

200 Civic Center Drive Columbus, OH 43215 (614) 460.6000 Fax: (614) 460.6986

February 24, 2005

Ms. Beth A. O'Donnell, Executive Director Public Service Commission of Kentucky 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602

RECEIVED
FOR 9 4 2005

Re: **PSC Case No. 2004-00462**

Dear Ms. O'Donnell,

Enclosed for filing with the Commission are the original and nine copies of Columbia Gas of Kentucky's Supplemental to its Application in Case No. 2004-000462. Please call me at (614) 460-4648 should you have any questions about this matter.

Very truly yours,

Stephen B. Seiple Lead Counsel

Enclosures

cc: Richard S. Taylor Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION RECEIVED

In the Matter of:)	B 2 4 2005
THE APPLICATION OF COLUMBIA GAS OF KENTUCKY, INC. TO IMPLEMENT A NEW SMALL VOLUME GAS TRANSPOR	AS) A) R-)	COMMISSION
TATION SERVICE, A GAS PRICE HEDGING PLAN, AN OFF-SYSTEM SALES AND CAPACITY RELEASE REVENUE SHARING MECHANISM, AND A GAS COST INCENTION.	ND) NG)	
	THE APPLICATION OF OF KENTUCKY, INC.	

Columbia Gas of Kentucky, Inc. ("Columbia") filed its Application in this docket on November 30, 2004. Since that date Columbia has continued to discuss with CHOICE Program marketers issues associated with the Application. As a result of those discussions, Columbia has agreed to make several revisions to its Application, as set forth below.

APPLICATION ATTACHMENT A -PROGRAM DESCRIPTION PAGE 13

The existing established marketer rate codes or billing rates are grandfathered. Each marketer may establish up to five new billing rates at no charge. The number of allowed changes to billing rates in any calendar year should be increased to twenty-four rather than twelve as originally stated. Attached hereto as Attachment 1 is a substitute page 13 to the original Program Description in which the changes are marked, as well as a clean copy of the same page. The clean

copy in Attachment 1 should be substituted for the original page 13 in Attachment A of the Application.

APPLICATION ATTACHMENT B - PROPOSED TARIFFS SHEETS 7a AND 32

The Off-System Sales Capacity Release Adjustment ("OSCRA") factor will be applied to the demand component of Columbia's Gas Cost Adjustment and therefore will be credited to CHOICE Program customers as a credit within the charge to marketers for Balancing Services. This will enable a more accurate comparison for customers between Columbia's rate and the offers of marketers. The revision will allow the Actual Gas Cost Adjustment specified on Tariff Sheets 32 and 7a to remain in effect for the commodity adjustments with the addition of the Gas Cost Incentive Adjustment. The previously proposed revisions to Sheets 32 and 7a of separate OSCRA language are withdrawn. Substitute Revised Sheets 7a and 32 are attached hereto as Attachment 2, and should be substituted for the original sheets in Attachment A of the Application.

APPLICATION ATTACHMENT E - BALANCING CALCULATION

The Balancing Calculation as originally filed was calculated based on expected annual demand contracts and charges. As stated on page 7 of the Application, the balancing service fee will be priced equal to the difference between the cost of assigned capacity and the total demand charge to GCA customers. On January 28, 2005, Columbia filed its quarterly Gas Cost Adjustment to be effective March through May 2005. Substitute Attachment E is attached hereto as Attachment 3, and it updates the cost of assigned capacity and the demand charge to GCA customers to reflect Columbia's most recent GCA revisions. The updated schedule in Attachment 3 should be substituted for the original Attachment E of the Application.

As noted above, Columbia proposes to apply the OSCRA to the demand component of its GCA. Therefore, the OSCRA would be included in the amount shown on Line 14 of Attachment E. Columbia anticipates that the first OSCRA would be calculated in its September GCA filing.

Dated this 24th day of February 2005.

Respectfully submitted,

COLUMBIA GAS OF KENTUCKY, INC.

By:

Stephen B. Seiple Lead Counsel

Stanley J. Sagun, Assistant General Counsel

Stephen B. Seiple, Lead Counsel

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Attorneys for

COLUMBIA GAS OF KENTUCKY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Supplement to Application of Columbia Gas of Kentucky, Inc. was served upon those individuals listed in the Service List below by regular U.S. mail this 24th day of February 2005.

Stephen B. Seiple Attorney for

COLUMBIA GAS OF KENTUCKY, INC.

SERVICE LIST

Hon. Elizabeth E. Blackford Hon. Dennis G. Howard II Assistant Attorneys General 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204

Hon. Joe F. Childers 201 W. Short Street Suite 310 Lexington, KY 40507

Hon. James R. Cox Cox, Bowling and Johnson PLLC 8303 Shelbyville Road Louisville, KY 40222

Mr. Scott White President Interstate Gas Supply, Inc. 5020 Brandenton Ave. Dublin, OH 43017 Hon. Leslye M. Bowman Hon. David J. Barberie Lexington-Fayette Urban County Government Department of Law 200 East Main Street Lexington, KY 40507

Hon. John W. Bentine Hon. Bobby Singh Chester, Willcox & Saxbe, LLP 65 East State Street Suite 1000 Columbus, OH 43215-4213

Hon. Trevor L. Earl Reed, Weitkamp, Schell & Vice PLLC 500 West Jefferson Street, Suite 2400 Louisville, KY 40202-2812

Ms. Robi Artman-Hodge MxEnergy, Inc. 20 Summer Street Stamford, CT 06901

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FEB 2 4 2005

PUBLIC SERVICE COMMISSION

ATTACHMENT 1

- 1. Fixed rate per Mcf provided by the marketer each month, which will be applied to the customer's consumption to determine the applicable charges.)
- 2. Flat amount per month (a flat amount per month provided by the marketer will establish the applicable charge. Budget Payment Plan customers would not have the gas cost portion adjusted during the year.)
- 3. Flat reduction to Columbia's bill.
- 4. Percentage reduction to Columbia's bill.
- 5. Other options proposed by marketers will be considered by Columbia.

Customers must be grouped by billing option.

Charges for Billing Rate Changes

On March 21, 2005, the then effective billing rates of participating marketers shall be grandfathered as established billing rates and subsequent to April 1, 2005, eEvery marketer may establish up to five billing rates without incurring any Columbia charge to establish the marketer's billing rates in Columbia's billing system. In addition, each marketer may make up to two billing rate changes per month, up to a total of twelvetwenty-four changes in any calendar year, without incurring any Columbia charge to revise the marketer's billing rates in Columbia's billing system. A billing rate change is defined as: 1) a change in an existing marketer billing rate or 2) the establishment of a new marketer billing rate.

If any marketer desires to change more than two billing rates in any given month, or desires to change more than twelvetwenty-four billing rates in any calendar year, then Columbia shall charge the marketer \$25 for each billing rate change in excess of the billing rate change limits described above. Any such charges will be deducted from the amount of the check that Columbia sends to the marketer for gas commodity.

Payment to Marketer

Columbia will issue a check to the marketer by the last business day of the following calendar month for 97.5% of the marketer's revenues from the previous billing month less the cost for billing and any other outstanding balances Marketer owes Columbia. Columbia will thereafter assume the risk of collecting payment for the gas commodity from small volume transportation customers.

Cost for Billing

The cost shall be \$.20 per account, per month for Columbia to provide billing for the Marketer. Such fee shall reduce the amount remitted each month to the marketer for its revenues.

- 1. Fixed rate per Mcf provided by the marketer each month, which will be applied to the customer's consumption to determine the applicable charges.)
- 2. Flat amount per month (a flat amount per month provided by the marketer will establish the applicable charge. Budget Payment Plan customers would not have the gas cost portion adjusted during the year.)
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Supplemental Application February 24, 2005 Attachment 2 Page 1 of 4

SUBSTITUTE Revised Sheet No . 7a Superceding Twelfth Revised Sheet No. 7a

COLUMBIA GAS OF KENTUCKY, INC.

P.S.C. Ky. No. 5

CHERENTI	v	EFFECTIVE BILLING RATES
CURRENIL	_ T	EFFECTIVE BILLING RATES

RATE SCHEDULE SVGTS	Delivery Charge per Mcf

General Service Residential

First 1 Mcf or less per month \$ 6.95 (Minimum Bill)

Over 1 Mcf per month 1.8715

General Service Other

First 1 Mcf or less per month \$18.88 (Minimum Bill)

 Next 49 Mcf per month
 1.8715

 Next 350 Mcf per month
 1.8153

 Next 600 Mcf per month
 1.7296

 Over 1000 Mcf per month
 1.5802

Intrastate Utility Service

For all volumes per month \$ 0.038

Actual Gas Cost Adjustment

For applicable volumes per month \$ 0.1458

RATE SCHEDULE SVAS

Balancing Charge – per Mcf \$ 1.0570

DATE OF ISSUE: November 30, 2004 DATE EFFECTIVE: April 1, 2005

ISSUED BY: Joseph W. Kelly President

Supplemental Application February 24, 2005
Attachment 2
Page 2 of 4
SUBSTITUTE Second Sheet No. 32
Superceding
Original Sheet No. 32

COLUMBIA GAS OF KENTUCKY, INC.

P.S.C. Ky. No. 5

SMALL VOLUME GAS TRANSPORTATION SERVICE (SVGTS) RATE SCHEDULE (Continued)

ACTUAL GAS COST ADJUSTMENT

Volumes delivered to all customers under this rate schedule are subject to the sum of the Refund Adjustment, SAS Refund Adjustment, Actual Cost Adjustment, Balancing Adjustment and Gas Cost Incentive Adjustment set forth on Sheet 48. A customer who is or has been receiving service under this tariff shall be responsible for this adjustment only for those months of the prior twelve months during which they were served under a sales service tariff.

LOCAL FRANCHISE FEE OR TAX

To the extent applicable, the above rates and charges are subject to Local Franchise Fee or Tax as set forth on Sheet No. 52.

LATE PAYMENT PENALTY

Late payment penalties shall apply to service under this rate schedule as provided in the General Terms, Conditions, Rules and Regulations, Section 25.

OTHER PROVISIONS

Where a Customer has installed a gas light(s) for continuous street or outdoor lighting in lighting devices approved by Company and the gas used by such light(s) is unmetered, the gas consumed by such light(s) shall be assumed to be two thousand (2,000) cubic feet per month when the Btu/hour input rating for such light(s) is 2,700 or less. For each additional 1,350 Btu/hour input or fraction thereof, the assumed consumption shall be increased by one thousand (1,000) cubic feet per month. Such assumed consumption shall be billed under the agreement Customer has with Marketer for metered consumption and shall be added to the Customer's metered usage and the total billed according to the rates contained herein.

RIGHT OF REFUSAL

Should Columbia be prohibited from assigning capacity, as specified in its Small Volume Aggregation Service Rate Schedule, for any reason whatsoever, including but not limited to directives from the Commission or any court having jurisdiction over said matters, Columbia shall have the right to refuse to accept new small volume transportation customers under this rate schedule.

GENERAL TERMS, CONDITIONS, RULES AND REGULATIONS

Service furnished under this Rate Schedule is subject to Columbia's General Terms, Conditions, Rules and Regulations applicable to all Rate Schedules.

DATE OF ISSUE: November 30, 2004 DATE EFFECTIVE: April 1, 2005

Issued by: Joseph W. Kelly President

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Page 3 of 4 SUBSTITUTE Thirteenth Revised Sheet No . 7a

Superceding

Twelfth Revised Sheet No. 7a

COLUMBIA GAS OF KENTUCKY, INC.

P.S.C. Ky. No. 5

CURRENTLY EFFECTIVE BILLING RATES

RATE SCHEDULE SVGTS Delivery Charge per Mcf

General Service Residential

First 1 Mcf or less per month \$ 6.95 (Minimum Bill)

Over 1 Mcf per month 1.8715

General Service Other

First 1 Mcf or less per month \$18.88 (Minimum Bill)

 Next 49 Mcf per month
 1.8715

 Next 350 Mcf per month
 1.8153

 Next 600 Mcf per month
 1.7296

 Over 1000 Mcf per month
 1.5802

Intrastate Utility Service

For all volumes per month \$ 0.038

Actual Actual Gas Cost Adjustment

For applicable volumes per month \$ 0.1458

RATE SCHEDULE SVAS

Balancing Charge – per Mcf \$ 1.0570

DATE OF ISSUE: September 1 November 30, 2004

DATE EFFECTIVE: September 2004 Billing Cycle

August 27, 2004April 1, 2005

ISSUED BY: Joseph W. Kelly President

Issued by authority of an Order of the Public Service Commission in Case No. 2004 00299 dated August 26, 2004

Supplemental Application February 24, 2005
Attachment 2
Page 4 of 4
SUBSTITUTE Second Sheet No. 32
Superceding

Original Sheet No. 32

COLUMBIA GAS OF KENTUCKY, INC.

P.S.C. Ky. No. 5

SMALL VOLUME GAS TRANSPORTATION SERVICE (SVGTS) RATE SCHEDULE (Continued)

ACTUAL GAS COST ADJUSTMENT

Volumes delivered to all customers under this rate schedule are subject to the sum of the Refund Adjustment, SAS Refund Adjustment, Actual Cost Adjustment, Balancing Adjustment and Gas Cost Incentive Adjustment set forth on Sheet 48. A customer who is or has been receiving service under this tariff shall be responsible for this adjustment only for those months of the prior twelve months during which they were served under a sales service tariff.

LOCAL FRANCHISE FEE OR TAX

To the extent applicable, the above rates and charges are subject to Local Franchise Fee or Tax as set forth on Sheet No. 52.

LATE PAYMENT PENALTY

Late payment penalties shall apply to service under this rate schedule as provided in the General Terms, Conditions, Rules and Regulations, Section 25.

OTHER PROVISIONS

Where a Customer has installed a gas light(s) for continuous street or outdoor lighting in lighting devices approved by Company and the gas used by such light(s) is unmetered, the gas consumed by such light(s) shall be assumed to be two thousand (2,000) cubic feet per month when the Btu/hour input rating for such light(s) is 2,700 or less. For each additional 1,350 Btu/hour input or fraction thereof, the assumed consumption shall be increased by one thousand (1,000) cubic feet per month. Such assumed consumption shall be billed under the agreement Customer has with Marketer for metered consumption and shall be added to the Customer's metered usage and the total billed according to the rates contained herein.

RIGHT OF REFUSAL

Should Columbia be prohibited from assigning capacity, as specified in its Small Volume Aggregation Service Rate Schedule, for any reason whatsoever, including but not limited to directives from the Commission or any court having jurisdiction over said matters, Columbia shall have the right to refuse to accept new small volume transportation customers under this rate schedule. as of the end of the ninety (90) day notice period as set forth on Sheet No. 35.

GENERAL TERMS, CONDITIONS, RULES AND REGULATIONS

Service furnished under this Rate Schedule is subject to Columbia's General Terms, Conditions, Rules and Regulations applicable to all Rate Schedules.

DATE OF ISSUE: November 30, 2004

DATE EFFECTIVE: April 1, 2005

Issued by: Joseph W. Kelly President

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SUBSTITUTE Attachment E

Columbia Gas of Kentucky, Inc.
Calculation of Proportional 100% Load Factor Rate of assigned FTS capacity and Balancing Charge

Line No.	Description	Value			
•	100% Assigned FTS Load Factor Rate				
2 (Contracted CKT FTS/SST Capacity, Dth Contracted TCO FTS Capacity, Dth Total Contracted City Cata FTS, Dth	28,000 20,014			
3	Total Contracted City Gate FTS, Dth	48,014			
	Percentage CKT to be Assigned (1 / 3) Percentage TCO to be Assigned (2 / 3)	58.32% 41.68%			
(- - (Monthly Demand Charges, per Dth CKT FTS TCO SST @ CKT FTS rate TCO FTS Gulf FTS-1 TGP FTS-A	\$ 0.516 \$ 0.516 \$ 5.940 \$ 3.145 \$ 4.6238			
7a (7a1] 7b] 7c (Annual Demand Charges, per Dth A/ CKT FTS (5 months) TCO SST (7 months) TCO FTS Gulf FTS-1 TGP FTS-A	\$ 2.5800 \$ 3.6120 \$ 71.2800 \$ 37.7400 \$ 55.4856			
8a (Fuel Retention CKT FTS TCO FTS	1.000% 2.565%			
) ד ד (Proportional Annual Costs CKT FTS (7a * 4) TCO SST (7a1 * 4) TCO FTS (7b * 5) Gulf FTS-1 (7c * 4) / (100% - 8a) TGP FTS-A (7d * 5) / (100% - 8b)	\$ 1.5046 \$ 2.1064 \$ 29.7121 \$ 22.2309 \$ 23.7373			
10 T	Total Demand Cost of Assigned FTS, per unit	\$ 79.2913	/Dth	\$ 83.6523	/Mcf
11 1	100% Load Factor Rate (10 / 365)			\$ 0.2292	
12 8	Storage Commodity Cost Credit			\$ 0.1331	
13 N	Net Capacity Assignment Credit (11 - 12)			\$ 0.0961	
E	Salancing Charge				
	Demand Cost Recovery Factor in GCA, per Mcf per CKY Tariff Sheet No. 5 effective March 2005			\$ 1.1531	
15 E	Balancing Charge, per Mcf (14 - 13)			\$ 1.0570	

A/ TCO SST and CKT, together total 12 months.