

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF COLUMBIA	)	CASE NO.
GAS OF KENTUCKY, INC. FOR APPROVAL OF	)	2022-00049
THE GREEN PATH RIDER PILOT PROGRAM	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. (Columbia Kentucky), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on June 23, 2023. The Commission directs Columbia Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> 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).

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

Columbia Kentucky shall make timely amendment to any prior response if Columbia Kentucky obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Columbia Kentucky fails or refuses to furnish all or part of the requested information, Columbia Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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, Columbia Kentucky shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Erich Evans (Evans Direct Testimony), Exhibit A.

a. Provide the number of customers the projected annual usage of 109,020 Mcf is based on.

b. Explain how Columbia Kentucky estimated the number of customers that would be interested in the Green Path pilot program.

c. Explain how Columbia Kentucky determined the projected annual Mcf usage, i.e. whether it is the combined average usage of GSR and GSO customers, or something else.

d. Explain how Columbia Kentucky determined the annual education costs of \$11,400. Provide any supporting documentation or calculations.

e. Explain how Columbia Kentucky determined the annual IT programming costs of \$96,888. Provide any supporting documentation or calculations.

2. Refer to the Evans Direct Testimony, page 7, line 14 through page 8, line 2, in which Columbia Kentucky discusses the survey it completed to determine if customers would be interested in lowering their carbon footprint for an additional fee. Provide a copy of the survey report.

3. Refer to the Evans Direct Testimony, page 9, line 4. Confirm that the bundled price of \$3 is the price per Dth, and that the per Mcf price is \$3.29 as indicated in Exhibit A of Evans Direct Testimony.

4. State whether other NiSource subsidiaries have similar programs. If so, provide descriptions of those programs. If not, state whether similar programs are or will be requested in other jurisdictions. If not, explain why.

5. Provide descriptions of similar proposed or approved programs, regardless of the utility, in other states, to the extent Columbia Kentucky has knowledge of any such programs.

6. Explain why industrial sales customers are not eligible for the pilot program.

7. Confirm that a customer who wants to invest in carbon emission reductions is limited to reductions of 100 percent of his own usage. If not, explain why not.

8. Refer to the Evans Direct Testimony, page 8, footnote 1,
  - a. Provide the percentage of the customer base represented by 87 responses.
  - b. Provide the percentage of the customer base represented by 141 responses.
  - c. Explain how each of these percentages is statistically significant to justify a new program.
9. Refer to the Direct Testimony of Andrew Campbell (Campbell Direct Testimony), page 9, lines 1–13. Provide examples of conditions or requirements that would cause the third-party provider to terminate the program.
10. Refer to the Campbell Direct Testimony, page 5, lines 5–14. Provide a copy of the third-party supply agreement.
11. Refer to the Campbell Direct Testimony, page 4, lines 15–20, in which Columbia Kentucky discusses the purchases of renewable natural gas environmental attributes and carbon offsets. State whether, outside of the third-party agreement, Columbia Kentucky or any of its affiliates have any type of relationship with the third-party provider.
12. Confirm that the Joint Stipulation and Settlement Agreement filed in Case No. 2021-00386<sup>2</sup> contemplated the offering of gas/carbon neutral products by Choice Program marketers and discuss the possible impacts of the proposed Green Path Rider

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<sup>2</sup> Case No. 2021-00386, *Electronic Tariff Filing of Columbia Gas of Kentucky, Inc. to Extend Its Small Volume Gas Transportation Service* (filed Sept. 22, 2022), Joint Stipulation and Settlement Agreement.

on Columbia Kentucky sales customers who might otherwise be interested in participating in Choice marketers' green product offerings.



Linda C. Bridwell, PE  
Executive Director  
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DATED     JUN 06 2023    

cc: Parties of Record

Case No. 2022-00049

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