



Mayor Jim Newberry

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

Department of Law

April 9, 2007

RECEIVED

APR 10 2007

PUBLIC SERVICE  
COMMISSION

Ms. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

Re: Case No. 2007-00008  
(Application of Columbia Gas of Kentucky, Inc.)

Dear Ms. O'Donnell:

Please find enclosed herewith for filing an original and 7 copies of the Lexington-Fayette Urban County Government's Initial Requests for Information in the referenced matter. Please contact me should you have any questions pertaining to the same.

Yours truly,

David J. Barberie  
Corporate Counsel

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HORSE CAPITAL OF THE WORLD

200 East Main Street Lexington, KY 40507 (859) 258-3500 Fax: (859)258-3538 www.lfucg.com

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

APR 10 2007

PUBLIC SERVICE  
COMMISSION

In the Matter of:

ADJUSTMENT OF RATES OF COLUMBIA GAS )  
KENTUCKY, INC. )

CASE NO. 2007-00008

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

Comes now the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel and pursuant to the Public Service Commission's Scheduling Order of March 16, 2007 and submits its Initial 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.

## **INITIAL REQUESTS FOR INFORMATION**

1. Can ratepayers expect any enhancement over the current existing level of service as a result of the proposed rate increase? If so, please provide a detailed response that includes the specific benefit or benefits to be provided to each particular customer rate class.

(a) More specifically, will the LFUCG obtain any additional benefit or benefits (level of maintenance or otherwise) as a result of the proposed increase? If so, please provide a detailed response that includes the specific benefit or benefits to be provided to each particular customer rate class.

2. How many additional customers (and of which particular customer rate class) does Columbia anticipate adding within Fayette County over the next 5 years? What is the anticipated level of additional revenue to Columbia as result of the addition of these customers?

3. How many different types of customer rate classes does the LFUCG currently make payments to Columbia under? 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; and

(d) The total net projected impact for each such class under the proposed rate increase.

4. For each separate LFUCG account please provide a detailed analysis showing the impact of the proposed rate versus the existing rate using the most recent 12 month actual useage and billing data. Please also provide a detailed explanation of the formula that was used to obtain this information.

5. Is Columbia willing to assist LFUCG in identifying LFUCG accounts for which the overall number of meters could be reduced or consolidated? Please provide a detailed explanation with your response.

6. Is LFUCG's account billing information available in electronic form either for each separate account or as a whole? Please provide a detailed explanation with your response. Is this information available on a monthly ongoing basis? Please provide a detailed explanation with your response.

7. How much money has Columbia spent on advertising or promotional activities in the last 5 years? If possible, please provide such information for Fayette County and describe in detail the nature (i.e., television, radio, billboard, etc.) and type (i.e. conservation of electricity, etc.) of such advertisement or promotion.

(a) What amount (and percentage), if any, of this advertisement was of material benefit to ratepayers in accordance with Commission regulation 807 KAR 5:016?

8. How frequently (on an annual basis) does Columbia perform meter inspections?

(a) Of these inspections, how frequently (on average) does the customer bear the associated costs or expenses?

(b) Are the costs or expenses associated with meter inspections otherwise reflected in Columbia's overall costs or expenses such as maintenance and operations?

(c) To what extent, if any, is a customer responsible for the costs associated with inspecting, repairing, and/or replacing a defective or nonworking meter?

9. How does Columbia determine the appropriate amount of the monthly charge in the event that it is determined the meter was not working correctly?

10. How frequently (on an annual basis) does Columbia disconnect or reconnect service?

(a) Are the costs or expenses associated with disconnecting or reconnecting service otherwise reflected in Columbia's overall costs or expenses such as maintenance and operations?

11. Does Columbia engage in non-regulated activities or in any way provide non-regulated service? If so, generally describe all such activities or services in detail and indicate the extent to which Columbia engages in or provides such activities or services.

(a) Do any Columbia employees spend any of their time engaged in such activities?

12. 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.

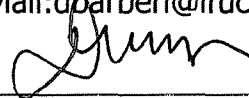
13. Please provide the street address(es) and hours of operation of every location in Fayette County to which a customer can go to pay a bill or have a question answered in a face-to-face setting.

14. Does Columbia currently provide customer or other assistance in the event of declared or other emergencies (flooding, etc.) in which part of the response and/or recovery effort requires a customer to re-light his or her pilot light? Please provide a detailed response.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN  
COUNTY GOVERNMENT  
Department of Law  
200 East Main Street  
Lexington, Kentucky 40507  
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BY:



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David J. Barberie  
Corporate Counsel  
Leslye M. Bowman  
Director of Litigation

NOTICE AND CERTIFICATATION

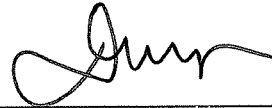
I hereby certify that an original and seven (7) copies of the Lexington-Fayette Urban County Government's Initial Requests for Information were filed with the Public Service Commission, attention: Beth O'Donnell, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail delivery, postage prepaid, on the following, all on this the 9th day of April 2007.

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URBAN COUNTY GOVERNMENT

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