

290 W. Nationwide Blvd.
Columbus, Ohio 43215
Direct: 614.813.8685
josephclark@nisource.com



April 8, 2022

ELECTRONICALLY FILED

Linda Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602-0605

RECEIVED

APR 11 2022

**PUBLIC SERVICE
COMMISSION**

RE: KY PSC Case Nos. 2022-00019

Dear Ms. Bridwell,

Please find attached and accept for filing the Answer of Columbia Gas of Kentucky, Inc. in the above-referenced matter. I certify that the electronically filed documents are a true and accurate copy of the paper copy that was sent to the Complainant in this matter via US Postal Service on this date.

Sincerely,

/s/ Joseph M. Clark

Joseph M. Clark
Assistant General Counsel
Enclosure(s)

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)	
)	
MICHAEL L. PAWLEY,)	
)	
COMPLAINANT)	
)	
v.)	
)	Case No. 2022-00019
COLUMBIA GAS OF KENTUCKY,)	
INC.)	
)	
DEFENDANT)	
)	

ANSWER OF COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. (“Columbia”), the above-named defendant, for its Answer to the Complaint in the proceeding, respectfully states as follows.

OVERVIEW

On November 22, 2021, the Kentucky Public Service Commission (“Commission”) issued its Final Order in Case Number 2021-00403, which approved Columbia’s proposed Gas Cost Adjustment (“GCA”), filed on October 29, 2021, and amended on November 2, 2021. This adjustment was approved for billing beginning on November 29, 2021. Columbia implemented new rates in accordance with the Commission’s Final Order, effective with its December 2021 billing cycle. The first day of December 2021 billing cycle was November 29, 2021.

Columbia issues its customer bills in groups, called “Units.” These Units are grouped based on geographic location. Customer bills are based on a meter reading schedule assigned to each billing Unit. The number of days for each Unit’s meter reading schedule vary each month based on the number of working days in that month. For example, the December 2021 billing cycle contained two company holidays on which meter reading did not take place. Mr. Michael L. Pawley’s (“Complainant”) address dictates that he be placed in Columbia’s Unit 2. The approved update to Columbia’s GCA rate was applied to Unit 2 on November 30, 2021.

Complainant alleges in his January 18, 2022 Complaint (“Complaint”) that Columbia “normally reads my meter on a 30-day billing cycle.” Based upon this assumption, he calculated a new pro-rated rate for himself. However, Complainant’s “30-day billing cycle” assumption is incorrect. Columbia’s billing cycle is based on the number of working days in a calendar month. By way of illustration, here are the number of days in each billing cycle for Columbia’s Unit 2 since January 2021:

April 2022	29	August 2021	30
March 2022	29	July 2021	29
February 2022	29	June 2021	32
January 2022	34	May 2021	30
December 2021	33	April 2021	29
November 2021	29	March 2021	29
October 2021	30	February 2021	32
September 2021	31	January 2021	31

Additionally, Columbia has included Attachments A through C to this Answer. These contain Complainant's bills for the November 2021, December 2021, and January 2022 cycles. The meter reading information is highlighted in each attachment. The customer bill shows the meter reading date for the current bill and the next scheduled meter reading date. Attachment A, Complainant's November 2021 bill lists November 30, 2021 as Complainant's next meter reading date. This bill was dated October 29, 2021, 24 days prior to the Commission's Order setting the effective date of the GCA rate. All other personal information, including consumption, has been redacted from the attachments.

Complainant's recalculation of his December 2021 bill is based upon a false premise. Complainant alleges that Columbia "delayed reading my meter till 11/30, 3 days longer than normal, to take advantage of the rate increase." This is simply not true. The number of billing and meter reading days calculated in each monthly billing cycle is based on the number of working days in that month, not on the approval of any change to rate schedules by the Commission. Columbia properly billed Complainant the correct GCA rate at the correct time, in accordance with the Commission's Order of November 22, 2021, in Case No. 2021-00403.

ANSWER TO THE COMPLAINT

1. Columbia denies that it incorrectly calculated the amount billed to the Complainant.
2. Columbia denies that it took action to delay the reading of Complainant's meter.
3. Columbia denies any and all other allegations in the Complaint.

AFFIRMATIVE DEFENSES

1. Columbia avers that based on the information available to it, it at all times acted in accordance with all applicable statutes, Commission orders, Commission rules, and Columbia's tariff.

WHEREFORE, Columbia prays that the Complaint be dismissed.

Dated at Columbus, Ohio, this 8th day of April 2022.

Respectfully submitted,

COLUMBIA GAS OF KENTUCKY, INC.

By: /s/ Joseph M. Clark
Joseph M. Clark
Assistant General Counsel

Joseph M. Clark
Assistant General Counsel
290 W. Nationwide Blvd.
Columbus, Ohio 43215
Telephone: (614) 813-8685
Fax: (859) 288-0258
josephclark@nisource.com

Attorney for
COLUMBIA GAS OF KENTUCKY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served upon all parties of record by regular U.S. Mail this 8th day of April 2022.

/s/ Joseph M. Clark _____

Joseph M. Clark


Attorney for

COLUMBIA GAS OF KENTUCKY, INC.


SERVICE LIST


Michael L. Pawley
96 Lantern Way
Nicholasville, Kentucky 40356


Contact Us

- 

Phone
Emergency Service 24/7
1-800-432-9515
For gas leaks or odors of gas
- Customer Call Center Hours
1-800-432-9345
7 a.m. - 7 p.m. Mon. - Fri.

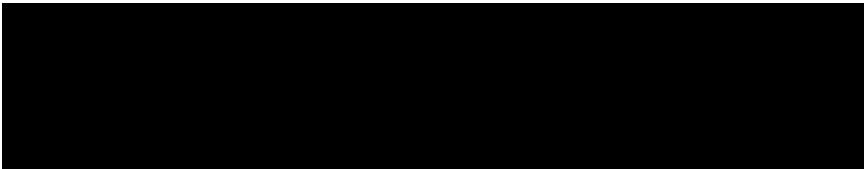
For hearing-impaired relay call 711.
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Web
Make payments and access your account at ColumbiaGasKY.com
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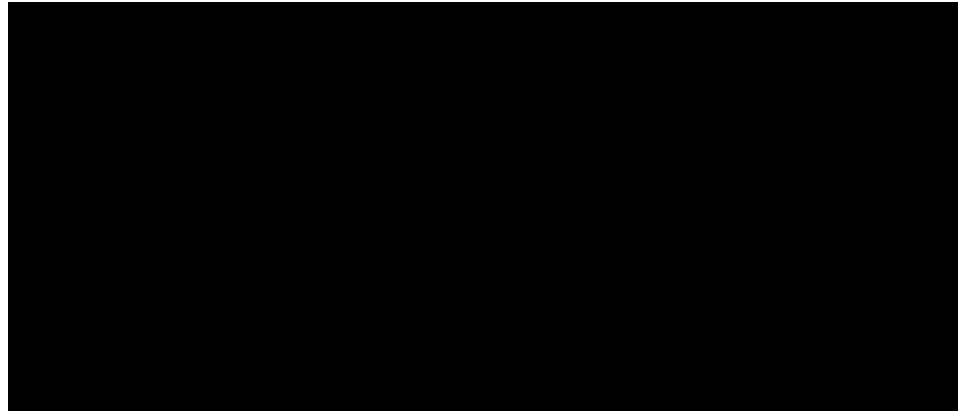
Mail Payments
Columbia Gas of Kentucky
PO BOX 4660
Carol Stream IL 60197-4660
- 

Authorized Payment Locations
Find locations online at ColumbiaGasKY.com

Account Profile



Account Summary



Your Safety

- In case of an emergency, such as odor of gas, carbon monoxide or fire:
1. Leave the area immediately.
 2. Leave windows and doors in their positions and avoid doing anything that could cause a spark.
 3. From a safe area, call **911** and Columbia Gas at **1-800-432-9515**.

Always Call 8-1-1 Before You Dig
If you're planning a home or landscaping project, call Kentucky 811 at 8-1-1 at least two business days before digging. A representative will mark the approximate location of underground utility lines for free.

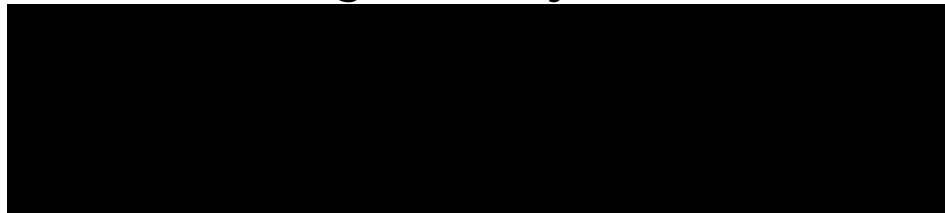


Employee Identification
All of our employees and contractors carry photo identification. If someone claims to represent us, ask to see identification. Call the police if you see suspicious activity.

Message Board

- We've made it easier for you to sign up for paperless billing! Enjoy the convenience of managing your account online! You will receive monthly email alerts, have 24/7 account access and up to two years of past bills and payment history. Sign up at **GoPaperFreeToday.com!**
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13 Month Usage History




Nov 29 Dec 33 Jan 31 Feb 32 Mar 29 Apr 29 May 30 Jun 32 Jul 29 Aug 30 Sep 31 Oct 30 Nov 29
2020 Monthly Billing Days 2021

13 Month Usage History continued on next page

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Web
ColumbiaGasKY.com



Phone
1-800-432-9515



P.O. Box 14241
Lexington, KY 40512-4241



COLUMBIA GAS
PO BOX 4660
CAROL STREAM IL 60197-4660



Helpful Definitions

Customer Charge covers a portion of the fixed costs required to ensure that natural gas service is available to your home. This amount is the same with each bill.

Estimated Readings are calculated based on your typical monthly usage rather than on an actual meter reading.

Gas Delivery Charges are the costs of delivering the gas to retail customers. The charges for these services are regulated and these services must be purchased from Columbia Gas.

Gas Supply Cost includes the cost of natural gas, interstate pipeline charges, storage costs, and related charges and is passed through to customers at cost without markup.

Gas supply service may be purchased from a participating competitive gas supplier in the Customer CHOICE program.

Mcf is equal to 1,000 cubic feet and is used to measure your gas usage.

Legal Information

Rate Schedule
Information about rate schedules is available upon request or at ColumbiaGasKY.com.

Bankruptcy Notices
Mail to Columbia Gas of Kentucky, Revenue Recovery, PO Box 117, Columbus, OH 43216.

Other Correspondence (except payments)
Mail to Columbia Gas of Kentucky, P.O. Box 2318, Columbus, OH 43216-2318 or contact us at ColumbiaGasKY.com.

13 Month Usage History *continued*

Meter Readings - 29 Billing Days

Actual Reading on 10/28

Actual Reading on 9/29

-

Gas Used (Mcf)

Your next meter reading date is 11/30/2021.

Detail Charges

Change Contact Information

By providing Columbia Gas a telephone number, it enables us to call you about your utility service, future service appointments and other important information pertaining to your account and you're agreeing to receive autodialed and prerecorded voice calls. Please notify us if you wish to opt out or if you no longer use this number. Thank you in advance.

Address

City

State

Zip Code

Phone Number

Add or Edit Email

WinterCare Contribution

WinterCare, Columbia Gas of Kentucky's fuel fund program, is a fund of last resort for households who have exhausted all other sources of assistance and still have trouble paying their heating bills. The fund is administered by The Community Action Council and is supported through donations from customers and matching contributions from Columbia Gas.

* Your donation is tax-deductible.

Monthly Contribution

One-Time Contribution

\$10

\$5

\$1

\$

\$



Account Number: [REDACTED]
 Statement Date: 12/01/2021
 491
 Page 1 of 2

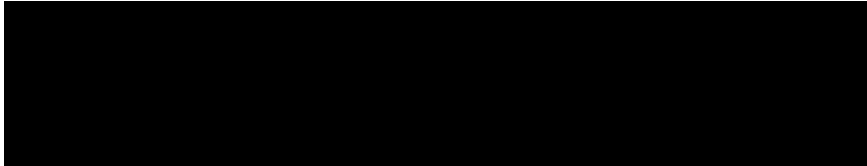
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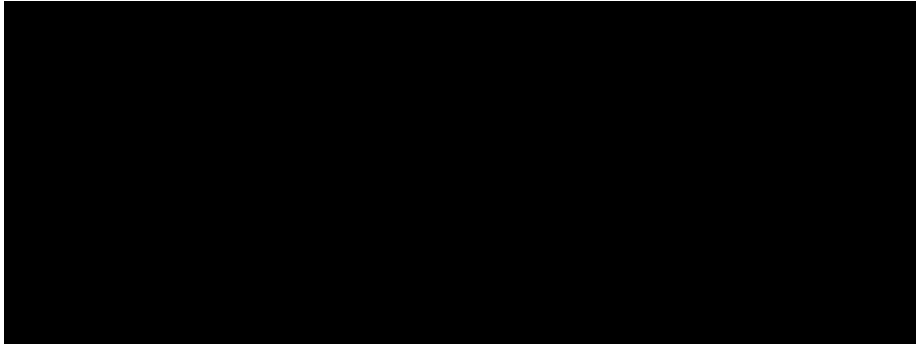
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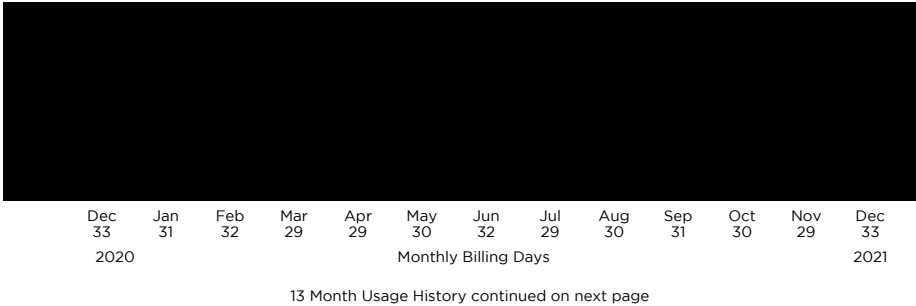


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Message Board

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 ColumbiaGasKY.com

Phone
 1-800-432-9515

Account Number: [REDACTED]

P.O. Box 14241
 Lexington, KY 40512-4241



COLUMBIA GAS
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13 Month Usage History *continued*

Usage Comparison - Mcf			
Month	Mcf	Avg Temp	Mcf Per Day
Dec 20	[REDACTED]	49.4°	[REDACTED]
Nov 21	[REDACTED]	62.5°	[REDACTED]
Dec 21	[REDACTED]	43.8°	[REDACTED]
[REDACTED]			
Your next meter reading date is 01/03/2022.			

Meter Readings - 33 Billing Days
Actual Reading on 11/30 [REDACTED]
Actual Reading on 10/28 - [REDACTED]
Gas Used (Mcf) [REDACTED]

Detail Charges

[REDACTED]

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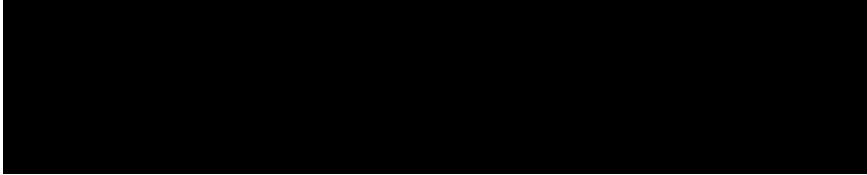
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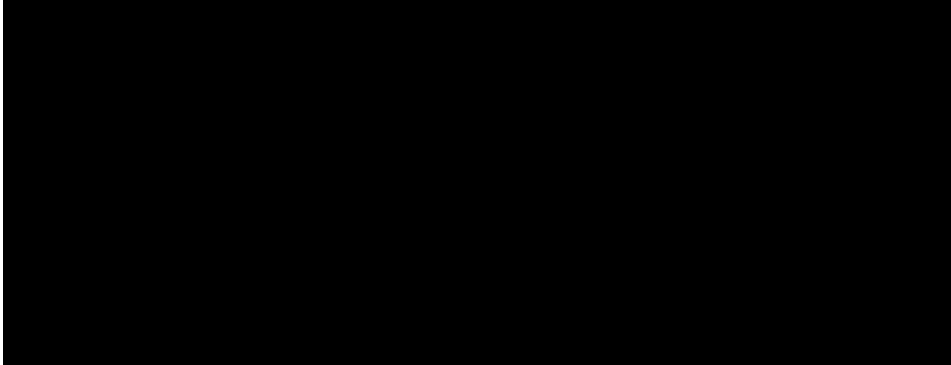
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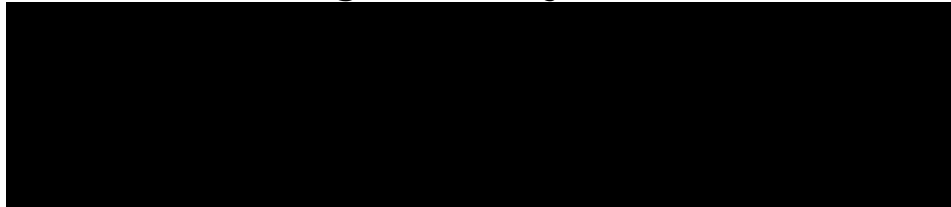


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Jan 31	Feb 32	Mar 29	Apr 29	May 30	Jun 32	Jul 29	Aug 30	Sep 31	Oct 30	Nov 29	Dec 33	Jan 34
2021												
Monthly Billing Days												
2022												

13 Month Usage History continued on next page

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