

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF	)	
KENTUCKY, INC. FOR AN ADJUSTMENT OF	)	CASE NO.
RATES; APPROVAL OF DEPRECIATION STUDY;	)	2026-00099
APPROVAL OF TARIFF REVISION; AND OTHER	)	
RELIEF	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Kentucky Industrial Utility Customers, Inc. (KIUC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 23, 2026. The Commission directs KIUC to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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 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

¹ 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).

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 response if KIUC obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request 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 shall be given to copied and scanned 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, KIUC 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 the Direct Testimony of Anthony Sandonato (Sandonato Direct Testimony), page 9. Explain why the recommendation proposed by KIUC did not include a recommended demand charge to recover the cost of serving the demand-related portion of Delivery Service (DS) customers. If the exclusion was intentional then explain why the decision was made. If the inclusion of demand charge to recover the cost of serving the demand-related portion of Delivery Service (DS) customers results in a

proposed change to the recommendation, provide the updated recommendation and any or all supporting documentation.

2. Refer to the Sandonato Direct Testimony, page 8. Explain and provide KIUC's position on how the Commission should treat interclass subsidization.

3. Refer to the Sandonato Direct Testimony, page 4. Explain from a class cost-causation standpoint how allowing the Safety Modification and Replacement Program (SMRP) to be collected through a volumetric charge differs from a fixed charge.

4. Refer to Sandonato Direct Testimony, page 6, lines 6–10, where it explains the recommended recovery mechanism for the SMRP revenue requirement allocated to the DS class. Describe in detail how converting from a volumetric to a fixed monthly customer charge recovery mechanism redistributes SMRP costs responsibility among DS customers.



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DATED SEP 08 2026

cc: Parties of Record

Case No. 2026-00099

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