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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of :

CONSTELLATION NEW-ENERGY-GAS DIVISION, LLC)
)
COMPLAINANT)
)
)
V.)
)
COLUMBIA GAS OF KENTUCKY, INC.)
)
DEFENDANT)

CASE NO.
2005-00184

**CONSTELLATION NEW-ENERGY-GAS DIVISION, LLC'S
MOTION TO SUPPLEMENT THE RECORD**

Constellation New-Energy-Gas Division, LLC ("CNEG) files this Motion with the Kentucky Public Service Commission requesting that the record in this case be supplemented with copies of two "Flow Letters" received by CNEG from Columbia Gas of Kentucky, Inc. ("CKY") addressing the issue of a "daily metering" designation at the time of the Daily Delivery Notice (DDN) issued by CKY on November 17, 2004.

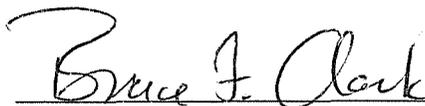
CNEG's motion is in response to the "Supplemental Post-Hearing Reply of Columbia Gas of Kentucky, Inc." filed with the Commission on September 7, 2007. In this filing, CKY represented that the Flow Letter attached to the filing was "sent to customers during the period in question." CNEG notes that the Flow Letter provided by CKY is not dated and that it appears to be a template for the Flow Letter, not an actual Flow Letter sent to a customer. Further, attached hereto are two (2) dated Flow Letters received by CNEG, on behalf of CKY's customers. Please note that the name of the customer has been removed for confidentiality reasons.

The first Flow Letter is dated August 16, 2004, issued just prior to the DDN notice of November 17, 2004. Please note that there is no entry in the location referenced by CKY as being designated "Daily or Non-Daily" (last column of the summary of key data). Rather, the column is designated as "OFO or OMO," without any reference to the significance of such designation.

The second Flow Letter is dated August 23, 2006, and it contains the "Daily or Non-Daily" designation. This is the first Flow Letter received by CNEG after the DDN notice of November 17, 2004.

For the reasons set forth herein, CNEG respectfully requests the Commission to grant its Motion to Supplement the Record with the two letters attached hereto.

Respectfully submitted,



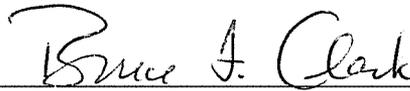
Bruce F. Clark
STITES & HARBISON, PLLC
421 West Main Street
P.O. Box 634
Frankfort, KY 40602-0634
Telephone: (502) 223-3477
COUNSEL FOR COMPLAINANT,
CONSTELLATION NEWENERGY-GAS
DIVISION, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by United States First Class Mail, postage prepaid, on this 12 day of September, 2007 upon:

Daniel A. Creekmur, Esq.
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117

Richard S. Taylor, Esq.
225 Capital Avenue
Frankfort, KY 40601



Bruce F. Clark



A NiSource Company

August 16 2004

Re: General Distribution Application & Agreement
Contract #

Dear Customer

This is to confirm that we received notice of your change in natural gas agents. The following summarizes the key data for this change

Account Number	Meter ID Number	TCO Market Area	Maximum Daily Volume In MCF	Standby Service Volume	Annual Volume In MCF	Bank Limit In MCF	Effective Billing Cycle	Nom Group #	Invoice Group #	OFF Or OMO
12970888-002	500075332	6-12	314	200	30,000	5%	9/1/2004	35294	116340	OMO
10700549-003	100348682	6-12	400	181	28,586	5%	9/1/2004	3534	14490	OMO

More information about these orders is available in the Rules Applicable to Distribution Service section of the Columbia Gas of KY tariff on our website at

www.columbiachoice.com

REP ACTION ==> CONSUMPTION HISTORY 32 2629 500075332 14/60

CUST NAME PCID 12970888 CUST 002
SERV ADDR CHECKFREE-ZIPCHECK
CITY ST KY ZIP 403919465 NON PARTICIPANT

REVENUE CLASS INDUSTRIAL

DATE	STAT	CODE	DAYS	CNSHP	MTR CHG	DATE	STAT	CODE	DAYS	CNSHP	MTR CHG
06 27 03	ACT	READ	31	9150		06 27 03	ACT	READ	31	9150	
05 26 03	ACT	READ	30	8250		05 26 03	ACT	READ	30	8250	
04 26 03	ACT	READ	33	10350		04 26 03	ACT	READ	33	10350	
03 26 03	ACT	READ	29	31160		03 26 03	ACT	READ	29	31160	
02 26 03	ACT	READ	31	61240		02 26 03	ACT	READ	31	61240	
01 27 03	ACT	READ	32	70180		01 27 03	ACT	READ	32	70180	
12 27 02	ACT	READ	32	37050		12 27 02	ACT	READ	32	37050	
11 26 02	ACT	READ	30	37460		11 26 02	ACT	READ	30	37460	
10 28 02	ACT	READ	33	11720		10 28 02	ACT	READ	33	11720	
09 28 02	ACT	READ	29	5530		09 28 02	ACT	READ	29	5530	
08 29 02	ACT	READ	32	11360		08 29 02	ACT	READ	32	11360	
07 29 02	ACT	READ	34	10660		07 29 02	ACT	READ	34	10660	

REP ACTION ==> CONSUMPTION HISTORY 32 2629 100348682 05/54

CUST NAME PCID 10700549 CUST 003
SERV ADDR CHECKFREE-ZIPCHECK
CITY ST KY ZIP NON PARTICIPANT

REVENUE CLASS INDUSTRIAL

DATE	STAT	CODE	DAYS	CNSHP	MTR CHG	DATE	STAT	CODE	DAYS	CNSHP	MTR CHG
06 27 03	ACT	READ	31	18100		06 27 03	ACT	READ	31	18100	
05 26 03	ACT	READ	29	9020		05 26 03	ACT	READ	29	9020	
04 26 03	ACT	READ	33	17100		04 26 03	ACT	READ	33	17100	
03 26 03	ACT	READ	28	21240		03 26 03	ACT	READ	28	21240	
02 26 03	ACT	READ	31	36000		02 26 03	ACT	READ	31	36000	
01 27 03	ACT	READ	32	33550		01 27 03	ACT	READ	32	33550	
12 27 02	ACT	READ	32	33850		12 27 02	ACT	READ	32	33850	
11 26 02	ACT	READ	30	22560		11 26 02	ACT	READ	30	22560	
10 28 02	ACT	READ	33	10250		10 28 02	ACT	READ	33	10250	
09 28 02	ACT	READ	29	17020		09 28 02	ACT	READ	29	17020	
08 29 02	ACT	READ	32	23230		08 29 02	ACT	READ	32	23230	
07 29 02	ACT	READ	34	17820		07 29 02	ACT	READ	34	17820	



A NiSource Company

8/23/2006

Re: General Distribution Application & Agreement
Contract #

Dear Customer:

Enclosed please find your copy of a fully executed replacement agreement with Columbia Gas of Kentucky, Inc. for distribution service. This replacement agreement was executed to update information for your account, including your requested change of agent.

The following summarizes the key data for the agreement when it was executed:

Account Number	Meter ID Number	TCO Market Area	Maximum Daily Volume In MCF	Standby Service Volume	Annual Volume In MCF	Bank Limit In MCF	Effective Billing Cycle	Nom Group #	Invoice Group #	Daily Or Non-Daily
12986603-004	100450048	3-15	65	65	13,868	5%	9/1/2006	2607	12078	Non-Daily

Operational Flow Order (OFO) or Operational Matching Order (OMO) distinction. More information about these orders is available in the Rules Applicable to Distribution Service section of the Columbia Gas of OH tariff on our website at www.columbiachoice.com.

OPER ACTION ==> CONSUMPTION HISTORY 32 2631 100450048 21/10

CUST NAME	PCID 12986603 CUST 001 5
SERV ADDR	CHECKFREE-ZIPCHECK
CITY	NON PARTICIPANT
REVENUE CLASS INDUSTRIAL	
PREM READ NO.	MTR
DATE STAT CODE DAYS CNSMP	CHG DATE STAT CODE DAYS CNSMP
07 28 06 ACT READ 31 6720	07 28 05 ACT READ 31 8960
05 28 06 ACT READ 30 7510	06 28 05 ACT READ 32 8020
05 30 06 ACT READ 34 8450	05 27 05 ACT READ 29 11260
04 27 06 ACT READ 31 7410	04 29 05 ACT READ 33 14170
03 27 06 ACT READ 29 16380	03 28 05 ACT READ 33 18900
02 27 05 ACT READ 29 15400	02 25 05 ACT READ 29 17020
01 30 06 ACT READ 32 17620	01 28 05 ACT READ 32 19710
12 29 05 ACT READ 32 17620	12 28 04 ACT READ 30 20780
11 29 05 ACT READ 33 8840	11 29 04 ACT READ 32 16260
10 28 05 ACT READ 31 8660	10 29 04 ACT READ 29 13200
09 28 05 ACT READ 30 11640	09 30 04 ACT READ 32 11110
08 30 05 ACT READ 34 10190	08 30 04 ACT READ 36 12260

Your previous and new agents have been notified of these changes should you decide to change agents in the future, please notify us by the first of the month prior to the effective flow month. If you have any questions about meter reading, consumption, or to disconnect/connect service, please call the Columbia Gas Customer Service Center at 1-800-344-4077. If you have any questions about your transportation charges or your Columbia Gas transportation agreement, please call the representative listed on your green transportation bill.

Sincerely,
Kimberly Robson
Columbia Gas Transportation & Sales Support

cc: File
Nomination Department
Constellation NewEnergy