

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF)	
KENTUCKY, INC. FOR AN ADJUSTMENT)	CASE NO.
OF RATES)	2007-00008

FIRST DATA REQUEST OF COMMISSION STAFF
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Kentucky Industrial Utility Customers, Inc. ("KIUC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 11, 2007. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response 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 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.

KIUC shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any requests to which KIUC fails or refuses to furnish all or part of the requested information, KIUC shall

provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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.

1. Refer to the Direct Testimony of Richard A. Baudino (“Baudino Testimony”), page 3. Assume for purposes of this question Columbia Gas of Kentucky, Inc. (“Columbia”) provided the basis or justification or evidence for the proposed adjustments. Would Mr. Baudino still oppose the proposed changes? If yes, explain why.

2. Refer to the Baudino Testimony, page 15. Mr. Baudino states that he does not support Columbia’s tariff changes for its Delivery Service agreement because the proposed interruption provision is far too broad and gives Columbia too much discretion in declaring interruptions of service to DS/MLDS customers.

a. Does Columbia’s current tariff provide Columbia with discretion as to when it can interrupt a customer under this rate schedule?

b. If yes, describe the restrictions on Columbia’s ability to interrupt under its current tariff that would no longer exist if the proposed tariff is approved.

c. Interruptible customers receive a discount in exchange for the possibility of interruption. Explain why Columbia should have any restrictions on its ability to interrupt these customers.



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

DATED June 26, 2007

cc: All Parties

Case No. 2007-00008