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PUBLIC SERVICE
COMMISSION

Columbia Gas of Kentucky, Inc.

Case No. 2017-00115

Response to Staff's Second Request for
Information

Dated April 24, 2017

290 W. Nationwide Blvd.
Columbus, Ohio 43215
Direct: 614.460.5558
bwanchek@nisource.com



May 8, 2017

HAND DELIVERED

Dr. Talina R. Mathews
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

RE: *Case No. 2017-00115, Tariff Filing of Columbia Gas of Kentucky, Inc. to
Extend Its Small Volume Gas Transportation Service*

Dear Dr. Mathews,

Enclosed please find the original and eight (8) copies of Columbia Gas of Kentucky Inc.'s Responses to Commission Staff's Second Request for Information in the above referenced matter.

Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Brooke E. Wanchek (gme)".

Brooke E. Wanchek
Assistant General Counsel

Enclosure(s)

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2017 an original and eight (8) copies of the foregoing were served and filed by hand-delivery to Dr. Talina Mathews, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky, 40601. I further certify that true and accurate copies of the foregoing were delivered electronically to the parties as below:

Attorney General

Kent A. Chandler – kent.chandler@ky.gov

Rebecca W. Goodman – rebecca.goodman@ky.gov

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Brooke E. Wanchuck (gme)

Brooke E. Wanchuck

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:)
)
TARIFF FILING OF COLUMBIA GAS OF) Case No. 2017-00115
KENTUCKY, INC. TO EXTEND ITS SMALL)
VOLUME GAS TRANSPORTATION SERVICE)

CERTIFICATION OF RESPONSES TO INFORMATION REQUESTS

This is to certify that I have supervised the preparation of Columbia Gas of Kentucky, Inc.'s responses to the Commission Staff's Second Request for Information dated April 24, 2017 and that the responses are true and accurate to the best of my knowledge, information and belief formed after reasonable inquiry.

DATE: 5/8/2017

Herbert A. Miller, Jr.
Herbert A. Miller, Jr.
President
Columbia Gas of Kentucky, Inc.

COMMONWEALTH OF KENTUCKY

COUNTY OF FAYETTE

SUBSCRIBED AND SWORN to before me by Herbert A. Miller, Jr. on this the

8th day of May, 2017.

Evelyn Long Hearn
Notary Public

My Commission expires: 05/15/2018

#510207

KY PSC Case No. 2017-00115
Staff's Data Request Set Two No. 1
Respondent: Judy M. Cooper

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED APRIL 24, 2017

1. Refer to Columbia's Small Volume Gas Transportation Service tariff.

a. Refer to the Availability section. Confirm that Columbia has only one IUS customer. If this is not correct, state how many customers are served pursuant to the IUS rate schedule.

b. Explain whether Columbia's IUS customer(s) are aware of the availability of the Choice program, and whether they have expressed any interest in participating in the program.

Response:

a. Columbia has two IUS customers.

b. Columbia is not aware of any interest by IUS customers in participation in the CHOICE program.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED APRIL 24, 2017

2. Refer to Columbia's Small Volume Aggregation Service tariff and to Columbia's response to the Attorney General's First Request for Information ("AG's First Request"), Item 14.

a. Refer to the Marketer Certification section. State whether any marketer has violated the Code of Conduct since November 2013, and if so, describe the action taken by Columbia to address each violation.

b. Refer to the Marketer Charge section. Explain whether the \$.05 per Mcf charge for all volumes delivered to the marketers' aggregation pools has been sufficient to cover Columbia's cost of administering the Choice program since November 2013.

The explanation should include the amount collected through the Marketer Charge, and the corresponding Choice program costs which were defrayed by the charges.

c. Refer to the Daily Delivery Requirement section. State whether Columbia has experienced any significant failure of marketers to meet their daily delivery requirements, and if so, whether it has caused gas supply or operational problems for Columbia.

d. Refer to the Billing section. Explain whether the \$.20 monthly charge per account has been sufficient to cover Columbia's cost of billing for the Choice program since November 2013. The explanation should include the amount collected through the Marketer Charge, and the corresponding Choice program-specific billing costs which were defrayed by the charges.

e. Refer to the Payment to Marketer section.

i. Explain whether the 2 percent withheld from marketers' monthly revenues has been sufficient to cover Columbia's cost of administering the collection process for the Choice program since November 2013. The explanation should include the amount collected through the two percent withheld revenue, and the corresponding Choice program collections costs and uncollectible account expense which were defrayed by the withheld revenues.

ii. Explain whether the uncollectible gas cost of Choice program customers is collected through Columbia's Gas Cost Adjustment mechanism.

f. Refer to the Standards of Conduct section paragraph 12. State whether Columbia has received any complaints since November 2013 from marketers concerning its compliance with the Standards of Conduct. If so, provide the basis of the complaints, and a discussion of their ultimate disposition.

Response:

a. Columbia has had three Code of Conduct violations concerning three different Marketers since November 2013. All three violations were the result of the Marketer's solicitation methods. A description of each instance and action taken by Columbia is outlined below.

11/13/2014 - The first instance was a result of several complaints from customers regarding aggressive and misleading sales tactics used during a door to door campaign. Columbia received complaints that the sales representatives were using aggressive sales tactics by asking the customer to provide their Columbia Gas bill and provide cash donations for veterans. There were also instances where the sales representatives misled the customers regarding Columbia's current gas cost rate. Columbia immediately suspended the Marketer's door to door campaign and worked with the Marketer to address the complaints and set clear expectations and guidelines for any future door to door campaigns. They have been advised that any additional complaints could result in termination from the CHOICE program and all future marketing campaigns must be approved by Columbia prior to beginning the campaign.

11/20/2014 - The second instance was a result of a complaint Columbia received from another LDC in Kentucky. The utility reported an influx of calls and complaints regarding a mailing that was sent by the Marketer soliciting their customers for Columbia's CHOICE program. The Marketer in this instance used a solicitation list not provided by Columbia, and solicited customers outside of Columbia's territory.

Columbia worked with the Marketer to provide a customer solicitation list of eligible Columbia customers and prevent additional confusion.

08/30/2016 - The third instance also resulted from a series of complaints Columbia received from our customers regarding aggressive and misleading sales tactics used during a door to door campaign. Columbia received complaints that the sales representatives were overly aggressive and attempted to pressure the customers into providing their account numbers, even after stating they did not want to participate in the program. At one point, several customers contacted their local police department to report the activity and it was determined the representatives were soliciting without the required city permit. As in the instances above, Columbia worked with the Marketer to address the complaints and set clear expectations and guidelines for any future door to door campaign. They have been advised that any additional complaints could result in termination from the CHOICE program and all future marketing campaigns must be approved by Columbia prior to beginning the campaign.

b. The amount collected for the Mcf Marketer Charge since November 2013 is as follows:

Mcf Marketer Charge	
Nov - Dec 2013	44,022.45
Jan - Dec 2014	217,771.73
Jan - Dec 2015	188,191.10
Jan - Dec 2016	<u>154,613.78</u>
Total	604,599.06

The Marketer Charge was created due to the belief that marketers should make some contribution to the establishment of the CHOICE program. The \$0.05 per Mcf charge was not created based upon cost of service. The cost of serving a tariff sales customer and a CHOICE participant are substantially the same. Originally, the revenues from the marketer charge were identified for customer education. However, in rate cases subsequent to the creation of the CHOICE program, the revenues from the marketer charge contribute to the recovery of the overall revenue requirement. The charge has been retained with the idea that it protects non-CHOICE customers from having to bear the costs of items such as CHOICE customer surveys, and any other CHOICE customer-specific activity that may arise from time to time.

c. Columbia has not experienced what Columbia would define as a significant failure by a Marketer to meet their daily delivery requirements that caused gas supply or operational problems since November 2013.

d. The amount collected for the Marketer Billing Charge since November 2013 is as follows:

Marketer Billing Charge	
Nov - Dec 2013	15,660.35
Jan - Dec 2014	76,360.60
Jan - Dec 2015	66,874.60
Jan - Dec 2016	<u>61,409.30</u>
Total	220,304.85

The Marketer Billing Charge was established in recognition that billing of customers would be a normal business expense of a marketer. Since a foundation of Columbia's program was that the customer would only receive one bill, the marketer would not have to incur the cost of preparing and remitting a bill. The rate of \$0.20 per bill was identified as less than the cost of a stamp that would be required for sending a separate bill and, therefore, less costly than establishing a billing processing and remittance process. Some ongoing expense of technology maintenance was anticipated although expected to be less than the initial expense to enable Columbia to add the marketer billing to the customer bill. The billing charge was approved in recognition of the preceding ideas and so that no incremental costs were borne by customers that chose to remain sales service customers. Originally, these revenues were incremental to Columbia's revenues. However, in rate cases subsequent to the creation of the CHOICE program, the revenues from the billing charge contribute to the recovery of the overall revenue requirement.

e. i. The amount collected through the two percent withheld revenue since November 2013 is as follows:

Net Gain on Purchase of A/R	
Nov - Dec 2013	115,457.43
Jan - Dec 2014	533,952.65
Jan - Dec 2015	447,087.92
Jan - Dec 2016	<u>352,825.93</u>
Total	1,449,323.93

These amounts are net of uncollectible accounts expense.

As with the Marketer Billing Charge, credit and collections would be a normal expense of a marketer in the absence of the foundation that a customer would only receive one bill. The basis for withholding two percent from the payment to marketers is to recognize that Columbia assumes the risk associated with the collection of the revenues. The percentage was deemed to be cheaper than if the marketer maintained its own credit and collections department and on the low side of other private commercial enterprises. The collection risk is entirely on Columbia.

- ii. The uncollectible gas cost of CHOICE program customers is not collected through Columbia's Gas Cost Adjustment mechanism.
- f. Columbia has not received any complaints since November 2013 from Marketers concerning Columbia's compliance with the Standards of Conduct for Marketing Affiliates and Internal Merchant Operations.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED APRIL 24, 2017

3. Refer to Columbia's response to Commission Staff's First Request for Information, Item 3. State the estimated cost to Columbia to add information to customer bills directing customers to information concerning the Choice program, and to mail an annual notification to Choice customers.

Response:

A recurring bill message on CHOICE customer bills is estimated to cost approximately \$9,000.

A mailing – at current postage rates – to 20,000 CHOICE customers is estimated to cost \$9,276.27 annually. This amount will vary depending on the number of customers enrolled in the CHOICE program at the time of the mailing.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED APRIL 24, 2017

4. Refer to Columbia's response to the AG's First Request, Item 11.
 - a. For each year since the Choice program was first approved, provide a summary of aggregate gas price differences between Choice gas marketers and the price of Columbia's gas.
 - b. For each year since the Choice program was first approved, provide the summary of aggregate gas price differences requested in part a. above, broken down between General Service — Residential and General Service — Other customers.
 - c. Provide any analysis Columbia has performed comparing its quarterly gas cost rates and the rates of participating marketers.

Response:

- a. Please see the following table.

month	volumes	mktr. Revenue	at CKY rate (volume * CKY rate)	SVGTS - ACA	savings	CKY rate (total GCA)	calendar year savings
Nov. 2000	5,965.4	38,022.94	40,792.60	0	2,769.66	\$ 6.8382	
Dec.	413,238.6	2,705,474.55	3,169,788.01	0	464,313.46	\$ 7.6706	467,083.11
Jan. 2001	475,114.0	3,245,916.60	3,644,409.45	0	398,492.85	\$ 7.6706	
Feb.	387,879.5	2,710,917.37	2,975,268.49	0	264,351.12	\$ 7.6706	
Mar.	567,791.9	4,246,474.82	5,052,325.88	0	805,851.06	\$ 8.8982	
Apr.	495,404.4	3,894,758.57	4,137,568.01	0	242,809.44	\$ 8.3519	
May	209,775.9	1,599,681.34	1,875,438.50	0	275,757.16	\$ 8.9402	
June	150,557.3	1,207,524.51	1,344,446.58	0	136,922.07	\$ 8.9298	
July	115,470.2	874,152.88	904,628.19	0	30,475.31	\$ 7.8343	
Aug.	121,254.3	832,244.50	865,440.44	0.00	33,195.94	\$ 7.1374	
Sept.	99,342.1	586,251.53	736,442.86	126,527.99	23,663.34	\$ 7.4132	
Oct.	204,554.3	1,249,159.76	1,516,401.94	224,577.89	42,664.29	\$ 7.4132	
Nov.	398,956.4	2,427,201.24	2,957,543.58	435,870.83	94,471.51	\$ 7.4132	
Dec.	637,234.2	3,662,252.26	3,912,299.37	514,234.48	(264,187.37)	\$ 6.1395	\$2,084,467
Jan. 2002	1,314,839.6	7,533,948.28	8,072,457.72	1,082,031.82	(543,522.38)	\$ 6.1395	
Feb.	1,063,922.4	6,074,180.00	6,531,951.57	820,390.38	(362,618.81)	\$ 6.1395	
Mar.	1,011,817.0	5,664,969.01	5,507,623.48	626,421.25	(783,766.78)	\$ 5.4433	
Apr.	693,661.0	3,822,182.10	3,775,804.92	296,084.16	(342,461.34)	\$ 5.4433	
May	314,334.5	1,729,484.28	1,711,016.98	123,042.31	(141,509.61)	\$ 5.4433	
June	210,736.8	1,156,988.04	1,271,859.81	66,683.07	48,188.70	\$ 6.0353	
July	128,966.8	707,446.96	778,353.33	38,432.65	32,473.72	\$ 6.0353	
Aug.	120,373.7	659,970.34	726,491.39	39,137.21	27,383.84	\$ 6.0353	
Sept.	118,547.9	638,450.21	566,848.64	4,542.17	(76,143.74)	\$ 4.7816	
Oct.	171,248.4	932,127.16	818,841.35	13,432.49	(126,718.30)	\$ 4.7816	
Nov.	486,488.8	2,659,964.05	2,326,194.85	26,411.57	(360,180.77)	\$ 4.7816	
Dec.	1,025,127.2	5,811,897.09	5,851,426.06	13,532.95	25,998.02	\$ 5.7080	(\$2,602,879)
Jan. 2003	1,262,724.6	7,410,303.90	7,207,632.02	24,477.45	(227,149.33)	\$ 5.7080	
Feb.	1,386,817.5	8,343,783.91	7,915,954.29	21,070.54	(448,900.16)	\$ 5.7080	
Mar.	1,058,954.3	6,775,676.42	8,015,754.57	22,662.04	1,217,416.11	\$ 7.5695	
Apr.	506,808.3	3,418,065.29	4,840,931.52	13,048.82	1,409,817.41	\$ 9.5518	
May	265,721.2	1,860,707.93	2,538,115.76	5,439.80	671,968.03	\$ 9.5518	
June	178,104.8	1,201,006.07	1,443,842.18	5,190.94	237,645.17	\$ 8.1067	
July	135,570.7	920,432.80	1,099,030.99	10,451.04	168,147.15	\$ 8.1067	
Aug.	122,793.1	825,617.91	995,446.82	6,545.45	163,283.46	\$ 8.1067	
Sept.	127,729.1	847,379.71	1,245,473.68	39,618.85	358,475.12	\$ 9.7509	
Oct.	225,626.9	1,586,946.67	2,200,065.34	79,939.16	533,179.51	\$ 9.7509	
Nov.	356,891.1	2,715,969.91	3,480,009.43	146,213.66	617,825.86	\$ 9.7509	
Dec.	845,282.5	6,730,966.36	8,330,512.62	328,261.83	1,271,284.43	\$ 9.8553	\$5,972,993
Jan. 2004	1,281,148.3	10,557,811.44	12,626,100.84	421,197.74	1,647,091.66	\$ 9.8553	
Feb.	1,316,786.9	10,736,348.36	12,977,329.94	429,288.52	1,811,693.06	\$ 9.8553	
Mar.	915,528.3	7,533,219.64	9,100,992.17	248,804.37	1,318,968.16	\$ 9.9407	
Apr.	630,014.7	5,260,238.83	6,262,787.13	154,115.56	848,432.74	\$ 9.9407	
May	305,573.3	2,447,467.17	3,037,612.50	75,854.97	514,290.36	\$ 9.9407	
June	171,001.7	421,588.32	1,609,468.00	32,736.13	1,155,143.55	\$ 9.4120	
July	125,008.5	1,028,353.78	1,176,580.00	15,924.38	132,301.84	\$ 9.4120	
Aug.	116,143.1	957,581.38	1,093,138.86	16,201.48	119,356.00	\$ 9.4120	
Sept.	115,300.8	920,159.07	947,253.72	694.84	26,399.81	\$ 8.2155	
Oct.	167,958.7	1,358,051.37	1,379,864.70	1,334.49	20,478.84	\$ 8.2155	
Nov.	257,059.9	2,067,949.17	2,111,875.61	1,122.53	42,803.91	\$ 8.2155	
Dec.	708,767.4	6,258,863.03	7,215,181.26	2,180.24	954,137.99	\$ 10.1799	\$8,591,098
Jan. 2005	964,488.0	9,039,948.69	9,818,391.39	2,473.10	775,969.60	\$ 10.1799	
Feb.	1,013,269.2	9,483,108.85	10,314,979.13	1,793.52	830,076.76	\$ 10.1799	
Mar.	875,457.9	8,088,145.90	7,983,213.04	3,852.26	(108,785.12)	\$ 9.1189	
April	532,677.4	4,693,548.01	4,857,431.94	2,272.97	161,610.96	\$ 9.1189	
May	300,115.1	2,645,246.78	2,736,719.59	1,293.86	90,178.95	\$ 9.1189	
June	145,223.4	1,379,455.25	1,419,892.75	551.88	39,885.62	\$ 9.7773	
July	112,641.6	1,079,080.94	1,101,330.72	939.88	21,309.90	\$ 9.7773	
August	97,301.7	938,518.93	951,347.91	765.34	12,063.64	\$ 9.7773	
September	101,087.8	992,789.58	960,538.69	(2,322.83)	(39,928.06)	\$ 9.4031	
October	90,260.9	907,211.77	848,732.27	(2,322.83)	(56,156.67)	\$ 9.4031	
November	233,695.7	3,537,786.65	2,876,069.61	(4,734.46)	(656,982.58)	\$ 12.3069	
December	574,401.8	8,570,224.10	8,408,897.71	(8,445.75)	(152,880.64)	\$ 14.6394	916,362.36
January 2006	677,725.0	10,332,586.90	9,921,487.37	(8,575.99)	(402,523.55)	\$ 14.6394	
February	588,443.6	8,659,242.01	6,837,891.17	(10,727.26)	(1,810,623.59)	\$ 11.6203	
March	564,567.0	8,117,252.44	6,233,384.25	(19,655.14)	(1,864,213.05)	\$ 11.0410	
April	356,517.1	5,134,463.01	3,936,305.30	(17,685.57)	(1,180,472.14)	\$ 11.0410	
May	160,033.1	1,987,327.24	1,766,925.46	(8,321.17)	(212,080.61)	\$ 11.0410	
June	78,356.1	928,719.09	784,133.00	(3,670.92)	(140,915.17)	\$ 10.0073	
July	74,460.7	918,766.14	745,150.56	(3,612.83)	(170,002.75)	\$ 10.0073	
August	90,047.4	1,103,199.39	901,131.35	(2,720.67)	(199,347.37)	\$ 10.0073	
September	72,683.2	886,281.87	608,140.33	(7,072.18)	(271,059.36)	\$ 8.3670	
October	120,619.4	1,435,140.70	1,009,222.52	(26,863.00)	(399,055.18)	\$ 8.3670	
November	283,657.5	3,412,659.08	2,373,362.30	(65,518.08)	(973,778.70)	\$ 8.3670	
December	454,371.9	5,592,797.63	3,832,808.73	(106,169.99)	(1,653,818.91)	\$ 8.4354	(9,277,900.37)

January 2007	503,657.8	6,210,728.47	4,248,555.01	(117,212.30)	(1,844,961.16)	\$ 8.4354	
February	760,950.5	9,290,478.95	6,418,921.85	(100,035.90)	(2,771,521.20)	\$ 8.4354	
March	612,867.4	7,418,580.30	3,875,405.72	(120,126.77)	(3,423,047.81)	\$ 6.3234	
April	301,047.5	3,608,847.26	1,903,643.76	(47,486.42)	(1,657,717.08)	\$ 6.3234	
May	171,776.2	1,797,465.67	1,086,209.62	(35,729.44)	(675,526.61)	\$ 6.3234	
June	83,735.9	875,137.60	599,406.69	(18,317.79)	(257,413.12)	\$ 7.1583	
July	73,578.4	771,811.03	526,696.26	(13,670.64)	(231,444.13)	\$ 7.1583	
August	70,917.8	734,009.22	507,650.89	(13,106.18)	(213,252.15)	\$ 7.1583	
September	54,145.6	515,280.74	551,916.93	2,010.30	34,625.89	\$ 10.1932	
October	75,171.6	719,862.46	766,239.15	3,457.19	42,919.50	\$ 10.1932	
November	208,898.8	2,024,219.21	2,129,347.25	10,647.46	94,480.58	\$ 10.1932	
December	449,687.2	4,660,839.91	4,761,782.73	19,847.56	81,095.26	\$ 10.5891	(10,821,762.03)
January 2008	623,319.9	6,428,588.76	6,600,396.75	26,508.83	145,299.16	\$ 10.5891	
February	666,267.7	6,835,127.98	7,055,175.30	43,145.66	176,901.66	\$ 10.5891	
March	583,275.1	6,329,090.89	6,221,970.47	10,714.08	(117,834.50)	\$ 10.6673	
April	348,505.8	3,834,776.66	3,717,615.92	7,851.39	(125,012.13)	\$ 10.6673	
May	164,183.4	1,848,860.05	1,751,393.58	2,768.23	(100,234.70)	\$ 10.6673	
June	100,830.0	1,169,794.98	1,376,410.16	1,591.23	205,023.95	\$ 13.6508	
July	68,494.6	960,228.79	935,006.09	1,230.13	(26,452.83)	\$ 13.6508	
August	59,012.3	804,652.10	805,565.10	1,333.25	(420.25)	\$ 13.6508	
September	56,765.1	735,337.22	807,557.34	4,179.71	68,040.41	\$ 14.2263	
October	78,633.7	1,042,235.94	1,118,666.61	8,832.36	67,598.31	\$ 14.2263	
November	247,995.8	3,398,177.87	3,528,062.65	26,078.11	103,806.67	\$ 14.2263	
December	603,801.1	7,963,454.78	8,011,655.66	73,733.05	(25,532.17)	\$ 13.2687	371,183.59
January 2009	742,894.6	9,395,421.17	9,857,245.58	102,546.30	359,278.11	\$ 13.2687	
February	766,329.2	9,393,907.18	10,168,192.26	96,416.81	677,868.27	\$ 13.2687	
March	558,580.9	6,051,206.89	5,653,976.85	156,008.14	(553,238.18)	\$ 10.1224	
April	364,851.7	3,734,368.09	3,693,174.85	111,663.46	(152,856.70)	\$ 10.1224	
May	185,273.4	1,879,272.35	1,875,411.46	68,606.00	(72,466.89)	\$ 10.1224	
June	107,411.4	943,400.78	849,269.72	48,955.23	(143,086.29)	\$ 7.9067	
July	126,676.2	1,111,699.66	1,001,590.71	45,980.18	(156,089.13)	\$ 7.9067	
August	39,474.6	337,183.09	312,113.82	33,288.30	(58,357.57)	\$ 7.9067	
September	62,452.9	478,278.86	225,561.14	(57,371.96)	(195,345.76)	\$ 3.6117	
October	132,410.3	1,115,790.90	478,226.28	(80,488.14)	(557,076.48)	\$ 3.6117	
November	274,166.2	2,512,981.36	1,009,891.20	(133,185.08)	(1,369,905.08)	\$ 3.6835	
December	514,442.2	4,644,610.83	2,247,495.08	(227,737.37)	(2,169,378.38)	\$ 4.3688	(4,390,654.08)
January 2010	895,433.0	7,976,523.91	3,911,967.73	(332,500.75)	(3,732,055.43)	\$ 4.3688	
February	810,094.7	7,270,698.31	3,539,141.73	(270,658.02)	(3,460,898.56)	\$ 4.3688	
March	676,430.6	5,878,737.85	4,358,558.23	(126,994.49)	(1,413,185.13)	\$ 6.4139	
April	275,977.5	2,378,993.59	1,770,092.09	(46,765.99)	(562,135.52)	\$ 6.4139	
May	138,398.0	1,082,738.96	887,670.93	(21,024.22)	(174,043.81)	\$ 6.4139	
June	90,030.1	697,369.30	397,653.95	(16,576.60)	(283,138.75)	\$ 4.4169	
July	81,456.6	662,177.50	359,785.66	(18,578.99)	(283,812.85)	\$ 4.4169	
August	68,697.8	553,543.56	303,431.31	(19,786.24)	(230,326.01)	\$ 4.4169	
September	80,407.8	644,753.12	559,268.41	(326.85)	(85,157.86)	\$ 6.9554	
October	103,477.0	826,347.94	719,723.93	(739.96)	(105,884.05)	\$ 6.9554	
November	225,533.7	1,742,963.19	1,568,677.10	(1,012.67)	(173,273.42)	\$ 6.9554	
December	653,790.5	5,025,633.04	4,575,291.30	(2,771.24)	(447,570.50)	\$ 6.9981	(10,951,481.90)
January 2011	997,102.9	7,808,056.64	6,977,825.80	(4,817.75)	(825,413.09)	\$ 6.9981	
February	848,505.8	6,646,555.95	5,937,928.44	(4,255.34)	(704,372.17)	\$ 6.9981	
March	540,303.6	4,191,066.19	3,177,687.56	(94,977.79)	(918,400.84)	\$ 5.8813	
April	381,415.0	2,653,186.40	2,243,216.04	(68,435.46)	(341,534.90)	\$ 5.8813	
May	196,739.4	1,435,963.20	1,157,083.43	(34,485.48)	(244,394.29)	\$ 5.8813	
June	106,655.4	786,405.19	581,815.87	(18,363.21)	(186,226.11)	\$ 5.4551	
July	90,382.0	693,470.90	493,042.85	(9,320.96)	(191,107.09)	\$ 5.4551	
August	61,421.5	451,224.36	335,060.42	(7,649.39)	(108,514.55)	\$ 5.4551	
September	85,854.1	635,456.35	484,371.66	(6,417.93)	(144,666.76)	\$ 5.6418	
October	122,390.4	925,622.68	690,502.16	(9,917.12)	(225,203.40)	\$ 5.6418	
November	271,211.9	2,051,249.02	1,530,123.30	(23,993.20)	(497,132.52)	\$ 5.6418	
December	471,428.1	3,536,420.50	2,569,188.86	(48,152.11)	(919,079.53)	\$ 5.4498	(5,306,045.24)
January 2012	696,261.6	5,033,190.82	3,794,486.47	(72,388.53)	(1,166,315.82)	\$ 5.4498	
February	644,111.9	4,559,343.74	3,510,281.03	(52,387.17)	(996,675.54)	\$ 5.4498	
March	473,183.2	3,303,951.22	2,673,910.94	(11,384.41)	(618,655.87)	\$ 5.6509	
April	202,587.1	1,381,195.64	1,144,799.44	(1,445.12)	(234,951.08)	\$ 5.6509	
May	157,450.0	1,036,439.38	889,734.21	(1,539.56)	(145,165.62)	\$ 5.6509	
June	100,075.3	644,686.58	372,580.34	(1,020.01)	(271,086.23)	\$ 3.7230	
July	77,278.5	479,045.60	287,707.86	(572.34)	(190,765.40)	\$ 3.7230	
August	75,014.7	470,490.04	279,279.73	(708.73)	(190,501.58)	\$ 3.7230	
September	91,842.2	568,710.85	325,663.26	(14,788.46)	(228,259.13)	\$ 3.5459	
October	118,164.1	741,937.38	418,998.08	(20,196.43)	(302,742.87)	\$ 3.5459	
November	307,659.6	2,035,036.57	1,090,930.18	(40,314.34)	(903,792.05)	\$ 3.5459	
December	486,548.8	3,217,612.96	2,061,312.65	(45,244.00)	(1,111,056.31)	\$ 4.2366	(6,359,967.50)
January 2013	723,800.9	4,807,695.74	3,066,454.89	(48,179.38)	(1,693,061.47)	\$ 4.2366	
February	718,213.5	4,747,938.50	3,042,783.31	(47,368.46)	(1,657,786.73)	\$ 4.2366	
March	651,065.9	4,283,858.43	2,684,800.45	(51,538.25)	(1,547,519.73)	\$ 4.1237	
April	481,350.0	\$3,165,285.36	1,984,943.00	(39,920.98)	(1,140,421.39)	\$ 4.1237	
May	179,376.0	\$1,187,631.87	739,692.81	(12,061.90)	(435,877.16)	\$ 4.1237	
June	100,355.0	\$683,924.74	515,363.07	(7,028.59)	(161,533.08)	\$ 5.1354	
July	84,345.0	\$575,137.34	433,145.31	(4,942.58)	(137,049.45)	\$ 5.1354	
August	74,441.0	\$492,004.19	382,284.31	(3,481.80)	(106,238.08)	\$ 5.1354	
September	79,232.0	\$506,125.24	528,659.67	2,302.66	20,231.77	\$ 6.6723	
October	103,950.0	\$669,891.86	693,585.59	2,666.67	21,037.05	\$ 6.6723	
November	273,613.0	\$1,910,224.65	1,825,628.02	7,997.51	(92,594.14)	\$ 6.6723	
December	606,836.0	\$4,197,229.01	3,952,140.82	23,134.22	(268,222.41)	\$ 6.5127	(7,199,034.80)

January 2014	833,931.8	5,797,964.67	5,399,374.83	39,410.24	(438,000.08)	\$	6.4746	
February	914,353.6	6,498,697.50	5,920,073.82	48,481.83	(627,105.51)	\$	6.4746	
March	701,378.2	5,289,116.75	3,984,599.69	(13,675.79)	(1,290,841.27)	\$	5.6811	
April	393,392.7	2,841,840.39	2,234,903.27	(7,093.52)	(599,843.60)	\$	5.6811	
May	170,243.9	1,221,950.03	967,172.62	(2,707.97)	(252,069.44)	\$	5.6811	
June	99,285.5	703,177.14	608,759.11	(1,940.44)	(92,477.59)	\$	6.1314	
July	75,784.4	531,498.18	464,664.47	(1,691.84)	(65,141.87)	\$	6.1314	
August	89,741.4	619,534.34	550,240.42	(1,797.83)	(67,496.09)	\$	6.1314	
September	70,606.9	489,942.19	486,509.78	4,226.00	(7,658.41)	\$	6.8904	
October	103,543.7	732,665.07	713,457.51	5,498.21	(24,705.77)	\$	6.8904	
November	286,288.8	2,018,359.52	1,972,644.35	12,576.93	(58,292.10)	\$	6.8904	
December	611,465.0	4,381,144.62	4,401,080.48	29,832.91	(9,897.05)	\$	7.1976	(3,533,528.77)
January 2015	754,208.0	5,395,169.05	5,428,487.50	31,360.41	1,958.04	\$	7.1976	
February	771,934.1	5,401,187.61	5,556,072.88	29,083.09	125,802.18	\$	7.1976	
March	751,846.2	5,089,643.99	4,918,352.29	47,209.69	(218,501.39)	\$	6.5417	
April	327,499.0	2,148,216.57	2,142,400.21	21,156.32	(26,972.68)	\$	6.5417	
May	154,880.2	972,658.48	1,013,179.80	10,317.24	30,204.08	\$	6.5417	
June	96,859.4	585,705.67	509,771.02	6,444.06	(82,378.71)	\$	5.2630	
July	79,940.6	487,649.23	420,727.38	6,185.94	(73,107.79)	\$	5.2630	
August	73,188.8	442,555.47	385,192.65	4,986.56	(62,349.38)	\$	5.2630	
September	78,532.9	476,994.29	213,530.96	(9,369.17)	(254,094.16)	\$	2.7190	
October	104,003.3	631,401.39	282,784.97	(12,524.45)	(336,091.97)	\$	2.7190	
November	199,444.2	1,184,269.80	542,288.78	(18,225.11)	(623,755.91)	\$	2.7190	
December	371,978.0	2,193,277.68	1,053,776.48	(24,514.05)	(1,114,987.15)	\$	2.8329	(2,634,274.84)
January 2016	581,622.1	3,436,688.93	1,647,677.25	(34,751.29)	(1,754,260.39)	\$	2.8329	
February	654,317.7	3,823,585.28	1,853,616.61	(34,145.60)	(1,935,823.07)	\$	2.8329	
March	443,851.3	2,583,170.31	987,613.53	(21,685.85)	(1,573,870.93)	\$	2.2251	
April	275,558.9	1,581,157.89	613,146.11	(15,080.27)	(952,931.51)	\$	2.2251	
May	142,227.0	802,802.74	316,469.30	(9,694.50)	(476,638.94)	\$	2.2251	
June	102,777.9	577,345.01	225,145.27	(6,741.59)	(345,458.16)	\$	2.1906	
July	74,708.8	418,859.70	163,657.10	(4,432.62)	(250,769.98)	\$	2.1906	
August	68,042.2	385,858.60	149,053.24	(3,423.46)	(233,381.90)	\$	2.1906	
September	69,666.6	395,871.26	313,736.57	(225.45)	(81,909.24)	\$	4.5034	
October	81,241.9	460,156.22	365,864.77	(180.27)	(94,111.18)	\$	4.5034	
November	155,550.1	900,565.70	700,504.32	(355.42)	(199,705.96)	\$	4.5034	
December	442,932.3	2,666,542.09	2,086,609.77	(4,808.90)	(575,123.42)	\$	4.7109	(8,473,984.69)

- b. The requested information is not available because Columbia does not retain all the revenues in the manner requested.
- c. Please see response to part a.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED APRIL 24, 2017

5. Refer to Columbia's response to the AG's First Request, Item 13.
Provide details concerning the marketer complaints, a breakdown of the subject matter of the complaints, whether any particular marketer(s) were the subject of repeated substantiated complaints, and the ultimate disposition of the complaints.

Response:

May 2015 - April 2016 - Total Marketer Complaints-12

Marketer B - 4 Complaints

Type-Cancellation

09/03/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding dispute of Marketer B's request that he pay an early termination fee of \$150 in order to be released from his current CHOICE marketer contract. Customer stated he did not enroll with Marketer B. Columbia Gas of Kentucky contacted Marketer B and requested information related to the

enrollment. Columbia reviewed the third party vendor verification recording from 02-23-2015 where the customer verbally accepted the terms of Marketer B's contract and was advised at that time of a possible early termination fee of \$150.00. Recording indicated customer's verification and acceptance of contract stipulations. Columbia Gas of Kentucky asked Marketer B to reach out to the customer and provide the recording information.

10/02/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding dispute of Marketer B's request that she pay an early termination fee of \$150 in order to be released from her current CHOICE marketer contract. Representative for the customer stated that customer is elderly and is hearing impaired therefore she did not understand the terms of her phone enrollment with Marketer B. Columbia Gas of Kentucky contacted Marketer B regarding the dispute and Marketer B agreed to release the customer from her contract without having to pay the \$150 early termination fee.

03/04/2016 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be released from their contract with Marketer B. Columbia Gas of Kentucky contacted Marketer B who provided information where their records reflect the customer contacted them in December 2015 about termination of their contract. However Marketer B offered a lower rate

during this phone conversation and the customer accepted. Marketer B's representative advised the customer that it may take up to 1-2 billing cycles for the new rate to take effect. Columbia's records indicate that the new rate did not take effect until the March 2016 billing cycle. Customer chose to remain with Marketer B rather than terminating their contract.

Type-Delayed Enrollment

02/17/2016 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be enrolled with a CHOICE Marketer, Marketer B. Columbia Gas of Kentucky contacted Marketer B to determine the delay in the customer's enrollment. Marketer B noted that they were unable to enroll the customer as the customer was already enrolled with another CHOICE marketer and had already advised the customer as such. The customer was advised they would need to contact their current marketer and cancel their contract before they could be enrolled with a new marketer. A customer can only be enrolled with one marketer. The customer opted to stay with their current marketer.

Marketer A - 1 Complaint

Type-Cancellation

07/22/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to cancel their enrolled with a CHOICE Marketer, Marketer A. Columbia Gas of Kentucky contacted Marketer A to determine the delay in the customer's cancellation request. Marketer A contacted customer and submitted cancellation 07/23/2015.

Marketer G - 2 Complaints

Type-Delayed Enrollment

03/15/2016 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be enrolled with a CHOICE Marketer, Marketer G. Columbia Gas of Kentucky contacted Marketer G to determine the delay in the customer's enrollment. Marketer G noted that they were unable to enroll the customer as the customer was already enrolled with another CHOICE marketer, Marketer A and had already advised the customer as such. The customer was advised they would need to contact their current marketer and cancel their contract before they could be enrolled with a new marketer. A customer can only be enrolled with one marketer. The customer opted to stay with their current marketer rather than enroll with Marketer G.

Type-Contract Rate Dispute

12/03/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding a dispute of their contracted rate with the CHOICE marketer, Marketer G. Columbia Gas of Kentucky contacted Marketer G to request information regarding the customers contracted rate. Marketer G contacted the customer on December 4, 2015, regarding the rate concern. During this call, Marketer G discussed the following facts and findings with the customer Marketer G conducted research of its records and determined the customer enrolled her natural gas account with Marketer G via web enrollment on September 24, 2015. The customer selected a variable rate program with an initial rate of \$2.4990 per MCf for the first month of service. The electronic letter of authorization ("LOA") which the customer electronically signed, was supplied confirming her intent to enroll her natural gas account into Marketer G's variable rate program. The order summary detailing the program the customer selected for her natural gas account was also provided. On October 27, 2015, a welcome package was mailed to the customer summarizing the variable rate program into which she had enrolled, along with the terms and conditions, clearly outlining the product, and terms of the offer. On November 20, 2015, the customer contacted Marketer G's customer service department to inquire about the rate associated with her natural gas account. Marketer G's customer service representative reviewed the variable rate program in which the customer had enrolled, along with our terms and conditions,

which clearly outlined the product and term of the offer. Upon receipt of this complaint, Marketer G conducted an analysis of the customer's natural gas account with regards to the claim she "received her bill in where she was billed at a rate of \$4.990 per Mcf and the contract reflects an initial rate of \$2.499 per Mcf. Marketer G immediately investigated its systems and corrected the rate. Marketer G honored its commitment to the customer and sent the customer a rebate check for the difference in gas supply charges. The customer stated she was satisfied with Marketer G's response and affirmed she wished to remain enrolled with Marketer G under the variable rate program.

Marketer H - 1 Complaint

Type-Cancellation

11/24/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding a request to cancel his contract with a CHOICE Marketer, Marketer H. Columbia Gas of Kentucky contacted Marketer H to determine the delay in the customer's cancellation of their contract. Marketer H called and spoke with the customer by phone on 12/01/15. Marketer H submitted a cancellation request on 12/01/15. The initial electronic cancellation request was rejected on 12/04/15 due to an incorrect Rate Code being submitted. Columbia Gas of Kentucky contacted Marketer H to advise of the error and provided the correct

rate code to use for the cancellation request. Marketer H resubmitted the cancellation request on 12/07/15 which was successful.

Marketer E - 2 Complaints

Type-Cancellation

05/28/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be enrolled with a CHOICE Marketer, Marketer E. Customer states she has been trying since 10/15/14 to enroll with Marketer E. Customer was enrolled with CHOICE marketer, Marketer A until 2/22/15. Customer was advised that she was enrolled with another marketer until 2/22/15 and needed to cancel her contract with that marketer before she could enroll with another marketer. Marketer E is working with the customer to enroll.

07/01/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be enrolled with a CHOICE Marketer, Marketer E. The customer wanted her enrollment date to be effective 09/2014. Columbia Gas of Kentucky contacted Marketer E Energy to determine the delay in the customer's enrollment. Marketer E noted that they were having difficulty with the electronic enrollment process as their submission was being rejected. Columbia Gas assisted with the enrollment process and Marketer E back dated the customers effective enrollment date to 09/2014 as requested.

Marketer J - 2 Complaints

Type-Solicitation for enrollment

07/27/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding solicitation by phone from a CHOICE Marketer, Marketer J. Customer states she has been contacted by phone several times by Marketer J who is attempting to enroll her. She does not want Marketer J to contact her again. Columbia Gas provided this request to Marketer J.

10/15/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding solicitation by phone from a CHOICE Marketer, Marketer J. Customer states she is currently enrolled with another CHOICE marketer, Marketer A and wants to remain with them. Customer wanted to make sure she was still enrolled with Marketer A. Customer was advised that she is still enrolled with CHOICE marketer, Marketer A. Customer does not want to be contacted by Marketer J again. Columbia Gas provided this request to Marketer J.

May 2014 - April 2015 - Total Marketer Complaints -15

Marketer F - 1 Complaint

Type-Supplier No Response

01/07/2015 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding his attempt to reach his CHOICE marketer, Marketer F regarding his desire to cancel his current contract. Customer states he has been unable to reach CHOICE marketer by phone. Columbia Gas of Kentucky contacted Marketer F and asked that they respond to the customer. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 01/30/2015.

Marketer Z - 1 Complaint

Type-Cancellation

07/29/2014 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding his request to cancel his enrollment with CHOICE marketer, Marketer Z. Customer stated he had contacted Marketer Z and requested to be removed. Columbia Gas of Kentucky contacted Marketer Z and asked that they respond to the customer. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 08/28/2014.

Marketer B - 3 Complaints

Type-Cancellation

07/01/2014 -Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding his request to cancel his enrollment with CHOICE marketer, Marketer B. Customer also stated they were to receive a \$25 gift card at the time of their enrollment. Columbia Gas contacted Marketer B to request details of the enrollment. The archived recording of the sales verification from 03/26/12 reflect that the account was presented as a commercial account. There was no mention of a gift card during the recorded conversation. The customer states she is authorized to "enroll on behalf of the company", she provides her business tax ID number and account number. The customer agreed to the commercial terms for Early Termination Fee assessment. The customer enrolled the account as a business as per the recording. Marketer B did not agree the enrollment should be cancelled without the Early Termination Fee.

03/13/2015- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding his request to cancel his enrollment with CHOICE marketer, Marketer B. Customer wishes to enroll with another CHOICE marketer, Marketer E. Columbia Gas contacted Marketer B to assist the customer with the cancellation. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 04/30/15.

Type-Enrollment

03/11/2015- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be enrolled with a CHOICE Marketer, Marketer B. Columbia Gas of Kentucky contacted Marketer B to determine the delay in the customer's enrollment. Marketer B noted that they were unable to enroll the customer as the customer was already enrolled with another CHOICE marketer and had already advised the customer as such. The customer was advised they would need to contact their current marketer and cancel their contract before they could be enrolled with a new marketer. A customer can only be enrolled with one marketer.

Marketer A - 3 Complaints

Type-Cancellation

08/18/2014- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to terminate their contract with their CHOICE marketer, Marketer A. Customer does not feel he should have to pay an early termination fee as he has been with the marketer for some time. Columbia Gas of Kentucky contacted Marketer A to assist the customer with his cancellation request. Marketer A released the customer from his contract without a cancellation fee. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 09/29/14.

12/17/2014- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding her request to terminate her contract with CHOICE marketer, Marketer A. Customer states she did not wish to renew her contract and contacted Marketer A on 10/15/14 to advise. However she is still with marketer, Marketer A. Columbia Gas of Kentucky contacted Marketer A to assist the customer with her cancellation. Marketer A contacted customer on 12/17/14 and advised she would be removed. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 01/30/15.

Type-Enrollment

02/02/2015- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be enrolled with a CHOICE Marketer, Marketer A. Columbia Gas of Kentucky contacted Marketer A to determine the delay in the customer's enrollment. Marketer B noted that they did process her enrollment however it may take up to 1-2 billing cycles. Columbia Gas of Kentucky's customer database records indicate that the enrollment notification was received on 01/30/15.15. The CHOICE marketer's rate will be reflected on the customer's February 2015 bill.

Marketer H -7 Complaints

Type-Cancellation

11/11/2014- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to terminate their contract with their CHOICE marketer, Marketer H. Customer enrolled with door to door solicitor. However he has changed his mind and wants to rescind his enrollment. Customer feels he was pressured to enroll. Columbia Gas of Kentucky contacted Marketer H to report the customer's concern. Marketer H reported that they passed the concern onto the representative's management team. Customer had not been enrolled at the time of the complaint and Marketer H stopped the enrollment process.

01/16/2015- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to terminate their contract with their CHOICE marketer, Marketer H. Customer misunderstood and thought she was being enrolled for assistance with her bill. Columbia Gas of Kentucky contacted Marketer H to report the customer's concern. Marketer H cancelled the customer's enrollment and waived the cancellation fee.

01/16/2015- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to terminate their contract with their CHOICE marketer, Marketer H. Customer states they have been unable to reach Marketer H to submit cancellation. Columbia Gas of Kentucky contacted Marketer H and requested they contact the customer to assist with the cancellation process.

Marketer H cancelled the customer's enrollment and waived the cancellation fee. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 04/30/15.

04/28/2015- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to terminate their contract with their CHOICE marketer, Marketer H. Customer states she contacted Marketer H for cancellation of her contract in November 2014 and she is still being billed at her Marketer H contracted rate. Columbia Gas of Kentucky contacted Marketer H and requested they contact the customer to assist with the cancellation process. Marketer H stated they cancelled the contract and customer should be back to Columbia Gas rate for the May 2015 billing cycle. Marketer H sent customer a check for \$50 as compensation. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 04/30/15.

Type-Unauthorized Enrollment

10/15/2014- Columbia Gas of Kentucky received a CHOICE related complaint from a customer stating that they she did not wish to enroll with CHOICE marketer, Marketer H. Columbia Gas of Kentucky's database records do not indicate that the customer is enrolled with Marketer H. Columbia Gas of Kentucky contacted Marketer H and requested they determine if the customer was on a pending

enrollment list and remove them. Marketer H stated they did not show a pending enrollment for this customer. Customer was advised they were not enrolled with CHOICE marketer, Marketer H.

10/23/2014- Columbia Gas of Kentucky received a CHOICE related complaint from a customer stating that they did not give Marketer H consent to enroll them as their CHOICE marketer. Customer stated they enrolled by telephone however she felt she was pressured to enroll and did not wish to proceed. Columbia Gas of Kentucky contacted Marketer H and requested they contact the customer to assist with the cancellation process. Marketer H responded on 10/29/14 that the cancellation request had been submitted and the customer's account had been flagged to prevent future solicitation.

12/12/2014- Columbia Gas of Kentucky received a CHOICE related complaint from a customer stating that they did not give Marketer H consent to enroll them as their CHOICE marketer. Columbia Gas of Kentucky's customer database records indicate that the customer was enrolled on 11/26/2014. Columbia Gas of Kentucky contacted Marketer H and requested they contact the customer to assist with the cancellation process. Marketer H stated they were unable to reach the customer by phone to discuss the issue and could not locate the customer's account in their database. Columbia Gas responded to Marketer H on 12/16/14 that the customer

was still showing has enrolled with Marketer H. Marketer H responded on 12/16/14 that a cancellation request had been submitted. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 01/30/15.

May 2016 - February 2017 - Total Marketer Complaints -13*

*Note: Twenty-six CHOICE related complaints were originally report for the time period of May 2016 - February 2017. However after further in depth investigation it was determined that thirteen of the twenty-six reported contact statistics were not CHOICE Marketer related complaints.

Marketer B - 3 Complaints

Type-Cancellation

09/23/2016 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding the rate that they were paying under their current contract with CHOICE marketer, Marketer B. Columbia Gas of Kentucky directed customer to contact their marketer via the phone number listed on their billing statement to discuss their contracted rate. Account records indicate that the customer cancelled their enrollment with Marketer B effective 11/29/16.

10/03/2016 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding his request to cancel his enrollment with CHOICE marketer, Marketer B. Customer stated he had contacted Marketer B and requested to be removed. Columbia Gas of Kentucky contacted Marketer B and asked that they respond to the customer. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 10/27/16.

11/23/2016- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding his request to cancel his enrollment with CHOICE marketer, Marketer B. Customer stated he had contacted Marketer B on 09/17/16 and requested to cancel his contract. Columbia Gas of Kentucky contacted Marketer B and asked that they provide details of the phone conversation. Marketer B responded that their phone call records indicate that the customer called on 09/29/16 and discussed the new renewal rate that was offered when his current agreement expired in November 2016. Customer indicated that he would "call back at a later time". Customer contacted Marketer B on 11/22/16 after auto renewal had occurred. Marketer B submitted a cancellation request on 11/23/16. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 12/30/16...

Marketer I - 1 Complaint

Type-Cancellation

02/21/2017 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding his request to cancel his enrollment with CHOICE marketer, Marketer I. Customer stated he had contacted Marketer I on 01/17/17 and requested to cancel his current contract. Columbia Gas of Kentucky contacted Marketer I and asked that they respond to the customer. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 03/01/17.

Marketer E - 2 Complaint

Type-Cancellation

12/29/2016 - Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding his request to cancel his enrollment with CHOICE marketer, Marketer E. Customer stated he had contacted Marketer E Energy and requested to cancel his current contract. Columbia Gas of Kentucky contacted Marketer E regarding cancellation request. Marketer E responded that they had processed the request. Columbia Gas of Kentucky's customer database records indicate that the cancellation notification was received on 12/30/16.

02/23/2017- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding the cancellation of his contract with CHOICE marketer, Marketer E. Upon investigation Columbia Gas of Kentucky found that the customer was disconnected in error on 01/25/17. An individual requested gas service at his premise address in error at the wrong address which lead to the termination of the customers CHOICE contract when the final bill was rendered. Columbia Gas of Kentucky contacted Marketer E and requested that they reinstate the customer's contract. Columbia Gas of Kentucky's customer database records indicate that the customer was re-enrolled with CHOICE marketer, Marketer E on 03/01/17.

Marketer G - 4 Complaint

Type-Contract Rate Dispute

10/11/2016- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding a dispute of her contracted rate with the CHOICE marketer, Marketer G. Columbia Gas of Kentucky contacted Marketer G to request information regarding the customer's contracted rate. Marketer G's records indicate that the customer was previously enrolled in a variable rate program, which is a rate that fluctuates monthly. The customer's enrollment in the variable rate program was effective 05/01/2015. On 08/29/16 customer contacted Marketer

G to inquire on available fixed rate programs. A fixed rate of \$5.3900 per MCF with an early termination fee was offered to the customer. The customer accepted this rate offer. A welcome packet was mailed to the customer which summarized the fixed rate program into which she was enrolling along with the terms and conditions. Marketer G conducted an analysis of the customer's concern with regards to her alleged bill reflecting "a higher rate" than the \$5.3900 per MCF. The current variable rate customer is billed at and confirmed the new fixed rate will be effective in Mrs. Sellers October-November 2016 billing cycle. Customer's bill reflects a change of billing rate on 9-28-2016 which would be effective for the October billing cycle. That cycle will bill on 10/21/2016 with the \$5.39 per MCF rate. Customer was advised contract enrollment changes can take up to 1-2 billing cycles

Type-Enrollment

02/21/2017- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be enrolled with a CHOICE Marketer, Marketer G. Columbia Gas of Kentucky contacted Marketer G to determine the delay in the customer's enrollment. Marketer G noted that they were unable to enroll the customer as the customer was already enrolled with another CHOICE marketer and had already advised the customer as such. The customer was

advised they would need to contact their current marketer and cancel their contract before they could be enrolled with a new marketer. A customer can only be enrolled with one marketer.

Type-Unauthorized Enrollment

07/27/2016- Columbia Gas of Kentucky received a CHOICE complaint related to a CHOICE Marketer, Marketer G whose representative was reported to be soliciting door to door and requesting to view customer's bills. Columbia Gas reported this concern to Marketer G who promptly investigated the claim to determine the company representative involved. Marketer G noted that they did not have a representative in the area of which there was a concern. However they stated they would remind their representatives of the code of conduct for representation of the CHOICE Program.

02/15/2017- Columbia Gas of Kentucky received a CHOICE related complaint from a customer regarding their request to be added to CHOICE marketer, Marketer G's "Do Not Call" and "Do Not Knock" lists. Columbia Gas of Kentucky contacted Marketer G to investigate the details of the concern. Marketer G conducted research of its records and determined the customer was approached once by a Marketer G door-to-door sales agent on January 10, 2017, and was presented with Marketer G's fixed rate program option for his natural gas account, which is a non-

fluctuating rate. During this presentation, the customer agreed to enroll his natural gas account into Marketer G's fixed rate program and voluntarily participated in a Third Party Verification to finalize the enrollment which explained the product terms, effective date, rescission period and any applicable early termination fee. Additionally, a welcome package was mailed to the customer summarizing the fixed rate program in which he enrolled, along with the terms and conditions, which clearly outlined the product and term of the offer. On January 11, 2017, the customer requested cancellation of enrollment which Marketer G immediately processed. The customer enrollment has been cancelled within the rescission period therefore no early termination fee was incurred. Customer was added to the Do Not Contact list.

Unknown Marketer - 3 Complaint

Type-Solicitation Method

01/17/2017- Columbia Gas of Kentucky received a CHOICE related complaint from a customer who stated that they had received a phone call from someone identifying themselves as a Columbia Gas of Kentucky CHOICE supplier. The customer stated that the caller asked for the account number. The customer advised the caller that she did not want to enroll in the CHOICE supplier. The

caller disconnect the call at this point of the conversation. The customer did not remember the name of the company the caller was representing. Columbia Gas of Kentucky was unable to reach out to the marketer as they are unknown.

01/24/2017- Columbia Gas of Kentucky received a CHOICE related complaint from a customer who stated that someone came to her mother's home requesting to see her Columbia Gas of Kentucky bill. The individual was not wearing any identification and would not provide one. The customer did not know the name of the company this individual was representing. Columbia Gas of Kentucky was unable to reach out to the marketer as they are unknown.

02/01/2017- Columbia Gas of Kentucky received a CHOICE related complaint from a customer who stated that someone came to her home requesting to see her Columbia Gas of Kentucky bill. The customer did not know the name of the company this individual was representing. Columbia Gas of Kentucky was unable to reach out to the marketer as they are unknown.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED APRIL 24, 2017

6. Provide summary annual customer participation rates, broken down between General Service — Residential and General Service — Other customers since the Choice program was first approved.

Response: Summary annual participation rates are as of May for each year.

Year	Total	Residential	Other
2001	42,888	38,268	4,620
2002	50,834	45,570	5,264
2003	46,095	41,280	4,815
2004	45,374	40,118	5,256
2005	40,548	35,698	4,850
2006	31,292	27,595	3,697
2007	29,119	25,756	3,363
2008	28,838	25,660	3,178
2009	32,621	29,188	3,433
2010	32,356	28,888	3,468
2011	33,348	29,004	4,344
2012	31,637	27,511	4,126
2013	29,691	25,620	4,071
2014	29,532	25,372	4,160
2015	28,501	24,458	4,043
2016	26,224	22,445	3,779

KY PSC Case No. 2017-00115
Staff's Data Request Set Two No. 7
Respondent: Judy M. Cooper

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED APRIL 24, 2017

7. Provide the annual number of marketers participating in the Choice program since it was first approved.

Response:

Year	Number of participating marketers
2000 at opening enrollment	4
2001	4
2002	3
2003	3
2004	3
2005	2
2006	2
2007	2
2008	2
2009	2
2010	5
2011	6
2012	9
2013	9
2014	10
2015	10
2016	11