

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF KENTUCKY,)	CASE NO.
INC. FOR AN ORDER APPROVING USE OF)	2011-00299
DISCLAIMER BY A NON-REGULATED AFFILIATE)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. ("Columbia"), pursuant to 807 KAR 5:001, is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Columbia shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Columbia fails or refuses to furnish all or part of the requested information, it 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.

1. Refer to Attachment D to the August 12, 2011 application, the sample letter to customers and, specifically, the last paragraph before the manager's signature.

a. Given that the letter includes the statement, "[c]overage costs can be conveniently added to your Columbia Gas bill," confirm whether this means that the letter will go only to Columbia customers.

b. If the letter will go only to Columbia customers, confirm whether this means that Columbia Retail Services ("CRS") has obtained, or will be obtaining, Columbia's customer list.

c. If providing its customer list to CRS is part of its arrangement with CRS, provide the terms, monetary or otherwise, under which Columbia is providing said customer list.

d. Explain how Columbia will be compensated by CRS for the cost of the billing service it will be providing CRS.

e. Describe, generally, what steps Columbia has taken to ensure that it and its customers will not be subsidizing CRS.

2. Explain whether the arrangement with CRS, and the terms thereof, are exclusive to Columbia and CRS or if Columbia would have the discretion, and the willingness, to enter into a similar arrangement with a non-affiliated entity that wanted to offer services similar to those of CRS.

3. Explain whether CRS uniforms or vehicles display the word "Columbia" without the words "Retail Services" also being shown. If yes, provide the exact wording shown on the vehicles or uniforms without abbreviations unless abbreviations are what are used on such items.

4. Refer to Attachment D to the August 12, 2011 application, the sample letter to customers and, specifically, the last paragraph of the Authorization Form.

a. Provide a copy of CRS's Customer Agreement referred to in the last paragraph of the Authorization Form.

b. Provide a copy of any agreements or information provided to those customers who do not qualify for billing on their monthly utility statements.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED **OCT 14 2011**

cc: Parties of Record

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