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July 18, 2022

ELECTRONICALLY FILED

Linda Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602-0605

RECEIVED

JUL 18 2022

PUBLIC SERVICE
COMMISSION

RE: KY PSC Case Nos. 2022-00019 READ FIRST

Dear Ms. Bridwell,

Please find attached and accept for filing the Response of Columbia Gas of Kentucky, Inc. to the Commission's Staff's Request for Information in the above-referenced matter. I certify that the electronically filed documents are a true and accurate copy of the paper copy that was sent to the Complainant in this matter via US Postal Service on this date.

Sincerely,

/s/ Joseph M. Clark

Joseph M. Clark
Assistant General Counsel
Enclosure(s)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response was served upon all parties of record by regular U.S. Mail this 18th day of July 2022.

/s/ Joseph M. Clark

Joseph M. Clark

Attorney for

COLUMBIA GAS OF KENTUCKY, INC.

SERVICE LIST

Michael L. Pawley
96 Lantern Way
Nicholasville, Kentucky 40356

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED JUNE 30, 2022

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.

Response:

a. In addition to Gas Cost Adjustment ("GCA") also known as Purchased Gas Cost Adjustment ("PGA") filings, Columbia's other "tracker" type filings are the Rider for Natural Gas Research and Development ("R&D"), the Energy Efficiency and Conservation Program ("EECP") Rider and the Safety Modification and

Replacement Program (“SMRP”) Rider. The most recent case number associated with each of these periodic adjustment filings is shown below.

Name	Most Recent Case	Additional Notes
GCA	2022-00127	
R&D	2021-00183	Last revision was TFS 2022-30
EECP	2018-00044	Last revision was TFS 2021-537
SMRP	2021-00183	

b. The effective date of a rate change is established by Commission Order and Commission approved tariffs. Commission Orders approving changes in base rates are typically worded, “for service rendered on and after” a date certain without any other description. Rate changes pursuant to Commission approved tariffs for “tracker” mechanisms, wherein the meaning of how rate changes are to be implemented is explained, are implemented accordingly.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED JUNE 30, 2022

2. Refer to Columbia Kentucky's Gas Cost Recovery (GCR) rate report filing

in Case No. 2021-00403,¹ 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.

¹ Case No. 2021-00403, *Electronic Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.* (filed Nov. 2, 2021), Amended and Revised Application

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.

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.

Response:

a. The computation of the ACA for the December GCA is pursuant to the Commission’s Order in Case No. 2016-00060 dated February 29, 2016. In that case, the Commission approved the ACA periods be based as follows: the three months ending February, with the ACA factor to be in effect for twelve months beginning with June billing; the three months ending May, with the ACA factor to be in effect for twelve months beginning with September billing; the three months ending August, with the ACA factor to be in effect for twelve months beginning with December billing; and the three months ending November, with the ACA factor to be in effect for twelve months beginning with March billing².

b. The accounting periods are June, July and August. Refer to PSC Set 2, No. 7 – Attachment A which includes a view of the various billing units for these three months. The gas cost

² Case No. 2016-00060, Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc., Response to Staff’s First Request, Item I.d., and Order dated February 29, 2016, page 4, paragraph 13.

data used to create the ACA is actual gas costs recorded for the calendar months of June, July and August. The actual recoveries reflect the billed amounts as recorded in June, July and August based on the sum of the June, July, August Unit billing cycle amounts.

- c. Refer to PSC Set 2, No. 7 Attachment A & B. The Gas Cost Adjustment Order rates for June billings was effective with final meter readings beginning May 29, 2021. This Order approval date was after the June Unit 1 billing meter read date, so the new rate was effective for the June Unit 2 billing. Attachment B indicates the ending meter read dates for each billing unit in August.
- d. Columbia Kentucky used the billed volumes in response (b) above.
- e. Columbia confirms, 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.
- f. The Expected Gas Cost rate that was approved in Case No. 2021-00184, and in effect for the period used in the ACA calculation was \$4.9142 per Mcf.

COLUMBIA GAS OF KENTUCKY, INC.
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DATED JUNE 30, 2022

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.

Response:

The "Total Actual Cost" is calculated by multiplying the Total Commodity Cost of Gas by the Uncollectible Rate (rate as approved in the Base Rate Case No. 2016-00162).

The "Total Actual Recovery" is the product of the billed volumes multiplied by the Gas Cost Uncollectible Rider rate.

The difference between the "Total Actual Cost" and "Total Actual Recovery" is the (Over)/Under Collection Activity.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED JUNE 30, 2022

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.

Response:

The statement "Calculation of Balancing Adjustment to be effective December 1, 2021", is not an error. Please refer to Response to Staff's Data Request Set One No. 1 subpart g, and Response to Staff's Data Request Set Two No. 2 subpart a. The ACA periods and Balancing Adjustment ("BA") periods are in accordance with Columbia's Tariff and the Commission's Order wherein the periods were defined. The Commission's February 29, 2016 Order in Case No. 2016-00060 defined the periods and stated, " The ACA and BA reporting periods provided in response to Staffs First Request, Item l.d., which coincide with Columbia's Quarterly Calendar Periods as set out in the Definition section of its GCA tariff, are reasonable and should be approved"¹.

¹¹¹ Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc., Case No. 2016-00060, page 4, paragraph 13.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED JUNE 30, 2022

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. 2021-00184.¹

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. 2021-00308.² Explain why the BA rate of \$0.1892 per Mcf approved in Case No. 2021-00184 appears to be charged to customers past the date in which a new GCR rate was approved.

¹ Case No. 2021-00184, *Electronic Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC May 14, 2021).

² Case No. 2021-00308, *Electronic Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC Aug. 17, 2021)

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

Response:

- a. Columbia began billing the Commission approved current quarter Balancing Adjustment in GCR Case No. 2021-00184 on May 29, 2021 with the June Unit 2 billings. The Order approving the rates in this filing made the effective date May 29, or one day after the new month billing units were processed. So the Unit 1 June bills did not have the new rates in the bill calculations, rather continued billing with the prior quarter GCR rates. The current quarter Balancing Adjustment rate was to be effective for three billing months, or through Unit 21 August 2021 billing.
- b. Columbia stopped billing the current quarter Balancing Adjustment the Commission approved in GCR Case No. 2021-00184 on August 26, 2021 with August Unit 21 processing.
- c. The BA rate of \$.1892 per Mcf was not charged to the customers past the date in which the new GCR rate was approved. The “Expires: September 30, 2021” allows for all the billing units to complete their cycles with actual data as it relates to the Accounting Period.
- d. The information relates to the 3 months ended August 2021 accounting periods. The September reference and volumes reflect adjustment from Columbia’s process to bill Rate Schedule GTS customers for August business. Rate Schedule GTS is a non-residential rate schedule. This is done to ensure the 3 month ended data reflects actual customer billing amounts and not estimates.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED JUNE 30, 2022

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. 2020-00253.¹

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.

¹ Case No. 2020-00253, *Electronic Purchased Gas Adjustment Filing of Columbia Gas of Kentucky, Inc.* (Ky. PSC Aug. 20, 2020).

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

Response:

- a. Columbia began billing the current quarter ACA amount of (\$0.2354) calculated in the Commission approved GCR Case No. 2020-00253 on August 27, 2020 (Unit 1 September). The rate was to be effective for 12 billing months, effectively Unit 1 of September 2020 through Unit 21 of August 2021.
- b. Columbia stopped billing the current quarter ACA amount of (\$0.2354) calculated in the Commission approved GCR Case No. 2020-00253 on August 28, 2021.
- c. The ACA rate of (\$0.2354) per Mcf was not charged to the customers past the date in which the new GCR rate was approved. The “Expires: September 30, 2021” allows for all the billing units to complete their cycles with actual data as it relates to the Accounting Period.
- d. The information relates to the 12 months ended August 2021 accounting periods. The September expiration reference and volumes reflect adjustments from Columbia’s process to bill Rate Schedule GTS customers for August business. Rate Schedule GTS is a non-residential rate schedule. This is done to ensure the 12 months ended August 2021 data reflected actual customer billing amounts.

To further explain, the Gas Transportation Billing system requires several days to correctly bill customers served under Rate Schedule GTS. Columbia must obtain information on volumes delivered to its system on behalf of each customer and compare that to the customer’s metered consumption and corresponding bank balance for each

customer. These billing validation processes are not completed within the cycle accounting uses to report monthly activity. Therefore, an estimate is used for revenues and usage associated with these customers for the current month accounting activity. A true-up that replaces the estimates with actual is recorded in the month following. The September data referenced is adjusting the August estimate to actual. It does not mean that the ACA rate continued through September 30, 2021.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
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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 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”

Response:

Please refer to 2022-00019 PSC Set 2 No. 7 Attachment A and B for information regarding the Company’s billing process. Both Attachments provide details regarding the 2021 meter schedule with Attachment A portraying the information graphically and Attachment B in a table form.

Customers are assigned into one of 21 different billing units. Referring to Attachment B, customers in billing unit 1 have meter read dates as follows:

Accounting Period	Unit 1
Jan 2021	12/30/2020
Feb 2021	1/29/2021
Mar 2021	3/1/2021
April 2021	3/30/2021
May 2021	4/29/2021
June 2021	5/28/2021
July 2021	6/29/2021
Aug 2021	7/29/2021
Sept 2021	8/27/2021
Oct 2021	9/28/2021
Nov 2021	10/27/2021
Dec 2021	11/29/2021
Jan 2022	12/30/2021

For the February Unit 1 billing, the beginning meter read date is 12/30/20 and the ending meter read date is 1/29/21. Unit 2 meter read dates are completed the next business day following Unit 1 meter read dates as follows:

Accounting Period	Unit 2
Jan 2021	12/31/2020
Feb 2021	2/1/2021
Mar 2021	3/2/2021
April 2021	3/31/2021
May 2021	4/30/2021
June 2021	6/1/2021
July 2021	6/30/2021
Aug 2021	7/30/2021
Sept 2021	8/30/2021
Oct 2021	9/29/2021
Nov 2021	10/28/2021
Dec 2021	11/30/2021
Jan 2022	1/3/2022

The February Unit 2 beginning meter read date is 12/30/20 and the ending meter read date is 2/1/21. The process continues for all 21 billing units, each with a meter read date on the next business day following the preceding billing unit. Then the process starts over for the Unit 1 billing for the next month.

Billing Cycle – synonymous with Billing Unit.

Final Meter Readings – the date the customer meter is read. The meter read dates vary each month by billing unit as depicted in Attachments A & B.

Reporting Period – the three-month accounting period that ended approximately thirty days prior to the filing date of the updated gas cost recovery rates, i.e. the three months ended June 30, September 30, December 31 and March 31 each year.

Accounting Period – reflects one or a combination of calendar months.

Quarterly Calendar Period – four three-month periods of (1) September through November, (2) December through February, (3) March through May, and (4) June through August.

Effective with service on and after – the newly approved rate is utilized in billing calculations for services starting at the effective date of the tariff. A bill that includes dates prior to and after the effective date of the change requires proration for partial month calculations – one priced at the prior approved billing rate for volumes prior to the rate change and one priced at the newly approved billing rate for volumes after the rate change. Proration is determined by the service days and heating degree days associated with the service day.

Effective with billings on and after - the new rate is used for bill calculation beginning on and after the specified date. No proration is required.

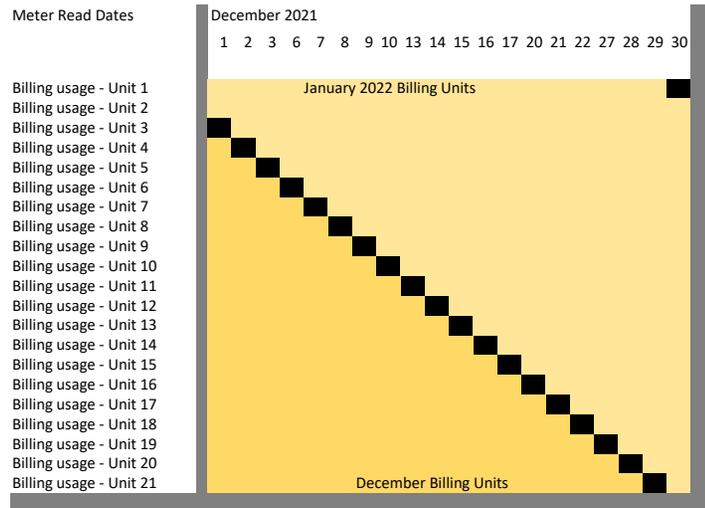
Effective for billing with the final meter readings of the first billing cycle of each calendar quarter period - the new rate is used for the monthly bill calculation beginning with Unit one of the billing months March, June, September and December. As detailed in Columbia's Response to Staff's Data Request Set 2, No. 7, the start date of a billing month or accounting period, does not necessarily align with the first calendar date of the referenced billing month or accounting period. No proration is required.

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Meter Read Dates

Billing usage - Unit 1
Billing usage - Unit 2
Billing usage - Unit 3
Billing usage - Unit 4
Billing usage - Unit 5
Billing usage - Unit 6
Billing usage - Unit 7
Billing usage - Unit 8
Billing usage - Unit 9
Billing usage - Unit 10
Billing usage - Unit 11
Billing usage - Unit 12
Billing usage - Unit 13
Billing usage - Unit 14
Billing usage - Unit 15
Billing usage - Unit 16
Billing usage - Unit 17
Billing usage - Unit 18
Billing usage - Unit 19
Billing usage - Unit 20
Billing usage - Unit 21

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Columbia Gas of Kentucky
 2021 Meter Reading Schedule
 Dates reflects the beginning of the Billing Units

Accounting Period	Unit 1	Unit 2	Unit 3	Unit 4	Unit 5	Unit 6	Unit 7	Unit 8	Unit 9	Unit 10	Unit 11
Jan 2021	12/30/2020	12/31/2020	1/4/2021	1/5/2021	1/6/2021	1/7/2021	1/8/2021	1/11/2021	1/12/2021	1/13/2021	1/14/2021
Feb 2021	1/29/2021	2/1/2021	2/2/2021	2/3/2021	2/4/2021	2/5/2021	2/8/2021	2/9/2021	2/10/2021	2/11/2021	2/12/2021
Mar 2021	3/1/2021	3/2/2021	3/3/2021	3/4/2021	3/5/2021	3/8/2021	3/9/2021	3/10/2021	3/11/2021	3/12/2021	3/15/2021
April 2021	3/30/2021	3/31/2021	4/1/2021	4/5/2021	4/6/2021	4/7/2021	4/8/2021	4/9/2021	4/12/2021	4/13/2021	4/14/2021
May 2021	4/29/2021	4/30/2021	5/3/2021	5/4/2021	5/5/2021	5/6/2021	5/7/2021	5/10/2021	5/11/2021	5/12/2021	5/13/2021
June 2021	5/28/2021	6/1/2021	6/2/2021	6/3/2021	6/4/2021	6/7/2021	6/8/2021	6/9/2021	6/10/2021	6/11/2021	6/14/2021
July 2021	6/29/2021	6/30/2021	7/1/2021	7/2/2021	7/6/2021	7/7/2021	7/8/2021	7/9/2021	7/12/2021	7/13/2021	7/14/2021
Aug 2021	7/29/2021	7/30/2021	8/2/2021	8/3/2021	8/4/2021	8/5/2021	8/6/2021	8/9/2021	8/10/2021	8/11/2021	8/12/2021
Sept 2021	8/27/2021	8/30/2021	8/31/2021	9/1/2021	9/2/2021	9/3/2021	9/7/2021	9/8/2021	9/9/2021	9/10/2021	9/13/2021
Oct 2021	9/28/2021	9/29/2021	9/30/2021	10/1/2021	10/4/2021	10/5/2021	10/6/2021	10/7/2021	10/8/2021	10/11/2021	10/12/2021
Nov 2021	10/27/2021	10/28/2021	10/29/2021	11/1/2021	11/2/2021	11/3/2021	11/4/2021	11/5/2021	11/8/2021	11/9/2021	11/10/2021
Dec 2021	11/29/2021	11/30/2021	12/1/2021	12/2/2021	12/3/2021	12/6/2021	12/7/2021	12/8/2021	12/9/2021	12/10/2021	12/13/2021
Jan 2022	12/30/2021	1/3/2022	1/4/2022	1/5/2022	1/6/2022	1/7/2022	1/10/2022	1/11/2022	1/12/2022	1/13/2022	1/14/2022

Columbia Gas of Kentucky
 2021 Meter Reading Schedule
 Dates reflects the beginning of the Billing Units

Accounting Period	Unit 12	Unit 13	Unit 14	Unit 15	Unit 16	Unit 17	Unit 18	Unit 19	Unit 20	Unit 21
Jan 2021	1/15/2021	1/18/2021	1/19/2021	1/20/2021	1/21/2021	1/22/2021	1/25/2021	1/26/2021	1/27/2021	1/28/2021
Feb 2021	2/15/2021	2/16/2021	2/17/2021	2/18/2021	2/19/2021	2/22/2021	2/23/2021	2/24/2021	2/25/2021	2/26/2021
Mar 2021	3/16/2021	3/17/2021	3/18/2021	3/19/2021	3/22/2021	3/23/2021	3/24/2021	3/25/2021	3/26/2021	3/29/2021
April 2021	4/15/2021	4/16/2021	4/19/2021	4/20/2021	4/21/2021	4/22/2021	4/23/2021	4/26/2021	4/27/2021	4/28/2021
May 2021	5/14/2021	5/17/2021	5/18/2021	5/19/2021	5/20/2021	5/21/2021	5/24/2021	5/25/2021	5/26/2021	5/27/2021
June 2021	6/15/2021	6/16/2021	6/17/2021	6/18/2021	6/21/2021	6/22/2021	6/23/2021	6/24/2021	6/25/2021	6/28/2021
July 2021	7/15/2021	7/16/2021	7/19/2021	7/20/2021	7/21/2021	7/22/2021	7/23/2021	7/26/2021	7/27/2021	7/28/2021
Aug 2021	8/13/2021	8/16/2021	8/17/2021	8/18/2021	8/19/2021	8/20/2021	8/23/2021	8/24/2021	8/25/2021	8/26/2021
Sept 2021	9/14/2021	9/15/2021	9/16/2021	9/17/2021	9/20/2021	9/21/2021	9/22/2021	9/23/2021	9/24/2021	9/27/2021
Oct 2021	10/13/2021	10/14/2021	10/15/2021	10/18/2021	10/19/2021	10/20/2021	10/21/2021	10/22/2021	10/25/2021	10/26/2021
Nov 2021	11/11/2021	11/12/2021	11/15/2021	11/16/2021	11/17/2021	11/18/2021	11/19/2021	11/22/2021	11/23/2021	11/24/2021
Dec 2021	12/14/2021	12/15/2021	12/16/2021	12/17/2021	12/20/2021	12/21/2021	12/22/2021	12/27/2021	12/28/2021	12/29/2021
Jan 2022	1/17/2022	1/18/2022	1/19/2022	1/20/2022	1/21/2022	1/24/2022	1/25/2022	1/26/2022	1/27/2022	1/28/2022

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S SECOND REQUEST FOR INFORMATION
DATED JUNE 30, 2022

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 30th, September 30th, December 31st, and March 31st 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.

Response: Please see response to PSC 2-2 (a.). When the quarterly periods were established in Case No. 2016-00060 for the transitions as ordered, the interpretation of the periods on Tariff Sheet No. 49 were understood by the parties at that time and no revisions were required, only Tariff Sheet No. 48 required revision.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
MICHAEL L. PAWLEY,)
) Case No. 2022-00019
COMPLAINANT)
)
v.)
COLUMBIA GAS OF KENTUCKY, INC.)
)
DEFENDANT)
)

VERIFICATION OF JUDY COOPER

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF FAYETTE)

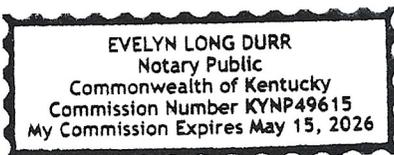
Judy Cooper, Director of Regulatory Affairs of Columbia Gas of Kentucky, Inc., being duly sworn, states that she has supervised the preparation of responses to the Commission Staff's Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.



Judy Cooper

The foregoing Verification was signed, acknowledged and sworn to before me this 18th day of July, 2022, by Judy Cooper.





Notary Commission No. KYNP49615
Commission expiration: 05/15/2026