

July 23, 2009

VIA OVERNIGHT MAIL

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

RECEIVED

JUL 24 2009

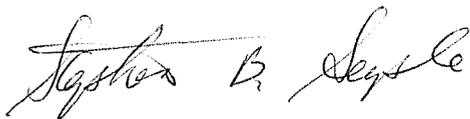
**PUBLIC SERVICE
COMMISSION**

RE: Case No. 2009-00141

Dear Mr. Derouen,

Enclosed for filing are the original and eleven (11) copies of Columbia Gas of Kentucky, Inc.'s responses to Constellation New Energy-Gas Division's Requests for Information. Please docket the original under seal as well as the ten (10) redacted copies and return the extra copy to me in the self addressed stamped envelope enclosed. Should you have any questions about this filing, please contact me at 614-460-4648. Thank you.

Sincerely,



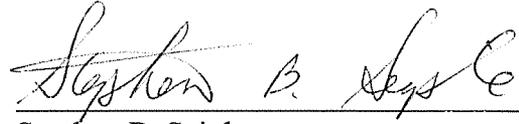
Stephen B. Seiple
Assistant General Counsel

Enclosures

cc: All Parties of Record
Hon. Richard S. Taylor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Responses of Columbia Gas of Kentucky, Inc., were served upon all parties of record by regular U. S. mail this 23rd day of July, 2009.



Stephen B. Seiple
Attorney for
COLUMBIA GAS OF KENTUCKY INC.

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**PUBLIC SERVICE
COMMISSION**

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 001:

Please identify the persons, by position, employer and workplace location, who will be responsible for administering CKY's proposed Price Protection Service ("PPS") program.

Response:

Columbia's proposed Price Protection Service will be administered by:
Director, Commodity & Performance
Distribution Customer Program Analyst

Both of these positions are within NiSource Corporate Services Co., and are located in Columbus, OH.

PSC Case No. 2009-00141
Constellation DR Set 1-2
Respondent(s): Erich Evans

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 002:

Please identify the persons, by position, employer and workplace location, who will be responsible for administering CKY's proposed Negotiated Sales Service ("NSS") program.

Response:

Columbia's proposed Negotiated Sales Service will be administered by:
Director, Commodity & Performance
Distribution Customer Program Analyst

Both of these positions are within NiSource Corporate Services Co. and are located in Columbus, OH.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 003:

Please provide an estimate of the annual cost to administer the PPS program, with such estimate being broken down by components, such as labor, advertising, professional services and the like.

Response:

Columbia has not completed a full study of what it will cost to operate the PPS program. Therefore we are only able to estimate some costs at this time.

The cost for labor of administering the program such as determining the prices, filing prices with the commission, and risk management activities are estimated to cost \$50K per year.

The cost of operating the program (customer enrollment & customer service) is unknown at this time because they are dependent on the level of advertising and enrollment. These costs are directly dependent on the number of customers who inquire about and/ or enroll in the program.

The cost of advertising is dependent on the marketing plan for the program. Columbia has not yet completed a marketing plan nor looked into advertising costs.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 004:

Please provide copies of all models, studies or other analyses, including work papers, of the annual revenues and expenses expected to be associated with the PPS program.

Response:

Columbia has not made any studies or analysis of the expected annual revenues and expenses from the PPS program.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION

Data Request 005:

Please provide an estimate of the annual cost to administer the NSS program, with such estimate being broken down by components, such as labor, advertising, professional services and the like.

Response:

Columbia has not completed a full study of what it will cost to operate the NSS program. Therefore we are only able to estimate some costs at this time.

The cost for labor of administering the program such as determining the prices, filing contracts with the commission, and risk management activities are estimated to cost \$40,000 per year.

The cost of operating the program (customer negotiations, customer enrollment & customer service) is unknown at this time because they are dependent on the level of advertising and enrollment. These costs are directly dependent on the number of customers who inquire about and/ or enroll in the program.

The cost of advertising is dependent on the marketing plan for the program. Columbia has not yet completed a marketing plan nor looked into advertising costs.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 006:

Please provide copies of all models, studies or other analyses, including work papers, of the annual revenues and expenses expected to be associated with the NSS program.

Response:

Columbia has not made any studies or analysis of the expected annual revenues and expenses from the NSS program.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 007:

Please identify the persons, by position, employer and workplace location, that will perform customer service responsibilities for PPS customers.

Response:

Columbia's proposed PPS program is a sales service rate. All customer service responsibilities will be handled like any other sales service customer, through Columbia's call center located in Smithfield, PA.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 008:

Please identify the persons, by position, employer and workplace location, that will perform customer service responsibilities for NSS customers.

Response:

Columbia's proposed NSS program is a sales service rate. All customer service responsibilities will be handled like any other sales service customer, through Columbia's call center located in Smithfield, PA.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 009:

Please describe in detail how CKY expects to advertise or promote its PPS and/or NSS programs, separately describing any plans to utilize its call center personnel, newspaper, television and/or radio commercials or the Internet.

Response:

Columbia has not yet developed marketing plans for the proposed PPS and NSS programs. As a sales service the existing call center personnel would be expected to respond to questions about PPS and NSS. Most likely Columbia will put information about these programs on its website.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 010:

Please state in detail the estimated cost of all advertising and/or promotion described in response to Request No. 9 on an annual basis and whether CKY intends to seek recovery of such costs from its customers other than, or in addition to, PPS and NSS customers. This response should include a statement of the amount or percentage of such costs CKY expects to recover from PPS and NSS customers and the amount or percentage of such costs CKY expects to recover from its other customers.

Response:

As stated in Columbia's response to Constellation Data Request No. 9, Columbia has not yet developed a marketing plan for PPS or NSS, therefore we do not have an estimate of the costs to advertise the programs. Columbia will not seek recovery for any of the advertising costs from any customers other than the PPS and NSS customers. Columbia will include the cost to advertise in the commodity rates it charges to PPS and NSS customers.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 011:

Please state whether CKY intends to advertise its PPS and/or NSS programs through the use of bill inserts in CKY's bills to customers other than PPS or NSS customers.

Response:

As stated in Columbia's response to Constellation's data request 1-9, Columbia has not yet developed marketing plans for the proposed PPS and NSS programs.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 012:

If the answer to Request No. 9 is yes, please state the estimated cost of such advertising on an annual basis and whether CKY intends to seek recovery of such costs from its customers other than, or in addition to, PPS and NSS customers. This response should include a statement of the amount or percentage of such costs CKY expects to recover from PPS and NSS customers and the amount or percentage of such costs CKY expects to recover from its other customers.

Response:

Please see Columbia's response to Constellation data request numbers 1-9 and 1-10.

PSC Case No. 2009-00141
Constellation DR Set 1-13
Respondent(s): Erich Evans

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 013:

Please provide copies of all models, studies or other analyses of the allocation of the costs expected to be associated with the PPS program.

Response:

No studies have been done on the expected cost allocation of the PPS program.

PSC Case No. 2009-00141
Constellation DR Set 1-14
Respondent(s): Erich Evans

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 014:

Please provide copies of all models, studies or other analyses of the allocation of the costs expected to be associated with the NSS program.

Response:

No studies have been done on the expected cost allocation of the NSS program.

PSC Case No. 2009-00141
Constellation DR Set 1-15
Respondent(s): Erich Evans

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 015:

Please provide copies of all models, studies or other analyses of the customers expected to utilize the PPS service.

Response:

No studies have been done on the customers expected to elect the PPS rate.

PSC Case No. 2009-00141
Constellation DR Set 1-16
Respondent(s): Erich Evans

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO CONSTELLATION REQUESTS FOR INFORMATION**

Data Request 016:

Please provide copies of all models, studies or other analyses of the customers expected to utilize the NSS service.

Response:

No studies have been done on the customers expected to elect the NSS rate.