

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. (Columbia Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 26, 2026. The Commission directs Columbia Kentucky 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.

Columbia Kentucky shall make timely amendment to any prior response if Columbia Kentucky 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 Columbia Kentucky fails or refuses to furnish all or part of the requested information, Columbia Kentucky 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, Columbia Kentucky shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide any guidance, policies, and procedures that NiSource, Inc and NiSource Corporate Services Company (NCSC) provides to employees related to allocation and billing pools as it relates to Columbia Kentucky.

2. Refer to the Direct Testimony of Kimra Cole, Attachment KHC-1, page 1. Provide the cost allocation manual provided to Dean Dorton.

3. Refer to Case No. 2021-00183,² Columbia Kentucky's response to the Attorney General's First Request for Information, Item 66, Attachment A. Provide the most recent copy of the Accounting Manual of NCSC in the same format as Item 66, Attachment A.

4. Provide any Federal Energy Regulatory Commission (FERC) approval for the cost-allocation methodologies utilized by Columbia Kentucky or any of its affiliates.

5. Refer to Columbia Kentucky's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 9.

a. Explain in detail what revenues Columbia Kentucky refers to when stating "certain other gas revenues."

b. Explain in detail why Columbia Kentucky does not forecast unbilled revenues, off-system sales revenues, and certain other gas revenues in a forecasted test period.

c. Explain in detail why the base period should include revenues attributable to unbilled revenues, off-system sales revenues, and certain other gas revenues, yet the forecasted test period should not include those amounts.

d. Provide the total base period amounts for all revenues that were included in the base period and omitted from the forecasted test period.

6. Refer to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) Advisory Bulletins (ADB) concerning the susceptibility of older plastic pipe in gas distribution systems to premature brittle-like cracking, as described in the National

² Case No. 2021-00183, *Electronic Application of Columbia Gas of Kentucky, Inc. for an Adjustment of Rates; Approval of Depreciation; Approval of Tariff Revisions; Issuance of a Certificate of Public Convenience and Necessity; and Other Relief.*

Transportation Safety Board's April 23, 1998 special investigation report, Brittle-Like Cracking in Plastic Pipe for Gas Service.³ These include ADB-99-01 and ADB-99-02, issued March 11, 1999; ADB-02-07, issued November 26, 2002; and ADB-07-02, issued September 6, 2007.

a. Explain whether Columbia Kentucky has any Aldyl A pipe or other plastic piping addressed in these advisory bulletins remaining in its system. If yes, identify the manufacturer, material, manufacturing and installation years, locations, main mileage, and number of services.

b. Explain how Columbia Kentucky has evaluated the susceptibility of these facilities to brittle-like cracking and prioritized them for replacement.

7. Refer to the PHMSA Annual Report for Calendar Year 2025 Gas Distribution System for Columbia Kentucky.

a. Provide a copy of this report in the record.

b. Explain where the 255 miles of unprotected bare steel mains and 4,591 unprotected bare steel services reported for 2025 are located. Identify the locations by county, city or community, and operating area, including the main mileage and number of services in each area.

c. Provide how much of this unprotected bare steel has been replaced since December 31, 2025. State the main mileage and number of services remaining as of the response date.

d. Explain what specific pipe materials make up the 3.3 miles reported as "Other" in the PHMSA annual report. Identify the location, mileage, diameter, and

³ National Transportation Safety Board, NTSB/SIR-98/01.

installation year of each material type. Explain why each material was reported as “Other.”

e. Explain whether Columbia Kentucky has experienced any reportable incidents, significant events, or emergencies within the last ten years involving bare steel, Aldyl A, or piping classified as “Other,” regardless of cause. For each occurrence, provide the date, location, pipe material, whether a main or service was involved, cause, incident or event report number, if applicable, and corrective action. Identify whether pipe failure or deterioration caused or contributed to the occurrence.

8. For calendar years 2024 and 2025, identify the number of Grade 1, Grade 2, and Grade 3 leaks identified on each of the following pipe categories. Provide separate totals for each year by leak grade and pipe category, with mains and services reported separately.

- a. Unprotected bare steel;
- b. Cathodically protected bare steel;
- c. Aldyl A; and
- d. Piping identified as “Other” in the PHMSA annual report.

9. For the responses provided to Item 8 above, of the leaks identified in 2024 and 2025, describe how many remain open and unrepaired as of the response date.

10. Identify the criteria Columbia Kentucky used to prioritize these facilities for replacement, and explain the weight given to each evaluation criteria.

11. Explain what Columbia Kentucky’s annual replacement targets are for these materials, and what is the projected year for completing their replacement.

12. Explain what measures Columbia Kentucky is taking to address the risk of failure in these facilities until replacement is completed. Identify leak survey frequencies, monitoring activities, and criteria for accelerated replacement.

13. Refer to Columbia's response to Commission Staff's Fourth Request for Information (Staff's Fourth Request), Item 7, Attachment A, and the Cost Element Descriptions (column N) "Other Depreciation" and "Hardware Depreciation" shown on worksheet "NCSC CB".

a. Provide a description of the capital assets for which this depreciation expense is incurred, their purpose, and their benefit to Columbia Gas in Kentucky.

b. Provide the rationale for the billing pool selection for each billing pool used to allocate depreciation expense.

c. Explain what entity owns the capital assets for which the depreciation expense is incurred.

d. Explain whether the entity that owns the capital assets for which the depreciation expense is incurred earns a return on that investment. If so, explain from where that return is recovered.

e. Provide the regulatory authority under which NiSource allocates depreciation expense to its subsidiary operating companies.

14. Refer to Columbia's response to Staff's Fourth Request, Item 7, Attachment A, and the Cost Element Descriptions (column N) "Interest Short Term Debt," "Interest Long Term Debt," and "Other Interest" shown on worksheet "NCSC CB".

a. Provide information regarding the loans for which this interest expense is generated, including any supporting documentation which indicates the

corporate entity which entered the loan, the term of the loan, and the interest rate for the loan.

b. Provide the regulatory authority and/or the corporate agreements that allow for interest incurred by NCSC to be allocated to Columbia Kentucky.

15. Refer to Columbia's confidential response to Commission Staff's Third Request for Information, Item 34, workbook Basis 9 (38), worksheet 'Sheet2' and workbook Basis 20 Support (9), worksheet 'Cognos Query.'

a. Quantify the increase in NCSC costs from calendar year 2024, and provide an explanation for the cost increases quantified for the following [REDACTED] categories:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

b. Describe the incremental benefit to Columbia Kentucky from the NCSC cost increases incurred.

16. Provide the job titles and number of employees who hold each job title employed by NCSC and by Columbia Kentucky as of December 31, 2023, December 31, 2024, and December 31, 2025.

Justin McNeil RP

Justin McNeil
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DATED OCT 14 2026

cc: Parties of Record

Case No. 2026-00099

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