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IRIS G. SKIDMORE

Via Hand-Delivery

July 18, 2013

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Application of Columbia Gas of Kentucky, Inc. for an Adjustment in Rates
Case No. 2013-00167

Dear Mr. Derouen:

Enclosed for filing in the above styled action are an original and ten copies of CAC's First Request for Information to Columbia Gas of Kentucky, Inc. on behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.

Sincerely,


Iris G. Skidmore

Enclosure

JUL 18 2013

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA)	
GAS OF KENTUCKY, INC. FOR AN)	CASE NO. 2013-00167
ADJUSTMENT OF RATES)	

**CAC'S FIRST REQUEST FOR INFORMATION TO
COLUMBIA GAS OF KENTUCKY, INC.**

* * * * *

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and submits its First Request for Information to Columbia Gas of Kentucky, Inc. (Columbia Gas). Please identify the company witness or witnesses who will be prepared to answer questions concerning each request.

1. How many Columbia Gas residential accounts were shut off for non-payment in each year 2008, 2010, 2011, and 2012?
2. In 2009, how many Columbia Gas residential accounts were shut off for non-payment prior to October 26, 2009, and how many were shut off for non-payment after that date?
3. How many Columbia Gas residential accounts were shut off for non-payment in the time period January 11, 2013 through the latest date in 2013 where records are available?
4. How many Columbia Gas residential accounts received payments from a third-party assistance program or agency (LIHEAP, WinterCare, etc.) in each year 2008, 2010, 2011, 2012 and through the latest date in 2013 where records are available?

5. In 2009, how many Columbia Gas residential accounts received payments from a third-party assistance program or agency (LIHEAP, WinterCare, etc.) prior to October 26, 2009, and how many received such payments after that date?
6. What is the total amount of funding Columbia Gas has contributed in each year 2008, 2009, 2010, 2011, 2012 and thus far in 2013 to programs or organizations that directly assist its customers who have difficulty paying their bills? Please provide this information by ratepayer vs. shareholder funding.
7. How much have Columbia Gas ratepayers, through voluntary donations given through billing statements, contributed to the WinterCare Energy Fund in each year 2008, 2009, 2010, 2011, 2012, and thus far in 2013?
8. How many Columbia Gas ratepayers, through voluntary donations given through billing statements, contributed to the WinterCare Energy Fund in each year 2008, 2009, 2010, 2011, 2012 and thus far in 2013?
9. Please provide a list of Kentucky counties in which Columbia Gas provides service and the number of residential customers in each of those counties. If possible, provide this data in the form of an Excel spreadsheet.
10. For each of the past 12 months, please provide the average consumption (in Mcf) of residential customers of Columbia Gas.
11. For each of the past 12 months, please provide the average total monthly bill for residential customers of Columbia Gas (including all charges).
12. Please provide the unduplicated number (customers who were late multiple times should be counted only once) of residential accounts which were paid late at any time in 2008 , 2010, 2011, 2012 and thus far in 2013.

13. For 2009, please provide the unduplicated number (customers who were late multiple times should be counted only once) of residential accounts which were paid late at any time prior to October 26, 2009, and the total number of residential accounts which were paid late after that date.
14. Please provide the average monthly bill for residential customers of Columbia Gas in each of the years 2008, 2009, 2010, 2011, and 2012.
15. Is Columbia Gas' proposal to suspend annual adjustment of the Energy Efficiency Conservation Programs Revenue from Lost Sales contingent upon approval of the Revenue Normalization Adjustment?
 - a. If the RNA is not approved, how will Columbia Gas account for Revenue from Lost Sales in its planned, separate Demand Side Management filing?
16. Russell A. Feingold, in his filed testimony, notes on page 79 that he ran a simulation of the RNA rider over a three year historical period and found its total annual impact to be a range of \$2.87 to \$4.65. Is Mr. Feingold aware of any anomalies which could occur – and did not within the historical test period – that could cause the impact of the RNA to be significantly greater?
17.
 - a. If yes, please explain those situations and their potential impact on the RNA rider calculation.
18. Russell A. Feingold, in his filed testimony, explains on page 42 that the purpose for the proposed rate design (and associated Revenue Normalization Adjustment) is that the current rate design “works against the goal of ensuring that Columbia is provided a reasonable opportunity to recover its costs including a return of, and on, the capital that has been invested...”

- a. Did Mr. Feingold consider basing a mechanism such as the proposed RNA not on a guaranteed volumetric and associated revenue level for the Company but instead a guaranteed minimum or scaled rate of return?
 - b. Would not setting a fixed volumetric and revenue amount for basis of the RNA unfairly insulate the Company (and thus penalize customers) against declines in consumption by customers which are beyond their control, and thus penalize the customer base for conserving?
19. In revising the CHOICE program, did or would Columbia Gas consider providing customers with online access to pricing information – updated daily or some other frequency – for Columbia and all available suppliers in order to help customers make an informed, real time comparison and decision?

Respectfully submitted,



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COUNSEL FOR CAC

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2013, a true and accurate copy of the foregoing CAC's First Request for Information to Columbia Gas of Kentucky, Inc. was served by United States mail, postage prepaid, to the following:

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