

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF COLUMBIA)	
GAS OF KENTUCKY, INC. TO EXTEND ITS)	CASE NO.
SMALL VOLUME GAS TRANSPORTATION)	2021-00386
SERVICE)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO INTERSTATE GAS SUPPLY, INC., CONSTELLATION NEW ENERGY GAS
DIVISION, LLC, AND XOOM ENERGY KENTUCKY, LLC

Interstate Gas Supply, Inc., Constellation New Energy Gas Division, LLC, and XOOM Energy Kentucky, LLC (Joint Intervenors), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on April 18, 2022. The Commission directs Joint Intervenors to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Joint Intervenors shall make timely amendment to any prior response if Joint Intervenors obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Joint Intervenors fail or refuse to furnish all or part of the requested information, Joint Intervenors shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Joint Intervenors shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of James Crist (Crist Testimony), pages 8–9. Explain whether requiring customers to reaffirm their intent to participate in Columbia Gas of Kentucky, Inc.'s (Columbia Kentucky) Small Volume Aggregation Service and Small Volume Gas Transportation Service (CHOICE program) on a regular basis or at the end of their current contract term would harm these customers.

2. Refer to the Crist Testimony, page 9. For fixed rate contracts, confirm that customers bear the risk that Columbia Kentucky's gas costs will be lower than the fixed rate.

3. Refer to the Crist Testimony, page 10. Identify the CHOICE program marketers that provide carbon offsets in Columbia Kentucky's service area.

4. Refer to the Crist Testimony, pages 11–12. Explain whether natural gas customers can purchase carbon offsets separate from their natural gas, in the way that electric customers can purchase renewable energy credits.

5. Refer to the Crist Testimony, page 19.

a. Provide an analysis that could determine the value of the CHOICE program beyond a strict comparison of the price paid and the standard gas costs.

b. If customers generally pay more under the CHOICE program and are generally uninformed about its existence and their own participation, explain the value of the CHOICE program to Columbia Kentucky's ratepayers.

c. Separately for each Joint Intervenor, provide the savings achieved annually for the last five years.

6. Refer to the Crist Testimony, page 21.

a. Explain why Columbia Kentucky should be responsible for marketing the Choice program on behalf of the gas marketers.

b. Provide the estimated cost of creating and maintaining a new customer package and explain whether Columbia Kentucky or the gas marketers would bear these costs.

c. Explain why Joint Intervenors are more concerned with approximately half of Columbia Kentucky's residential customers being unaware of the CHOICE program than the approximately 60 percent of current CHOICE program participants that do not understand they are currently enrolled in the program.

d. Explain whether fixed cost contracts discourage energy efficiency by removing price signals.

7. Refer to the Crist Testimony, page 22.

a. Explain why Columbia Kentucky's call center should be trained on the specifics of the gas marketers' offerings, including why these questions should not be solely addressed by the gas marketers.

b. Provide the Joint Intervenors' efforts to educate Columbia Kentucky's customers on the existence of the CHOICE program.

c. Provide the Joint Intervenors' efforts to educate current CHOICE program participants on their participation in the program.

d. State whether Joint Intervenors assess the satisfaction of their CHOICE participants and, if so, explain the methods used.

8. Refer to the Crist Testimony, page 23.

a. Explain whether longer term contracts provide greater value to CHOICE participants.

b. If the CHOICE program expiration date is extended to March 31, 2027, confirm that gas marketers still could not enter into 60-month contracts that expire before the CHOICE program.

c. Explain whether a contract term that expires after the CHOICE Program expiration date would receive similar conditions and pricing to contracts that expire within the current program extension. If not, explain the differences.

9. Explain whether residential customers who rent their homes are able to utilize longer term contracts.

10. Explain whether the cancellation policies apply to customers that leave Columbia Kentucky's service area while under contract.

11. Separately for each Joint Intervenor, for Columbia Kentucky's CHOICE program, provide the:

- a. Total number of customers;
- b. Total number of customers with fixed rate contracts; and
- c. Total number of customers with environmental attribute contracts.

12. Explain whether the Joint Intervenors conduct surveys to gauge customer satisfaction. If so, provide those survey results for the two most recent surveys.



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DATED MAR 31 2022

cc: Parties of Record

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