



Lexington-Fayette Urban County Government  
DEPARTMENT OF LAW

Jim Gray  
Mayor

Janet M. Graham  
Commissioner

August 13, 2013

Mr. Jeff Derouen  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

Re: Case No. 2013-00167  
(Columbia Gas of Kentucky, Inc.)

Dear Mr. Derouen:

Please find enclosed herewith for filing an original and ten (10) copies of Lexington-Fayette Urban County Government's Supplemental Request for Information in the referenced matter.

Yours truly,

David J. Barberie  
Managing Attorney

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00402884

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 14 2013

PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF )  
KENTUCKY, INC. FOR AN ADJUSTMENT OF )  
RATES FOR GAS SERVICE )

CASE NO. 2013-00167

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT'S SUPPLMENTAL REQUEST FOR INFORMATION  
TO COLUMBIA GAS OF KENTUCKY, INC.**

Comes now the Lexington-Fayette Urban County Government ("LFUCG"), by counsel and pursuant to the Public Service Commission's Scheduling Order of July 16, 2013, and submits its Supplemental Request for Information to Columbia Gas of Kentucky, Inc. ("Columbia") to be answered in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

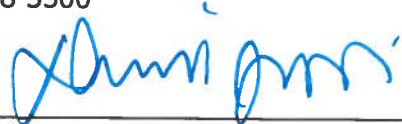
(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

WHEREFORE, the Lexington-Fayette Urban County Government submits this Supplemental Request for Information.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN  
COUNTY GOVERNMENT  
Department of Law  
200 East Main Street  
Lexington, Kentucky 40507  
(859) 258-3500

BY:



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Attorney

**FILING NOTICE AND CERTIFICATE**

I hereby certify that an original and ten (10) copies of this Supplemental Request for Information were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, on August 13, 2013:

Honorable Stephen B. Seiple  
Attorney at Law  
Columbia Gas of Kentucky, Inc.  
200 Civic Center Drive  
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P.O. Box 117  
Columbus, Ohio 43216-0117

Honorable David F Boehm  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Cincinnati, Ohio 45202

Brooke E Leslie  
Columbia Gas of Kentucky, Inc.  
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127 West Main Street  
Lexington, Kentucky 40507



ATTORNEY FOR LEXINGTON-FAYETTE  
URBAN COUNTY GOVERNMENT

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT'S SUPPLEMENTAL REQUEST FOR INFORMATION**

1. Refer to your response to LFUCG Request for Information Set One, Question No. 2. How many additional customers (and of which particular customer rate class) does Columbia anticipate adding to its overall system over the next 5 years? What is the anticipated level of additional revenue to Columbia as result of the addition of these customers?

2. Refer to your response to LFUCG Request for Information Set One, Question No. 9. What is the number of annual meter inspections performed by Columbia? What is the break down of this number by meter sampling program, odor complaint, or otherwise?

3. Refer to your response to LFUCG Request for Information Set One, Question No. 11. What is the estimate of the annual costs or expenses associated with disconnects for non-payment and for reconnect orders (please break down by category)?

4. Refer to your response to LFUCG Request for Information Set One, Question No. 15. What is the annual estimate of customers assisted for each of the last five (5) years?

5. Refer to your response to LFUCG Request for Information Set One, Question No. 16. Please explain in detail the "various types of technology for billing and payment options for nonresidential customers" which Columbia is exploring.

6. Refer to your response to LFUCG Request for Information Set One, Question No. 18. What is the estimated annual amount of savings in outside services expenses anticipated by Columbia?

7. Refer to your response to Attorney General Data Request Set One, No. 28. Is it Columbia's position that the "implicit intra-class subsidy that arises from one group of customers benefitting from conservation through savings on their bills that are greater than the cost savings experienced by the utility from that conservation" is currently occurring? If the answer is yes, please list each customer class for which this occurs and the relevant information and analysis supporting this conclusion.

8. Refer to your response to Attorney General Data Request Set One, No. 29. Please fully explain what is meant by the use of the term "excessive incentives".