

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JUN 26 2007
PUBLIC SERVICE
COMMISSION

IN THE MATTER OF AN ADJUSTMENT)
OF GAS RATES OF COLUMBIA GAS) CASE NO. 2007-00008
OF KENTUCKY, INC.)

**COLUMBIA GAS OF KENTUCKY, INC.'S
DATA REQUESTS SERVED UPON
INTERSTATE GAS SUPPLY, INC.**

Pursuant to the Commission's Order in this case, dated April 19, 2007, Columbia Gas of Kentucky, Inc. ("Columbia") propounds the following data requests to be answered by Interstate Gas Supply, Inc. ("IGS") in writing. These data requests shall be deemed to be continuing so as to require supplementary answers between the time the answers are served and the time of hearing.

INSTRUCTIONS FOR ANSWERING

(1) All responses shall be in writing, and each response shall identify the name and position of the person(s) who provided the response. Each data requests shall be answered separately and fully. Each response shall first restate the data request being answered.

(2) All responses to data requests shall be served upon Columbia at the offices of its attorneys in this proceeding:

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200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117
Telephone: (614) 460-4648
Fax: (614) 460-6986
Email: sseiple@nisource.com

Richard S. Taylor
225 Capital Avenue
Frankfort, KY 40601
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(3) You are reminded that all answers must be made separately and fully, and that an incomplete or evasive answer is a failure to answer.

(4) You are under a continuing duty to seasonably to supplement your response with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters, the identity of any person expected to be called as an expert witness at hearing, and the subject matter of which he is expected to testify, and to correct any response which you know or later learn is incomplete or incorrect.

(5) All information is to be divulged which is in your possession or control or within the possession and control of your attorneys, investigators, agents, employees, or other representatives of you or your attorney.

(6) Where a data request calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.

(7) Where an objection is interposed to any data request, or part thereof, answer the data request all parts thereof to the extent not objected to.

(8) Identification. As used herein, the terms “identification,” “identify,” or “identity,” when used in reference to (a) a natural individual, require you to state his or her full name and residential and business address; (b) a corporation, require you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the address of all of its offices in Kentucky; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a document, require you to state the number of pages and the nature of the document (e.g., letter of memorandum). Its title, its date, the name or names of its authors and recipients, and its present location and custodian; (e) a communication, require you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the person participating in the communication and to state the date, manner, place, and substance of the communication.

(9) Identification of documents. With respect to each data request, in addition to supplying the information requested, you are to identify all documents that support, refer to, or evidence the subject matter of each data request and your answer thereto.

If any or all documents identified herein are no longer in your possession, custody, or control because of destruction, loss, or any other reason, then do the following with respect to each and every such document: (a) describe the nature of the document (e.g., letter of memorandum); (b) state the date of the document; (c) identify the persons who sent and received the

original copy of the document; (d) state in as much detail as possible the contents of the document; and (e) state the manner and date of disposition of the document.

If you contend that you are entitled to withhold from production any or all documents identified herein on the basis of the attorney-client privilege, the work-product doctrine, or other ground, then do the following with respect to each and every document; (a) describe the nature of the document (e.g., letter of memorandum); (b) state the date of the document; (c) identify the persons who sent and received the original and a copy of the document; (d) state the subject matter of the document; and (e) state the basis upon which you contend you are entitled to withhold the document from production.

(10) Representative. As used herein, the term “representative” means any and all agents, employees, servants, officers, directors, attorneys, or other persons acting or purporting to act on behalf of the person in question.

(11) Person. As used herein, the term “person” means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments, and other units therein, and shall include, but not be limited to, a public or private corporation, partnership, joint venture, voluntary or unincorporated association, organization, proprietorship, trust, estate, governmental agency, commission, bureau, or department.

(12) Document. As used herein, the term “document” means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram

cable, report, record, contract, agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, electronic mail, computer discs or tapes, or computer-produced interpretations thereof, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody, or control or which was, but is no longer, in your possession, custody, or control.

(13) Communication. As used herein, the term “communication” means any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, dialogues, discussions, interviews, consultations, agreement, and other understandings between or among two or more persons.

(14) Contention Data Request. When a data request requires you to “state the basis of” a particular claim, contention, or allegation, state in your answer the identity of each and every communication and each and every legal theory that you think supports, refers to, or evidences such claim, contention, or allegation.

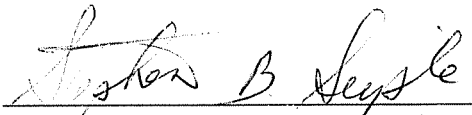
(15) The Word “Or.” As used herein, the word “or” appearing in a data request should not be read so as to eliminate any part of the data request, but, whenever applicable, it should have the same meaning as the word “and.” For example, a data request stating “support or refer” should be read as “support and refer” if an answer that does both can be made.

DATA REQUESTS

1. Regarding the Direct Testimony of Scott White, page 2, lines 3-4. Please describe how Mr. White has been directly involved in unbundling residential natural gas services in Kentucky.
2. Regarding the Direct Testimony of Scott White, page 2, lines 8-10. Please provide the case numbers in which Mr. White has testified before the Kentucky Public Service Commission.
3. Regarding the Direct Testimony of Scott White, page 7, lines 21-29. Please explain Mr. White's understanding of how the ten cent throughput charge was established.
 - (a) If Columbia were to discontinue the recovery of incremental Choice Program costs through the ten cent surcharge, please describe how Mr. White would propose that Columbia should instead recover the incremental costs of the Choice Program, including from which customer classes the Choice Program costs should be recovered.
4. Does Mr. White believe that Columbia's application in the instant rate case docket alters the terms of Columbia's Choice Program as previously approved by the Commission? If so, please explain why.
5. Regarding the Direct Testimony of Scott White, page 2, lines 20-23. Please describe all the fees that Mr. White believes are not included in Columbia's revenue requirement but that Columbia directly charges to Choice customers.
6. Regarding the Direct Testimony of Scott White, page 7, lines 12-19 Please explain why Mr. White believes that Columbia does not appear to incur any incremental costs for including a supplier's charges on customer bills.
7. Regarding the Direct Testimony of Scott White, page 12, lines 4-7. Is it Mr. White's belief that \$48,222,000 represents Columbia's working capital for gas in storage, as opposed to Columbia's total working capital requirement?

Dated at Columbus, Ohio, this 26th day of June, 2007.

Respectfully submitted,
COLUMBIA GAS OF KENTUCKY, INC.

By: 
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Attorneys for
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CERTIFICATE OF SERVICE

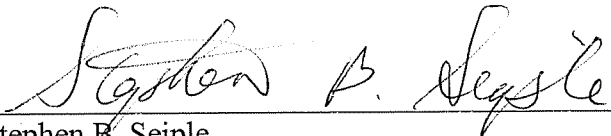
I hereby certify that a copy of the foregoing Motion to Strike of Columbia Gas of Kentucky, Inc. was served via either personal hand delivery, First Class U.S. Mail postage prepaid or overnight mail on the following parties, all on this 26th day of June 2007.

Hon. Dennis G. Howard, II
Hon. Lawrence W. Cook
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