

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In The Matter Of:

AN INVESTIGATION OF NATURAL GAS)	CASE NO.
RETAIL COMPETITION PROGRAMS)	2010-00146

**SECOND REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY
MINISTRIES TO COLUMBIA GAS OF KENTUCKY, INC.**

Pursuant to the Procedural Order issued in this matter on June 8, 2010, Association of Community Ministries (“ACM”), by counsel, requests the response of Columbia Gas of Kentucky, Inc. (“Columbia”) to the following Requests for Information.

GENERAL INSTRUCTIONS

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (4) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.
- (5) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature of and legal basis for the privilege asserted.
- (6) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

REQUESTS FOR INFORMATION

1. Please refer to Columbia's response to Request No. 1 of ACM's First Requests for Information, wherein Judy M. Cooper states that "[t]he goals of the program were revised in 2004 coincident with changes to the program design" and that a revised goal was to "provide for reduced gas prices and/or more stable prices...."

(a) Please describe the particular "changes to the program design" related to the decision to make this particular change in the program goals.

(b) For each change to program design described in response to (a), above, please explain the basis for Columbia's decision to make such change.

2. Please continue to refer to Columbia's response to Request No. 1 of ACM's First Requests for Information. Would Columbia agree that the goal to "provide an opportunity for reduced gas prices and/or more stable gas prices...." would be met in the case of a low-income residential CHOICE customer whose gas prices were higher but more stable than they would have been had that customer continued to purchase gas from Columbia?

3. Please refer to Columbia's response to Request No. 5 of ACM's First Requests for Information, wherein, by reference to its response to "AARP Data Set 1 DR No. 001(b)," Columbia provided the figure for the cumulative cost incurred by the customers who have chosen competitive supplies over what they would have paid had they remained with Columbia as their gas supplier. Please provide the following information sought in Request No 5 of ACM's First Requests for Information:

(a) The amount that residential CHOICE customers in the aggregate have paid for natural gas over the life of the CHOICE program; and

(b) The amount that residential CHOICE customers in the aggregate would have paid over the life of the CHOICE program had they purchased their gas from Columbia.

4. Please refer to Columbia's response to Request No. 6 of ACM's First Requests for Information.

(a) To what does Columbia attribute the decline in CHOICE participation by residential customers shown therein?

(b) Please explain the basis, including but no limited to any data or other empirical evidence, of the conclusions discussed in response to (a), above.

5. Please refer to Columbia's response to Request No. 9 of ACM's First Requests for Information.

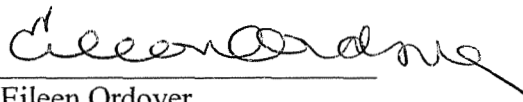
(a) Please explain why Columbia does not have the requested statistics concerning billing inquiries to Columbia's Customer Contact Center for years prior to 2004.

(b) Please provide any statistics Columbia does have indicating the volume of billing inquiries by residential customers received for each year of the period 1999 through 2001.

(c) Please state Columbia's residential customer base for each of the years 1999 and 2000.

6. Please refer to Columbia's response to Request No. 2 of the First Information Request of Commission Staff, wherein it is stated that transition and stranded costs identified in the early years of the Choice program included consumer education costs and totaled approximately \$32,708,000. How much of this total represents expenditures for consumer education?

Respectfully submitted,



Eileen Ordovery

Lisa Kilkelly

LEGAL AID SOCIETY, INC.

416 West Muhammad Ali Blvd. Suite 300

Louisville, Kentucky 40202

(502) 584-1254

Attorneys for ACM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Second Request For Information Of Association Of Community Ministries To Columbia Gas Of Kentucky, Inc. was served on the following parties on the 19th day of August, 2010 by United States mail, postage prepaid.



Eileen Ordover

Lonnie E Bellar
Vice President, State Regulation
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

Rocco D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East 4th Street, R. 25 At II
P. O. Box 960
Cincinnati, OH 45201

Stephen Bennett
Retail Policy Manager - East/Midwest
Exelon Power Team
300 Exelon Way
Kennett Square, PA 19348

John M Dosker
General Counsel
Stand Energy Corporation
1077 Celestial Street
Building 3, Suite 110
Cincinnati, OH 45202-1629

John B Brown
Chief Financial Officer, Treasurer
Delta Natural Gas Company, Inc.
3617 Lexington Road
Winchester, KY 40391

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

Judy Cooper
Columbia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

Thomas J Fitzgerald
Counsel & Director
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KY 40602

Katherine K Yunker
John B. Park
Yunker & Park, PLC
P.O. Box 21784
Lexington, KY 40522-1784

Michael T. Griffiths, Esq.
ProLiance Energy, LLC
111 Monument Circle, Suite 2200
Indianapolis, IN 46204-0000

Sandra Minch Guthorn
Senior Counsel Regulatory Affairs
MXEnergy Inc
100 10 Junction Drive. Suite 104-S
Annapolis Junction, MD 20701

Brooke E Leslie
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117

Matthew R Malone
Attorney at Law
Hurt, Crosbie & May PLLC
The Equus Building
127 West Main Street
Lexington, KY 40507

Mark Martin
VP Rates & Regulatory Affairs
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

Tracy McCormick
Executive Director
Retail Energy Suppliers Association
P.O. Box 6089
Harrisburg, PA 17112

Teresa Ringenbach, Manager
Government & Regulatory Affairs-MW
Direct Energy, LLC
9605 El Camino Lane
Plain City, OH 43064

Stephen R. Seiple, Esq.
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, Ohio 43216-01 17

Lisa M. Simpkins
V.P.-Energy Policy, Natural Gas
Constellation Energy Resources
111 Market Place, Suite 500
Baltimore, MD 21403

Iris G Skidmore
Bates and Skidmore
415 W. Main Street, Suite 2
Frankfort, KY 40601

Robert M. Watt, III
Stoll Keenon Ogden
300 W. Vine St.
Suite 2100
Lexington, KY 40507