

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CONSTELLATION NEW-ENERGY-GAS DIVISION, LLC	)	
	)	
COMPLAINANT	)	
	)	
VS.	)	CASE NO.
	)	2005-00184
COLUMBIA GAS OF KENTUCKY, INC.	)	
	)	
DEFENDANT	)	

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

Columbia Gas of Kentucky, Inc. ("Columbia"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information requested herein has been provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Refer to Paragraph 1 of the Stipulation and Recommendation. State whether the language of Columbia's Delivery Service Rate tariff was, as written, ambiguous and unreasonable. Explain the response.

2. State how many customers make customer-owned gas deliveries into Columbia's system pursuant to Columbia's Delivery Service Rate Tariff.

3. State whether the Constellation New-Energy-Gas Division, LLC ("CNEG") customers that are the subject of this proceeding are the only Columbia customers that received Delivery Interruption Notices during November of 2004.

4. If other customers received Delivery Interruption Notices, state whether Columbia assessed a penalty against any of these other customers.

a. If no penalty was assessed against these other customers, explain why no penalty was assessed.

b. If a penalty was assessed against other customers, state whether any of these other customers have received a refund.

(1) If yes, state the number of customers that received a refund and explain the circumstances of the refund.

(2) If no, explain why it is reasonable under paragraph 2 of the Stipulation and Recommendation to make a refund of a portion of the penalty amounts only to the CNEG customers.

5. Refer to Paragraph 2 of the Stipulation and Recommendation. Explain why the refund agreed to by the parties does not violate KRS 278.160 and KRS 278.170.

a. Explain how the refund amount was determined.

b. Explain how the parties determined the amount of refund that would be applied to each customer.

c. Explain how the refund amount will be applied to the customers and provide an example.

6. Refer to Footnote 1 of the Stipulation and Recommendation. Explain why one customer has already received a \$75 refund.



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Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED November 30, 2006

cc: All Parties