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PUBLIC SERVICE  
COMMISSION

Lexington-Fayette Urban County Government  
DEPARTMENT OF LAW

Jim Gray  
Mayor

Janet M. Graham  
Commissioner

July 17, 2013

Mr. Jeff Derouen  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

Re: Case No. 2013-00167  
(Columbia Gas of Kentucky, Inc.)

Dear Mr. Derouen:

Please find enclosed herewith for filing an original and ten (10) copies of Lexington-Fayette Urban County Government's Request for Information in the referenced matter.

Yours truly,

David J. Barberie  
Managing Attorney

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PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF )  
KENTUCKY, INC. FOR AN ADJUSTMENT OF ) CASE NO. 2013-00167  
RATES FOR GAS SERVICE )

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT’S REQUEST 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 July 16, 2013, and submits its Request 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 Request for Information.

Respectfully submitted,

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

BY:



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Attorney

**FILING NOTICE AND CERTIFICATE**

I hereby certify that an original and ten (10) copies of this Requests for Information were served and filed by first class U.S. Mail delivery, postage prepaid, to Jeff Derouen, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served on the following by mailing a copy by first class U.S. Mail delivery, postage prepaid, on July 17, 2013:

Honorable Stephen B. Seiple  
Attorney at Law  
Columbia Gas of Kentucky, Inc.  
200 Civic Center Drive  
Suite 1510  
P.O. Box 117  
Columbus, Ohio 43216-0117

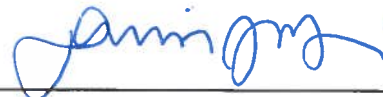
Honorable David F Boehm  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Cincinnati, Ohio 45202

Brooke E Leslie  
Columbia Gas of Kentucky, Inc.  
200 Civic Center Drive  
P.O. Box 117  
Columbus, Ohio 43216-0117

Honorable Dennis G Howard II  
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Office of the Attorney General Utility  
1024 Capital Center Drive  
Suite 200  
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Richard S Taylor  
225 Capital Avenue  
Frankfort, Kentucky 40601

Honorable Iris G Skidmore  
415 W. Main Street  
Suite 2  
Frankfort, Kentucky 40601



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ATTORNEY FOR LEXINGTON-FAYETTE

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT'S REQUEST 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. What percentage of the proposed additional annual revenues is attributable to Fayette County customers?

4. 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.

5. 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 usage and billing data. Please also provide a detailed explanation of the formula that was used to obtain this information.

6. 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.

7. 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.

8. 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 natural gas, 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?

9. 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?

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

11. 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?

12. 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?

13. 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.

14. 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.

15. 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.

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

17. Columbia is forecasting significant investment in automated meter reading. Is Columbia willing to allow Major Account customers to integrate daily AMR readings into their building automation systems?

18. Does Columbia anticipate labor savings due to automated meter reading? Please quantify.

19. Referencing filing requirement 12-d, approximately what percentage of plant revenue comes from Fayette County (for 12 months preceding)?

20. Please explain in detail whether the proposed Revenue Normalization Adjustment alleviates some of the risk placed upon Columbia.