

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                |   |            |
|--------------------------------|---|------------|
| MICHAEL L. PAWLEY              | ) |            |
|                                | ) |            |
| COMPLAINANT                    | ) |            |
|                                | ) |            |
| V.                             | ) | CASE NO.   |
|                                | ) | 2022-00019 |
|                                | ) |            |
| COLUMBIA GAS OF KENTUCKY, INC. | ) |            |
|                                | ) |            |
| DEFENDANT                      | ) |            |

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, is to file with the Commission an electronic version of the following information. The information requested is due on July 18, 2022. The Commission directs Columbia Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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).

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 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 when made or, though correct when made, is now incorrect 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 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 Commission Staff's First Request for Information (Staff's First Request), Items 1(a–e).

- a. Explain what other "tracker" type filings made by Columbia Kentucky are being referenced in the response. Also, provide the most recent case number related to each of the "tracker" type filings referenced.

b. Explain in detail why base rate changes are considered by Columbia Kentucky to be necessary to be effective with service on and after a date while “tracker” type filings with a true-up mechanism do not.

2. Refer to Columbia Kentucky’s Gas Cost Recovery (GCR) rate report filing in Case No. 2021-00403,<sup>2</sup> Actual Cost Adjustment (ACA), Schedule No. 2, Sheet 1 of 3.

a. Explain why Columbia Kentucky based the computation of the ACA for this GCR rate report on the three months ended August 31, 2021.

b. Refer to the months of June, July, and August 2021. For each month, provide the accounting start and end date for the period used in the calculation of the ACA.

c. Refer to the months of June, July, and August 2021. For each month, provide the meter reading start and end dates used in the calculation of the ACA.

d. Explain how Columbia Kentucky gathers and reports the data for each month in the column titled “Total Sales Volumes Per Books Mcf (1)”. Provide the start and end dates for each month used in the calculation of the ACA.

e. Explain whether the column titled “Cost of Gas Purchased \$ (9)” is based on the cost of natural gas purchased by Columbia Kentucky during each month of the ACA period. If not, then explain how Columbia Kentucky gathers and reports the data for each month in the column.

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<sup>2</sup> Case No. 2021-00403, *Electronic Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.* (filed Nov. 2, 2021), Amended and Revised Application.

f. Provide the Expected Gas Cost rate and the Case Number in which it was approved by the Commission that was in effect for the period used in the calculation of the ACA.

3. Refer to Columbia Kentucky's Gas Cost Recovery (GCR) rate report filing in Case No. 2021-00403, Actual Cost Adjustment (ACA), Schedule No. 2, Sheet 3 of 3. Provide a detailed explanation for how the Gas Cost Uncollectible Charge is calculated.

4. Refer to Columbia Kentucky's Gas Cost Recovery (GCR) rate report filing in Case No. 2021-00403, Balancing Adjustment (BA), Schedule No. 3, page 1 of 5. The top of the page states, "Calculation of Balancing Adjustment to be effective December 1, 2021." State if this was an error.

5. Refer to Columbia Kentucky's Gas Cost Recovery (GCR) rate report filing in Case No. 2021-00403, Balancing Adjustment (BA), Schedule No. 3, page 2 of 5.

a. Provide the date when Columbia Kentucky began to include on customer bills the GCR rate approved by the Commission in Case No. 2021-00184.<sup>3</sup>

b. Provide the date when Columbia Kentucky stopped including on customer bills the GCR rate approved by the Commission in Case No. 2021-00184.

c. Under "Case No. 2021-00184" the sheet states, "Expires: September 30, 2021." The Commission approved a new GCR rate for rates effective August 29, 2021, in Case No. 2021-00308.<sup>4</sup> Explain why the BA rate of \$0.1892 per Mcf approved

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<sup>3</sup> Case No. 2021-00184, *Electronic Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC May 14, 2021).

<sup>4</sup> Case No. 2021-00308, *Electronic Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC Aug. 17, 2021).

in Case No. 2021-00184 appears to be charged to customers past the date in which a new GCR rate was approved.

d. For each month listed under “Beginning Balance” provide the start and end date for the volumes reported.

6. Refer to Columbia Kentucky’s Gas Cost Recovery (GCR) rate report filing in Case No. 2021-00403, Balancing Adjustment (BA), Schedule No. 3, page 3 of 5.

a. Provide the date when Columbia Kentucky began to include on customer bills the GCR rate approved by the Commission in Case No. 2020-00253.<sup>5</sup>

b. Provide the date when Columbia Kentucky stopped including on customer bills the GCR rate approved by the Commission in Case No. 2020-00253.

c. Under “Case No. 2020-00253” the sheet states, “Expires: September 30, 2021.” The Commission approved a new GCR rate for rates effective August 29, 2021, in Case No. 2021-00308. Explain why the ACA rate of (\$0.2354) per Mcf approved in Case No. 2020-00253 appears to be charged to customers past the date in which a new GCR rate was approved.

d. For each month listed under “Beginning Balance” provide the start and end date for the volumes reported.

7. Refer to Columbia Kentucky’s Tariff Sheet No. 48 and Sheet No. 49. Provide Columbia Kentucky’s own interpretations or definitions of the following terms used in Columbia Kentucky’s Gas Cost Adjustment Clause Tariff. To assist in the

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<sup>5</sup> Case No. 2020-00253, *Electronic Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC Aug. 20, 2020).

response, Columbia Kentucky shall provide examples to better explain each interpretation as they relate to the Columbia Kentucky's GCR rate report in Case No. 2021-00403.

- a. "billing cycle"
- b. "final meter readings"
- c. "reporting period"
- d. "accounting period"
- e. "quarterly calendar period"
- f. "effective with service on and after"
- g. "effective with billings on and after"
- h. "effective for billing with the final meter readings of the first billing cycle of each calendar quarter period"

8. Refer to Columbia Kentucky's Tariff Sheet No. 49. Also, refer to Columbia Kentucky's GCR rate report filing in Case No. 2021-00403, ACA, Schedule No. 2. Columbia Kentucky's Gas Cost Adjustment Clause Tariff defines reporting period as "the three month accounting period that ended approximately thirty (30) days prior to the filing date of the updated gas recovery rates, i.e. the three months ended June 30<sup>th</sup>, September 30<sup>th</sup>, December 31<sup>st</sup>, and March 31<sup>st</sup> each year." Columbia Kentucky's GCR rate report calculates the ACA based on the three months ended August 31, 2021. Explain how Columbia Kentucky's true-up mechanism is based on the use of the reporting period as defined in Tariff Sheet No. 49.



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DATED JUN 30 2022

cc: Parties of Record

Case No. 2022-00019

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