COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO THE ATTORNEY GENERAL

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General), 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 the Attorney General to the Commission's July 22, 2021 Order in Case No. 2020-00085[1] 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

[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).

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.

The Attorney General shall make timely amendment to any prior response if the Attorney General 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 the Attorney General fails or refuses to furnish all or part of the requested information, the Attorney General 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, the Attorney General 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 John Defever (Defever Direct Testimony), page 8. Explain whether there are other jurisdictions that allow a publicly regulated utility to exclude a cash working capital adjustment, when one is supported by either a lead-lag study or through the one-eighth method of operating expenses.

2. Refer to Defever Direct Testimony, page 7. Explain the pitfalls of utilizing a 1/8 method when a company conducts a lead-lag study.

3. Refer to the Defever Direct Testimony, page 9. Provide prior examples of the Commission approving a decrease to the revenue requirement related to Customer Deposits. For each example, provide the case number.

4. Refer to the Defever Direct Testimony, pages 14-15.

a. Explain in detail why Mr. Defever chose a 75/25 percent split for the shareholders' and ratepayers' responsibility, respectively, for Columbia Kentucky's projected Directors and Officers Liability Insurance (D&O).

b. Confirm that the Commission has approved a similar adjustment for D&O expenditures. If confirmed, provide the case number.

5. Refer to the Defever Direct Testimony, page 17. Provide the basis for the recommended adjustment to remove severance pay from Columbia Kentucky's cost of service.

6. Refer to the Defever Direct Testimony, page 24. Explain why the entirety of Columbia Kentucky's Employee Stock Purchase Plan expense should be removed from Columbia Kentucky's forecasted test year, as opposed to the amounts related to the discount that Columbia Kentucky's employees experience when purchasing NiSource common stock.

7. Refer to Defever Direct Testimony, page 31. Explain whether there are any benefits to excluding the 2023 and 2024 Safety Modification and Replacement Program (SMRP) investments from the revenue requirement beyond transparency on customers' bills.

8. Refer to the Direct Testimony of Aaron Rothschild (Rothschild Direct Testimony), generally.

a. Provide Exhibits ALR-1 through ALR-5 in Excel spreadsheet format with all columns, formulas, and rows unprotected and fully accessible.

b. For all sources which reference the "most current data available at time of schedule preparation," provide the date the data was prepared or accessed.

9. Refer to the Rothschild Direct Testimony, page 9, lines 13-17. Explain why using the absolute median of the return-on-equity (ROE) results would constitute a reasonable strict mathematical approach. Identify the factors that would support selecting a different percentile within the range.

10. Refer to the Rothschild Direct Testimony, page 10, lines 17-18. Explain, in further detail, how the distribution of results supports a range between the 60th and 80th percentiles, rather than a different range, specifically as it relates to this proceeding.

11. Refer to the Rothschild Direct Testimony, page 10, lines 22-23. Explain the reasonableness of giving the same weight to all ROE analyses performed. In the response, include whether any of the analyses are more reasonable than others and why.

12. Refer to the Rothschild Direct Testimony, page 27, lines 1-3.

a. Explain whether all methods of obtaining the stock price were considered equally, or if more weight was given to the average stock price or spot value.

b. Compare and contrast this methodology with only using an average stock price such as the six-month average stock price or three-month average stock price.

13. Refer to the Rothschild Direct Testimony, page 34, lines 15-17.

a. Explain why weighted averages over three months were used in the Weighted Average Capital Asset Pricing Model (CAPM) approach as opposed to a longer time horizon, such as six months or one year.

b. Provide an update to Exhibit ALR-4, page 2 that includes a six month and one year weighted average and the inputs for each. Provide the response in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

14. Refer to the Rothschild Direct Testimony, page 38 and Exhibit ALR-4, page 3. Provide the sources of the data used to calculate the Historical Blend and Forward Betas. In the response, include the date the data was accessed or, If applicable, the publication date.

Justin McNeil RP

Justin McNeil
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601-8294

DATED SEP 8 2026

cc: Parties of Record

Service List for Case 2026-00099

* Ashley LaRock
Columbia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

* L. Allyson Honaker
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

* Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Heather Temple
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

* Jody Kyler Cohn
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

* Judy M Cooper
Director, Regulatory Services
Columbia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

* John Horne
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Denotes served by Email

* Honorable Kurt J Boehm
Attorney at Law
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

* Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Meredith L. Cave
Honaker Law Office, PLLC
1795 Alysheba Way
Suite 1203
Lexington, KY 40509

* Michael West
Office of the Attorney General Office of Rate Intervention
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

* Columbia Gas of Kentucky, Inc.
290 W Nationwide Blvd
Columbus, OH 43215

* Toland Lacy
Office of the Attorney General
700 Capital Avenue
Frankfort, KY 40601