

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF)
KENTUCKY, INC. FOR AN ADJUSTMENT) CASE NO. 2016-00162
IN RATES)

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S SUPPLEMENTAL REQUESTS
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 June 10, 2016, and submits its Supplemental Requests 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.

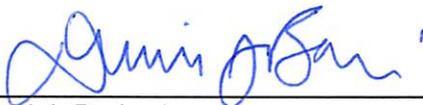
(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, 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 Requests for Information.

Respectfully submitted,

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

BY:

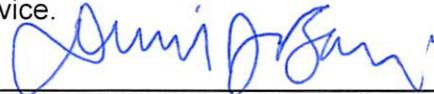


David J. Barberie
dbarberi@lexingtonky.gov
Managing Attorney
Andrea C. Brown, Attorney
abrown2@lexingtonky.gov
Department of Law

200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500
Attorneys for Lexington-Fayette
Urban County Government

FILING NOTICE AND CERTIFICATE

I hereby certify that the foregoing is a true and accurate copy of the document(s) to be filed in paper medium with the Public Service Commission (which include a cover letter serving as the required Read1st document); that the electronic submission of these documents to the Commission was performed on August 4, 2016; that copies of these documents were mailed via first class U.S. Mail, postage prepaid, to the Kentucky Public Service Commission on August 4, 2016; and that there are currently no parties that have been excused from participation by electronic service.



ATTORNEY FOR LEXINGTON-FAYETTE

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

1. Under how many different types of customer rate classes does LFUCG currently make payments to Columbia? For each type of class, please provide the following information:

- (a) The type of customer rate class;
- (b) The number of LFUCG accounts in each such class;
- (c) The total amount paid by the LFUCG for each such class during the last 12 month period.

2. For each separate LFUCG account please provide a detailed analysis showing the impact of all of the elements of Columbia's proposed rate increase versus the existing rate using the most recent 12 month actual usage and billing data. Please also provide a detailed explanation of the formula that was used to obtain this information.

3. What is the current number of Columbia's employees who are located in Fayette County? Please also provide the job title (and general description of work performed if not apparent from the job title) and the number of persons holding that job title in Fayette County.

(a) Is the number of these employees expected to increase or decrease over the next 5 years? Please provide a breakdown by job title and an explanation with your answer.

(b) Will the proposed new training facility result in the hiring of any additional employees?

4. Please provide the street address(es) and hours of operation of every location in Fayette County to which a customer can go to pay a bill or have a question answered in a face-to-face setting.

5. Does Columbia have a timeframe for offering electronic data interchange (EDI) billing, both invoice and receipt of payment, to its Major Account customers?

6. Approximately what percentage of Columbia's income is derived from customers in Fayette County?

7. Will all of the proposed additional revenue attributable to customers located in Fayette County be included in the franchise fee calculation payable to LFUCG under the applicable franchise agreement? Please list any proposed sources of revenue from Fayette County customers which would not be included and explain why Columbia believes they should not be included.