

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

March 20, 2013

RE: Case No. 2012- 00428

Dear Mr. Derouen:

Please find enclosed an original and fourteen (14) copies of the Responses of Columbia Gas of Kentucky, Inc., to the Attorney General's Initial Request for Information dated February 27, 2013.

If you have any questions, please call me at (859) 288-0242 or email [jmcoop@nisource.com](mailto:jmcoop@nisource.com). Thank you.

Sincerely,

*Brooke E. Leslie (gmc)*

Brooke E. Leslie, Counsel  
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P.O. Box 117  
Columbus, Ohio 43216-0117  
Telephone: (614) 460-4648

Richard S. Taylor  
225 Capital Avenue  
Frankfort, Kentucky 40601

Attorneys for COLUMBIA GAS OF KENTUCKY, INC.

Enclosures

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KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 001  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
DATED FEBRUARY 27, 2013**

1. Since the Commission initiated Consideration of *the New Federal Standards of the Energy Independence and Security Act of 2007*, Administrative Case No. 2008-00408, has the company changed its position regarding Smart Grid? If so, how?

**Response:** No, the company has not changed its position.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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2. Are the technologies pertaining to the implementation of Smart Grid definitely known and proven?

- a. If yes, explain in detail every aspect from the use of each technology from the company to the end-user.
- b. If not, explain in detail what technologies are already advancing/improving as well as those that are envisioned on the immediate time horizon.

**Response:** As a natural gas distribution utility, the company does not have specific expertise on the technologies of the electric Smart Grid.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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3. In light of recent catastrophic storms over the past ten years (for example, the various ice storms, tornadoes, and strong winds), which electric companies have experienced, and for which the company may ultimately have sought regulatory assets, can the company affirmatively state that its basic infrastructure, including all of its generation, transmission and distribution facilities, have proven to be reliable 24 hours a day, seven days a week, 365 days a week? If not, for each and every storm that it affected the utility in excess of two days, please provide the following:

- a. The number of days before the company's last ratepayer's electricity was restored for each storm.
- b. The average number of days, or hours if applicable, that the average ratepayer's outage lasted for each storm.
- c. The average financial loss for the average ratepayer for each storm, if known.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 004  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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4. Does the company agree with the Attorney General that electricity is not considered a luxury service but a necessary commodity of modern life? If not, why not?

**Response:** The Company is not aware of the Attorney General having expressed this opinion, but generally agrees with the statement.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 005  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
DATED FEBRUARY 27, 2013**

5. Does the company agree that the fundamental reliability of its electric grid - i.e., the delivery of electricity to the end-user 24/7/365 - is paramount to the end-user's ability to monitor and/ or conserve his/her demand or electricity consumption? If not, why not?

**Response:** Not applicable. The company does not have its own electric grid.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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DATED FEBRUARY 27, 2013**

6. Please state whether the company is aware of any cybersecurity breaches effecting the electric and gas industries that have either occurred in the United States or internationally. If the answer is in the affirmative, please explain the details of the breaches *without exposing information that is not already in the public domain.*

**Response:** Columbia is generally aware of cybersecurity threats, however, is not aware of specific details of any breaches.

**COLUMBIA GAS OF KENTUCKY, INC.  
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7. Please confirm that the company is aware that the prior United States Secretary of Defense Leon Panetta, in speaking on the vulnerability of the nation's electric grid with the consequential safety and security concerns that ensue, warned the Senate Appropriations Committee on Defense that the risk to the United States could even be considered the equivalent of a "digital Pearl Harbor"<sup>4</sup>.

Is this concern of the vulnerability of the nation's electric grid shared by the company? If not, why not?

**Response:** I am not aware of the specific quote, however, Columbia generally agrees that safety and security are concerns shared by most Americans in today's world.

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<sup>4</sup> Comments by Secretary of Defense, Leon Panetta, U.S. Senate Appropriations Subcommittee on Defense, Hearing on FY 13 DoD Budget, June 13, 2012.  
<http://www.appropriations.senate.gov/webcasts.cfm?method=webcasts.view&id=08e51d6c-4a32-4fa4-b09c-a006fa63c976>  
<http://www.appropriations.senate.gov/webcasts.cfm?method=webcasts.view&id=08e51d6c-4a32-4fa4-b09c-a006fa63c976>



**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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8. With regard to cybersecurity in general, can the company unequivocally confirm that its system reliability is not vulnerable to a cybersecurity attack? If not, what could be the consequences? Please explain in detail as much as possible for the following:

- a. the company, and
- b. the company's ratepayers.

**Response:** Columbia takes cybersecurity seriously and has taken steps to protect itself, however, the company cannot guarantee that a breach could not occur. Consequences to Columbia and our customers could include, but are not limited to, financial loss, exposure of customer data and compromised service or deliverability.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 009  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
DATED FEBRUARY 27, 2013**

9. Please provide the names of the standards, protocols or policies which the company observes and/or implements in its maintaining its system reliability from cybersecurity threats.

**Response:** Please see response to PSC Request No. 115

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 010  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
DATED FEBRUARY 27, 2013**

10. Please provide copies of the standards, protocols or policies which the company observes and/or implements in its maintaining its system reliability from cybersecurity threats.

**Response:** Please see response to PSC Request No. 115

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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11. With regard to cybersecurity in general, can the company unequivocally confirm that its ratepayers' privacy of data cannot be compromised or otherwise divulged to any individual or entity not associated with the company, or a qualified third-party which has issues a non-disclosure statement or the ratepayers? If not, what could be the consequences? Please explain in detail as much as possible for the following:

- a. the company, and
- b. the company's ratepayers.

**Response:** Please see response to AG No. 8.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 012  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
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12. If a qualified third-party that has agreed to a non-disclosure statement and obtains ratepayers' private information, what guarantees exist that the information will not be disclosed, whether intentionally or unintentionally?

**Response:** Please see response to PSC Request No. 115

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 013  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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DATED FEBRUARY 27, 2013**

13. Please provide the names of the standards, protocols or policies which the company observes and/or implements in its maintaining its ratepayers' privacy data from cybersecurity threats.

**Response:** Please see response to PSC Request No. 115

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 014  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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14. Please provide copies of the standards, protocols or policies which the company observes and/or implements in its maintaining its ratepayers' privacy data from cybersecurity threats.

**Response:** Please see response to PSC Request No. 115

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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15. Given the vulnerability of the electric grid to cyberattacks, describe what analog (non-digital) means the company will have in place to insure reliability, including but not limited to the maintenance of legacy systems.

**Response:** Not applicable. Columbia is a natural gas distribution utility.



**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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16. What are the company's estimated costs to invest in order to fully implement Smart Grid?

a. Do any cost estimates include results of any modeling that may show the degree of exposure to the following risks: (a) hacking; (b) electronic magnetic pulses (EMPs, whether related to solar flares or otherwise); and/or (c) weather events? If so, provide a list of the modeling software used to produce any estimates, the scenarios and sensitivities examined, and any and all such results.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
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17. Please explain in detail what benefits, if any, the company expects its ratepayers to realize because of Smart Grid?

a. Does the company believe that societal benefits are to be considered in evaluating benefits? If so, detail those societal benefits and how they may be used in evaluations? If not, why not?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 018  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
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18. Would the company agree to strict limits and/or caps on ratepayer costs?

If not, why not?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 019  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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19. Would the company agree to allow ratepayers to opt-out of smart meter deployment? If not, why not?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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20. Can the company quantify measureable and significant benefits that the ratepayers will realize, including a monetary quantification of net savings (if any) to ratepayers?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 021  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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21. Please explain in detail what detriments, if any, the company expects its ratepayers to realize because of Smart Grid? Include in the explanation both new costs as well as stranded costs.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 022  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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22. What are the company's estimated costs which the company expects the ratepayers to realize?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 023  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
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23. What are the company's estimated costs which the company expects its shareholders, if any, to realize? Include in the explanation both new costs as well as stranded costs.

**Response:** Not applicable. Columbia is a natural gas distribution utility.



**COLUMBIA GAS OF KENTUCKY, INC.  
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24. What are the company's estimated costs which the company expects its shareholders, if any, to realize? Include in the explanation both new costs as well as stranded costs.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 025  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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25. Does the company agree that its ratepayers' benefits, whether financial or otherwise, may differ from one utility to another upon implementation of any Smart Grid technology? If not, why not?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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26. Can the company guarantee that the deployment of Smart Grid will not interfere with the regulatory compact whereby the ratepayers will receive safe, adequate and reliable service at fair, just and reasonable costs? If not, why not? Explain in detail.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
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27. Answer the above question with the definition of "fair, just and reasonable costs" as being economically feasible for the end-user.

- a. Provide any cost-benefit analysis that the company has run or will run to make the determination of economically feasible to the end-user.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
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28. Regarding time of use (TOU) rates, can the company confirm that low-income ratepayers will not be disproportionately affected more than non-low-income customers? If not, why not? (Provide in the answers in any studies, reports, analyses and relevant data.)

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
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29. With regard to TOU rates, does the company have any history with any such programs? If so, explain in detail with particular facts as to:
- a. the number of customers who participated;
  - b. whether they remained on the program;
  - c. whether they saved money on their bills; and
  - d. whether the customers ultimately reduced their usage.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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DATED FEBRUARY 27, 2013**

30. With regard to TOU rates, does the company have any history with any such programs? If so, explain in detail with particular facts as to:

- a. the number of customers who participated;
- b. whether they remained on the program;
- c. whether they saved money on their bills; and
- d. whether the customers ultimately reduced their usage.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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31. Assume: Full deployment of Smart Grid at the residential ratepayer level consisting of a household with only Energy Star appliances, an HVAC system with at least a 15 SEERS rating, etc. and any smart grid apparatuses/equipment for interconnectivity with the electricity provider (including generation, transmission and distribution).
- a. Does the company agree that if full deployment of the magnitude described in the above question occurs, the average residential ratepayer could experience a significant capital outlay?
  - b. If so, what are the projected costs?
  - c. If no costs are anticipated by the electric provider, why not?

**Response:** Not applicable. Columbia is a natural gas distribution utility.



**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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32. In regard to appliances, such as refrigerators or lighting, does the company agree that in the long run, it is cheaper for the end-user himself/herself to make that capital outlay for the purchase of the appliance or lighting than have the company provide the appliance(s) and build the costs into the company's ratebase which would then include a profit component for the company on an-going basis?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
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33. Confirm that the Smart Grid depends, at least in part, if not exclusively, on telephony (whether landline, fiber optic, wireless or VOIP) at the end-user level for the end-user to participate in his/her altering his/her electricity usage patterns or behavior.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 034  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
DATED FEBRUARY 27, 2013**

34. If the answer to the above question is in the affirmative, confirm that limited access or even complete absence of access to telephony will interfere with, if not prevent, the deployment of the Smart Grid at the end-user level.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 035  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
DATED FEBRUARY 27, 2013**

35. If the company intends to install infrastructure / software allowing for the transmission of Smart Grid / Smart Meter data over its distribution / transmission conductors and networks, provide estimates, or actual numbers, for the costs of doing so.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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36. Is there a standard communications' protocol that the company will deploy in its Smart Grid that will be interoperable regardless of the communications provider?

a. If not, explain how the company plans on addressing any problems that might arise.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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37. If improved reliability is the goal of Smart Grid / Smart Meter, would it not be more cost-effective to invest in infrastructure hardening (for example, utilizing protocols and standards developed and implemented by many utilities in hurricane-prone regions)?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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38. Describe the company's plans to avoid obsolescence of Smart Grid / Smart Meter infrastructure (both hardware and software) and any resulting stranded costs. (This question and the subparts should be construed to relate to both the Smart Grid Investment Standard as well as the Smart Grid Information Standard.)

a. Describe who would pay for stranded costs resulting from obsolescence.

b. With regard to the recovery of any obsolete investment, explain the financial accounting that should be used (as in account entry, consideration of depreciation, time period involved, etc.).

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 039  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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39. With regard to interoperability standards, does the company agree that Smart Grid equipment and technologies as they currently exist, and are certain to evolve in the future, are not a one size fits all approach to the Commonwealth?

**Response:** Not applicable. Columbia is a natural gas distribution utility.



**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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40. Is dynamic pricing strictly defined as TOU?
- a. If not, explain why not.
  - b. Is the company requesting that dynamic pricing be voluntary or involuntary, if at all?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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41. Please explain in detail whether the company has any dynamic programs in place in Kentucky.

- a. For each program, provide the number of participants.
- b. For each program, state whether those participants on aggregate have saved costs on their bills.
- c. For each program, state whether those participants on aggregate have saved costs on their bills.
- d. For each program, state whether each participant has saved costs on his/her/its bills. (The question is not intended to request any private identifier information.)

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 042  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
INITIAL REQUESTS FOR INFORMATION  
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42. Does the company recommend the Commission to formally adopt the EISA 2007 Smart Grid Investment Standard? If not, why not?

**Response:** No. Please refer to the Joint Brief filed January 13, 2012 in Case No. 2008-00408, stating that formal adoption is not necessary to achieve the Commission's goals of promoting increased energy efficiency and Smart Grid development.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 043  
Respondent: Judy M. Cooper

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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43. Does the company recommend the Commission to formally adopt the EISA 2007 Smart Grid Information Standard? If not, why not?

**Response:** No, please refer to Response to AG No. 42.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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44. Does the company recommend issuing an IRP Standard?
- a. If so, what concerns does the company have with a standard, including "priority resource," especially as it relates to cost-effectiveness?
  - b. What concerns would the company have with a standard as it affects CPCN and rate applications?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 045  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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45. Does the company agree that any investment in grid modernization infrastructure should be done before deploying TOU rates or dynamic pricing? If not, why not?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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46. Regarding the Kentucky Smart Grid Roadmap Initiative (KSGRI), does the company believe that it provides the fundamental basis for the Commonwealth as a **whole** to proceed with Smart Grid given its lack of incorporating all electric utilities such as municipalities and the TVA, along with its distribution companies? If yes, please explain why. If not, please explain why not.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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47. Does the company believe that the Commonwealth's electric industry is, or will become, so interconnected that all electric entities in any way involved or associated with the generation, transmission and / or distribution of electricity should be included and participate to some degree with Smart Grid if it is to come to fruition? If yes, please explain why. If not, please explain why not.

**Response:** Not applicable. Columbia is a natural gas distribution utility.



KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 048  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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48. Does the company believe that any Smart Grid Investment will trigger a CPCN case? If not, why not?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 049  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO ATTORNEY GENERAL'S  
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49. Does the company believe that Dynamic Pricing should be economically feasible for the end-user and be supported by a cost-benefit analysis?

**Response:** Not applicable. Columbia is a natural gas distribution utility.

KYPSC Case No. 2012-00428  
Response to Attorney General's Data Request No. 050  
Respondent: Brooke E. Leslie

**COLUMBIA GAS OF KENTUCKY, INC.  
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50. If additional education is contemplated with the deployment of the Smart Grid, please explain in detail if known or contemplated.

**Response:** Not applicable. Columbia is a natural gas distribution utility.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing responses to the Attorney General's Initial Request for Information of Columbia Gas of Kentucky, Inc., was served upon all parties of record by regular U. S. mail this 20<sup>th</sup> day of March, 2013.

*Brooke E. Leslie (gmc)*

Brooke E. Leslie  
Attorney for  
**COLUMBIA GAS OF KENTUCKY INC.**

## SERVICE LIST

Allen Anderson  
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