

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 SECOND REQUEST FOR INFORMATION
TO COLUMBIA GAS OF KENTUCKY, INC

Columbia Gas of Kentucky, Inc (Columbia Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on July 21, 2023. The Commission directs Columbia Kentucky 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 person supervising the preparation of the response on behalf of the entity that 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).

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 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Columbia Kentucky's response to Item 1 of Commission Staff's First Request for Information (Staff's First Request).

a. Provide the number of Columbia Kentucky's residential and commercial customers to which one percent was applied to calculate the number of estimated participating customers, and the time period from which the number of customers was taken. To the extent the customer numbers do not match Columbia

Kentucky's 2021 or 2022 annual report numbers, explain the use of 360 residential and 140 commercial customers as the participant estimates.

b. State whether Columbia Kentucky's estimate of one percent of customers that would participate in the program was based on the survey results or something else.

c. State how the average usage of residential and commercial customers was derived. To the extent the usage numbers do not match Columbia Kentucky's 2021 or 2022 annual report numbers, explain the use of 68.4 Mcf and 602.9 Mcf for residential and commercial customers respectively as the usage estimates. Provide any supporting calculations.

d. The response to Item 1.e. indicates that total information technology (IT) costs to prepare the billing system utilized for the Green Path rider is \$631,792. Confirm that the response to Staff's First Request, Item 4 indicates that two of the four affiliates to whom a portion of the IT programming costs was allocated had the proposed Green Path Rider programs rejected by its state regulatory commissions. In addition, state whether the IT costs have already been incurred, and if so, how these costs are to be recovered by and from affiliates whose programs were not approved.

2. Refer to Columbia Kentucky's response to Staff's First Request, Item 4 which indicates that Northern Indiana Public Service Company (NIPSCO) has an approved Green Path Rider program. Explain why NIPSCO was not allocated part of the IT costs.

3. Refer to Columbia Kentucky's response to Staff's First Request, Item 4. Provide a summary of the reasoning for the rejection of each of the Green Path Rider

programs proposed in Pennsylvania and Maryland, and the substance of the objection of the parties to the proposed program in Ohio that was withdrawn as a result of a settlement.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
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DATED JUL 05 2023

cc: Parties of Record

Case No. 2022-00049

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