COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ADJUSTMENT OF THE AMRP RIDER) CASE NO. OF COLUMBIA GAS OF KENTUCKY, INC.) 2010-00143

INITIAL DATA REQUEST OF COMMISSION STAFF TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. ("Columbia"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than May 6, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Columbia shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Columbia fails or refuses to furnish all or part of the requested information,

Columbia shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied 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.

- 1. Refer to Columbia's application, AMRP Form 1.0.
- a. Provide calculations producing the billing determinants for each of the Rate Schedules shown in the column labeled "Billing Determinant # of Bills."
- b. Explain why Columbia is using projected billing determinants for the 12 months ending May 31, 2011 in its Accelerated Main Replacement Program ("AMRP") Rider calculation instead of the billing determinants from Case No. 2009-00141. Provide the calculation of the Monthly AMRP Riders for each Rate Schedule if Case No. 2009-00141 billing determinants were used.
- c. Explain why the Rate Schedules are grouped as they are on AMRP Form 1.0 to calculate the Monthly AMRP Rider instead of being calculated separately for each Rate Schedule as shown in the response to Item 14.c. of Commission Staff's Second Data Request ("Staff's Second Request"), Attachment 1, page 1 of 6, in Case No. 2009-00141. Provide the resulting calculations for each Rate Schedule calculated separately.

¹ Case No. 2009-00141, Application of Columbia Gas of Kentucky, Inc. for an Adjustment in Rates (Ky. PSC Oct. 26, 2009).

- 2. Refer to Line 1, Column 6, on AMRP Form 2.0.
- a. Provide a breakdown of the 2009 additions to Account 376.25, Mains-AMRP, showing the length of pipe for each size of pipe installed.
- b. For each size of pipe installed, as identified in the response to part a. of this request, provide a breakdown of the installed cost showing separately the cost of materials, the cost of labor, and any other non-materials items.
 - 3. Refer to Line 3, Column 6, on AMRP Form 2.0.
- a. Provide a breakdown of the 2009 additions to Account 380.25, Service Lines, showing the length of pipe for each size of pipe installed.
- b. For each size of pipe installed, as identified in the response to part a. of this request, provide a breakdown of the installed cost showing separately the cost of materials, the cost of labor, and any other non-materials items.
- 4. Refer to Lines 2, 4, and 5, in Column 6 on AMRP Form 2.0. Provide a general discussion of the circumstances and conditions that necessitate replacing plant regulators, meter installations, and house regulators on an accelerated basis.
- 5. In Case No. 2009-00141, Mr. David E. Mueller testified that the Lexington and Frankfort systems have more unprotected steel pipe than other parts of Columbia's system. He also testified to the efficiencies of an area-based replacement strategy and the benefits of undertaking larger-scale projects.
- a. Identify generally, the locations of the major main replacements that occurred in 2009 and describe how those specific projects were selected and prioritized.

b. Explain, generally, if the size of the 2009 main replacement projects permitted Columbia to leverage materials purchases, obtain the best contractor costs, and acquire land and right-of-way more cost effectively as described by Mr. Mueller.

Jeff Derouen

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, Kentucky 40602

DATED APR 2 2 2010

cc: Parties of Record

Stephen B Seiple Assistant General Counsel Columbia Gas of Kentucky, Inc. 2001 Mercer Road P. O. Box 14241 Lexington, KY 40512-4241

Richard S Taylor 225 Capital Avenue Frankfort, KY 40601