

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DELTA	)	
NATURAL GAS COMPANY, INC. FOR	)	CASE NO.
APPROVAL OF LOGO DISCLAIMER AND	)	2024-00057
NOTICE OF NONREGULATED ACTIVITY	)	

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

Delta Natural Gas Company, Inc. (Delta), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on April 19, 2024. 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 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

---

<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).

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 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 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 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, 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. Confirm whether HomeServe USA Repair Management Corp (HomeServe) is a corporation authorized to do business in Kentucky. If not confirmed, provide the incorporation information.

2. Refer to the Application, page two. Delta stated it has entered into an agreement with HomeServe.

- a. Provide a copy of the agreement between HomeServe and Delta.

b. Explain whether this agreement is exclusive with HomeServe and Delta, or does Delta have the discretion to enter into a similar arrangement with another entity that wanted to offer similar services.

3. Confirm whether HomeServe has obtained or will be obtaining Delta's customer list. If confirmed, provide the terms, monetary or otherwise, under which Delta is providing said customer list.

4. Refer to the application at page three. Delta has estimated the annual revenue based on the number of participants in the Aqua HomeServe program in other states.

a. Explain how Delta will be compensated from the HomeServe program in Kentucky.

b. Explain how Delta will be compensated as the program matures.

c. Describe what steps Delta has taken to ensure that its customers will not be subsidizing the HomeServe program.

5. State whether HomeServe uses any other format that would in turn use the Delta name or logo, including but not limited to newspaper advertising, advertising fliers, uniforms, vehicles, business cards, etc.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED MAR 22 2024

cc: Parties of Record

Case No. 2024-00057

\*John B Brown  
Chief Financial Officer  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

\*Mary Ellen Wimberly  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Monica Braun  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391