



June 13, 2016

Mr. Aaron Greenwell
Acting Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

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PUBLIC SERVICE
COMMISSION

Re: Columbia Gas of Kentucky, Inc.
PSC Case No. 2012-00428

Dear Mr. Greenwell,

In compliance with the Commission's Order of April 13, 2016, attached are the responses of Columbia Gas of Kentucky Inc. ("Columbia"). Columbia has responded only to those items that it determined were applicable to it, and not related solely to electric utilities. Should you have any questions about this filing, please contact me at 614-460-4648 or sseiple@nisource.com. Thank you.

Very truly yours,

A handwritten signature in cursive script that reads "Stephen B. Seiple (J.G.C.)".

Stephen B. Seiple
Assistant General Counsel

Case No. 2012-00428
RESPONSES OF COLUMBIA GAS OF KENTUCKY, INC
TO THE COMMISSION'S ORDER OF APRIL 13, 2016

2. The Joint Utilities shall develop policies and procedures that provide customers access to historical information regarding their energy use and tariff rate and shall endeavor to provide this information to customers in as close to real-time as practical. Furthermore, the Joint Utilities shall provide aggregated information to CAC upon its reasonable request.

RESPONSE: Columbia provides 13-month historical usage information on its customer bills and tariff rate information upon request. The information is also available online at www.columbiagasky.com with specific customer information available by logging into the individual customer account. Columbia makes every effort to provide CAC with information upon its reasonable request.

3. The Joint Utilities shall develop internal policies and procedures governing customer privacy, customer education, and cybersecurity as set forth in this Order.

RESPONSE: Columbia maintains internal policies and procedures governing customer privacy, customer education and cybersecurity and provides employee training on its

policies and procedures. Columbia's automated meter reading is a wireless meter reading technology and does not utilize smart meters.

4. Within 60 days of the date of this Order, the Joint Utilities shall file with the Commission their internal procedures governing customer privacy and customer education.

RESPONSE: Attached hereto is a copy of Columbia's internal procedure on Information Security and Privacy and its Customer Privacy Statement, which is also available on its website www.columbiagasky.com. Columbia's website also contains customer education information regarding natural gas safety, service, energy efficiency and its utilization of automated meter reading technology which is also attached hereto.

5. Within 60 days of the date of this Order, the Joint Utilities shall certify to the Commission that they have developed internal cybersecurity procedures.

RESPONSE: Please see attached attestation of Herbert A. Miller, Jr., President. Columbia presented its internal procedures in May 2013 and in a Chairman's Forum. Columbia is again available at the Commission's request.



POLICY SUBJECT: Information Security and Privacy

EFFECTIVE DATE: June 14, 2010

REVISED: May 9, 2016

Policy

Information assets are critical to the business of NiSource Inc. and its subsidiaries (collectively, the "Company"). It is the policy of the Company to carefully guard and protect those critical assets.

Information assets consist of information about our customers, employees, products, services, competitors, technology, strategies, finances and other areas of the Company's business. In most cases, information assets are intended to be used only for the Company's business and are not intended to be generally distributed to a wider audience. Much of this information is intended to be shared with only a limited audience within the Company. The audience might be larger or smaller depending on the type of information. In some cases, applicable law imposes obligations on the Company as to what we can do with certain data or how it must be protected. Information that is personally identifiable to an individual falls within this latter category.

Scope

The Company's Information Security and Privacy Policy ("Policy") has been developed to identify and bring together the Company's efforts to classify information assets relative to their sensitivity and to ensure the appropriate level of security, integrity, privacy and confidentiality. Specifically, the Company's objectives are to:

- i. promote safe and efficient use of information assets;
- ii. classify data types and map the appropriate level of privacy and security appropriate to each type;
- iii. ensure that special care and protection is accorded to personal information entrusted to the Company;
- iv. comply with applicable law relating thereto; and
- v. establish standards relative to use and protection of Company information and that of our employees, customers, vendors and other stakeholders.

The Company will achieve these objectives through the development of policies, programs, standards and procedures that:

- Restrict how we collect certain types of information, how we may use the information we collect, and to whom we may transfer the information we collect, in order to protect the *privacy* of personally identifiable information provided to the Company (see the NiSource Privacy Program); and
- Prevent unauthorized access to information assets, including physical, administrative and technical safeguards to ensure the *security* of information under the control of the Company, and development of procedures to notify those persons whose information is subject to a security breach (see the NiSource Information Security Program); and
- Identify remedial actions to mitigate the adverse impacts of *identity theft* where it is likely that information has fallen into the hands of unauthorized individuals, including, for example, procedures for recognizing indicators of identity theft and responding to those indicators (see the NiSource Red Flag Program).

Administration

The NiSource Information Security and Privacy Committee (the "Committee") is responsible for overseeing and implementing this Policy. It shall be the duty of the Committee to meet at least once per year to review the Policy and more frequently as the Committee deems appropriate in light of any developing events or circumstances.

The Committee consists of representatives from departments within the Company that the Company has determined are in a position to assess risk, minimize relevant exposures and assess compliance with procedures to safeguard sensitive information.

Accordingly, the membership of the Committee shall include the Chief Legal Officer and at least one designated representative from each of the following departments: Business Continuity, Corporate Compliance, Corporate Ethics, Corporate Security, Customer Engagement, Corporate Communications, Corporate Risk Management, Facility Management, Human Resources, IT Security, Legal, and Records Management.

The head of each represented department shall serve as a member of the Committee unless he/she designates other member(s) of the department to serve on the Committee. The Committee shall implement such programs, standards and procedures it deems reasonably necessary and appropriate to further the goals of this Policy. The Chair of the Committee shall be the Chief Legal Officer.

Compliance

Each employee has a duty to be familiar with and comply with this Policy and other Company policies, programs, standards and procedures regarding information privacy and security, including, but not limited to, those listed in Appendix A. As part of this duty, each employee has an obligation to complete all required training with respect to information security and privacy. Failure to comply may result in disciplinary action up

to and including termination. Employees are also referred to the *Code of Business Conduct*.

Appendix A

Information Classification and Protection Policy

Information Resources Policy

Records Management Policy

Information Security Program

Privacy Program

Red Flag Program

External Access Standard

Internet Use Standard

Protection from Malicious Software Standard

Wireless Networking Standard

Electronic Messaging Policy

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of Kentucky

A NiSource Company

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Privacy Statement

Version: March 14, 2013

Columbia Gas of Kentucky, Inc.

Our mailing address is:

Columbia Gas of Kentucky

P.O. Box 14241

Lexington, KY 40512-4241

Customer Contact Center: **1-800-432-9345**

Columbia Gas of Kentucky (referred to as the "Company," "we," "our" or "us") understands how important customer privacy is to you. We hope this statement will answer your questions about our information and privacy practices. Generally, this Privacy Statement does not apply to information which is already available to the public, or which becomes available to the public hereafter. Any dispute related to this Privacy Statement will be governed by our [Terms of Use](#).

The Information We Collect About You

We collect and maintain certain information when providing service to you. The information may be gathered through a variety of means such as by telephone, through this Web site or the mail, etc. This information includes among other things, your name, service address, mailing address, social security number, account number, consumption history and telephone number.

In addition, we may collect and maintain information volunteered by you, such as survey information or Web site registrations in order to complete online transactions, including managing your account and job applications.

If you sign up for one of our online payment methods, we may require you to provide your bank account numbers and other financial information in order to process payment.

We collect information about usage of this Web site, such as the number of visitors to the Web site and the number of users that click on certain links or utilize certain services. We may collect information regarding your browsing of this Web site.

While we may maintain energy-related educational content directed at children under the age of 13, our Web site does not knowingly collect or maintain personal information from children under the age of 13.

Our Use of the Information We Collect on the Web Site

We reserve the right to use industry standard software to create summary statistics of data we collect from your use of this Web site, which may then be used to highlight what our visitors find interesting, to improve the Web site design specifications, to identify system performance issues and for other internal purposes. We may also collect information linked to you, your account, your computer, and/or device to, for example:

- help diagnose problems with our servers and to administer this Web site;

- organize the pages you have visited on this Web site;
- help us to recognize you if you visit multiple pages on this Web site during the same session, so that we don't need to ask you for your password on each page;
- display your e-mail address on our sign-in form, so that you don't need to re-type the e-mail address each time you log in to your account;
- provide you with a more individualized delivery of information and an optimal viewing experience on this Web site;
- let us know whether you received and opened our e-mail; and
- serve advertisements of interest to you after you have left this Web site.

In collecting the above information for these purposes, we reserve the right to store small items of data ("cookies") on your hard drive and/or use a range of industry standard technologies, which may include, without limitation, cookies, pixels, and beacons.

If you do not want us to serve advertisements to you through a third party after you have left this Web site, you must delete or prevent placement of our browser cookie by following the instructions contained in the Help section of your browser.

Our Information Sharing with Affiliates and Third Parties

Maintaining the confidentiality of sensitive personal information is important to us. The Company takes steps to protect from public disclosure your social security and bank account numbers and other sensitive personal information. However, sensitive personal information may be shared with affiliates, agents, contractors, vendors and other organizations that assist us in the conduct of our business. We further reserve the right to disclose, without your consent, any communications or sensitive personal information, when requested to do so by courts, government agencies or by law enforcement authorities, or through legal process; or in connection with the possible sale or reorganization of all or a portion of our business; or when we believe that disclosure is reasonably necessary or appropriate to prevent physical harm, or financial loss related to the conduct of our business. Certain limited information we collect (e.g., name, address, e-mail address, browsing of this Web site, etc.) may be shared with affiliates and other third parties for the commercial marketing purposes of such affiliates or third parties, as permitted by law.

Opting Out of Information Sharing with Affiliates and Third Parties

If you do not want our affiliates and third parties to receive certain limited information we collect (e.g., name, address, e-mail address, browsing of this Web site, etc.) for commercial marketing purposes, or if you want to know more about your options in this regard, please call our Customer Contact Center at **1-800-432-9345**. Note, even if you opt-out of having such information released for commercial marketing purposes, we may still provide such information to affiliates and third parties such as vendors, agents, contractors and other organizations that assist us in the conduct of our business, or the provision of utility service.

Opting Out of Cookie Information Sharing

If you do not want us to share your limited Web browsing information and serve advertisements to you through a third party after you have left this Web site, you must delete or prevent placement of our browser cookie by following the instructions contained in the Help section of your browser.

Accessing and Correcting Your Information with Us

If you believe the information the Company holds about you is inaccurate or incomplete, please contact us at the Customer Contact Center number above, so we can investigate your concerns.

Privacy Statement Modifications

The Company may modify this Privacy Statement at any time. Material changes will be posted for thirty (30) days before becoming effective.

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Automated Meter Reading (AMR)

In an effort to improve customer service and convenience, Columbia Gas of Kentucky is upgrading the way it reads natural gas meters by installing a radio-based Automated Meter Reading System (AMR). Installation of this new technology was authorized by the Kentucky Public Service Commission as part of Columbia Gas of Kentucky's 2013 rate case.

The new AMR system will be installed on all residential and commercial meters across Columbia Gas of Kentucky's service territory in 2014. It will allow the company to obtain an actual monthly meter reading, even on hard-to-reach meters. Technicians from Columbia Gas of Kentucky or our contractor, TruCheck, will install the electronic equipment necessary to read natural gas meters using radio technology from a vehicle.

Frequently Asked Questions

What is Automated Meter Reading?

Automated Meter Reading (AMR) use wireless, computer technology to transmit gas usage data from the meter to our meter readers who drive specially-equipped company vehicles through neighborhoods.

Why is Columbia Gas of Kentucky doing this?

AMR meters will help us provide a higher level of customer service through more accurate meter reading and billing. AMR devices also help to keep our meter readers safe with fewer injuries, such as dog bites and slips, trips and falls.

How will my meter be read by AMR?

The AMR System uses radio technology to automatically read your gas meter from a vehicle. As the specially equipped vehicle drives by, the AMR transmits the meter reading data to a computer in the vehicle.

What is the installation schedule for the new AMR devices?

The new AMR devices will be installed on approximately 120,000 residential and commercial meters across the company's service territory in 2014. Postcards will be mailed to customers approximately 2-4 weeks ahead of installation at their location.

What if my meter is indoors? How does that impact me short term and long term?

Short term, we will need to gain access to your home to make the AMR installation. If no one is home, our contractor will leave a door hanger asking to set up an appointment for installation. Long term, we will no longer need to enter your home to read your meter following the installation.

How is the AMR device powered?

The power of the AMR System is supplied by its own long-term battery. The unit does not draw any current from your electrical system.

What is the expected length of time to convert my gas meter?

The installation process is expected to take approximately 20 minutes.

Do I need to be present during the AMR device installation?

The majority of installations do not require the technician to enter the home or business and do not require the customer to be present during the work. Customers requiring additional upgrades to their gas meter assemblies will be contacted in order to set up an appointment, thus minimizing any service disruption.

Who will install the new AMR device?

Columbia Gas of Kentucky employees or employees of our contractor, TruCheck, will install the new AMR devices. All technicians will have uniforms, photo identification and marked vehicles.

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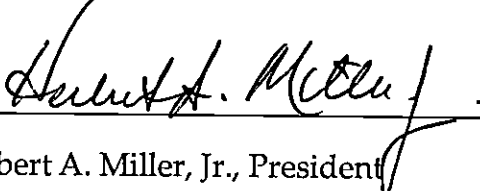
COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CONSIDERATION OF THE IMPLEMENTATION)
OF SMART GRID AND SMART METER) CASE NO. 2012-00428
TECHNOLOGIES)

CERTIFICATION

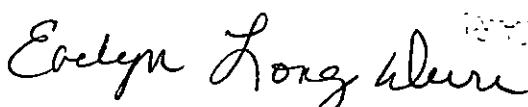
The undersigned, Herbert A. Miller, Jr., states that he is President of Columbia Gas of Kentucky, Inc., located in Lexington, Kentucky and certifies that NiSource and Columbia Gas of Kentucky, Inc., have developed, implemented and continually examine and revise as necessary internal cybersecurity procedures.


Herbert A. Miller, Jr., President

COMMONWEALTH OF KENTUCKY

COUNTY OF FAYETTE

SUBSCRIBED AND SWORN to before me by Herbert A. Miller, Jr. on this the 13th
day of June, 2016.


Notary Public # 419232

My Commission expires: 05/15/2018