice will be provided to the customer prior to service being disconnected.

c. Under Tampering in the Domestic Gas Service Agreement, explain why the charges related to tampering were not included in the proposed tariff.

10. Provide witness verifications for the responses provided to Staff's First Request filed on August 25, 2023.



FWZ

Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED SEP 07 2023

cc: Parties of Record

Case No. 2023-00225

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