

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:)
)
APPLICATION OF COLUMBIA GAS) Case No. 2016-00162
OF KENTUCKY, INC. FOR AN)
ADJUSTMENT OF RATES)

COLUMBIA GAS OF KENTUCKY, INC.'S
DATA REQUESTS SERVED UPON
THE COMMUNITY ACTION COUNCIL

Pursuant to the Commission's Order in this proceeding, dated June 10, 2016, Columbia Gas of Kentucky, Inc. ("Columbia"), propounds the following data requests to be answered by the Community Action Council in writing. These data requests shall be deemed to be continuing so as to require supplementary answers between the time the answers are served and the time of the hearing.

Respectfully submitted,
COLUMBIA GAS OF KENTUCKY, INC.

By: Brooke E. Wancheck
Brooke E. Wancheck, Assistant General
Counsel

Brooke E. Wancheck, Assistant General
Counsel
Stephen B. Seiple, Assistant General Counsel
Joseph M. Clark, Senior Counsel
P.O. Box 117
290 W. Nationwide Blvd.
Columbus, Ohio 43216-0117

Telephone: (614) 460-5558
Fax: (614) 460-8403
E-mail: bleslie@nisource.com
sseiple@nisource.com
josephclark@nisource.com

Lindsey W. Ingram III
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801
Telephone: (859) 231-3982
Fax: (859): 246-3672
Email: l.ingram@skofirm.com

Richard S. Taylor
225 Capital Avenue
Frankfort, Kentucky 40601
Telephone: (502) 223-8967
Fax: (502) 226-6383
Email: attysmitty@aol.com

Attorneys for
COLUMBIA GAS OF KENTUCKY, INC

INSTRUCTIONS FOR ANSWERING

(1) All responses shall be in writing, and each response shall identify the name and position of the person(s) who provided the response. Each data request shall be answered separately and fully. Each response shall first restate the data request being answered.

(2) All responses to data requests shall be served upon Columbia at the offices and its attorneys in this proceeding:

(3) You are reminded that all answers must be made separately and fully, and that an incomplete or evasive answer is a failure to answer.

(4) You are under a continuing duty to seasonably supplement your response with respect to any question directly addressed to the identity and location of person having knowledge of discoverable matters, the identity of any person expected to be called as an expert witness at hearing, and the subject matter of which he or she is expected to testify, and to correct any response which you know or later learn is incomplete or incorrect.

(5) All information is to be divulged which is in your possession or control or within the possession and control of your attorneys, investigators, agents, employees, or other representatives of you or your attorney.

(6) Where a data request calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.

(7) Where an objection is interposed to any data request, or part thereof, answer all parts of the data request to the extent not objected to.

(8) Identification. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, requires you to state his or her full name and residential and business address; (b) a corporation, requires you to

state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the address of all of its offices in Kentucky; (c) a business, requires you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a document, requires you to state the number of pages and the nature of the document (*e.g.*, letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location and custodian; (e) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the person participating in the communication and to state the date, manner, place and substance of the communication.

(9) Identification of documents. With respect to each data request, in addition to supplying the information requested, you are to identify all documents that support, refer to, or evidence the subject matter of each data request and your answer thereto.

If any or all documents identified herein are no longer in your possession, custody, or control because of destruction, loss, or any other reason, then do the following with respect to each and every such document: (a) describe the nature of the document (*e.g.*, letter or memorandum); (b) state the date of the document; (c) identify the persons who

sent and received the original copy of the document; (d) state in as much detail as possible the contents of the document; and (e) state the manner and date of disposition of the document.

If you contend that you are entitled to withhold from production any or all documents identified herein on the basis of attorney-client privilege, the work product doctrine, or other grounds, then do the following with respect to each and every document: (a) describe the nature of the document (*e.g.*, letter or memorandum); (b) state the date of the document; (c) identify the persons who sent and received the original and a copy of the document; (d) state the subject matter of the document; and (e) state the basis upon which you contend you are entitled to withhold the document from production.

(10) Representative. As used herein, the term “representative” means any and all agents, employees, servants, officers, directors, attorneys, or other persons acting or purporting to act on behalf of the person in question.

(11) Person. As used herein, the term “person” means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments, and other units therein, and shall include, but not be limited to, a public or private corporation, partnership, joint venture, voluntary or unincorporated association, organization, proprietorship, trust, estate, governmental agency, commission, bureau, or department.

(12) Document. As used herein, the term “document” means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram cable, report, record, contract, agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, electronic mail, computer discs or tapes, or computer produced interpretations thereof, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody, or control or which was, but is no longer, in your possession, custody or control.

(13) Communication. As used herein, the term “communication” means any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, dialogues, discussion, interviews, consultations, agreement, and other understandings between or among two or more persons.

(14) Contention Data Request. When a data request requires you to “state the basis of” a particular claim, contention, or allegation, state in your answer the identity of

each and every communication and each and every legal theory that you think supports, refers to, or evidences such claim, contention, or allegation.

(15) The Word "Or." As used herein, the word "or" appearing in a data request should not be read so as to eliminate any part of the data request, but, whenever applicable, it should have the same meaning as the word "and." For example, a data request stating "support or refer" should be read as "support and refer" if an answer that does both can be made.

DATA REQUESTS

1. Looking at the table on page 6 of Mr. Ratchford's direct testimony, what is the margin of error for the poverty rates listed?
2. For each county listed on page 6 of Mr. Ratchford's direct testimony,
 - a. Please provide a list of each assumption that was used by Mr. Ratchford to estimate the number of "customers in poverty" in each county.
 - b. Please define all adjustments made by Mr. Ratchford in his analysis to either the "poverty rate" or "customers in poverty" amount in each county.
3. Referring to page 5, lines 24-35, of Mr Ratchford's testimony, please provide a full copy of the data contained in the 2014 U.S. Census Bureau, Small Area Income and Poverty Estimates used to support the table presented on p. 6 of his Direct Testimony and provide the website reference for reviewing county level data.

4. Please confirm that all households reflected in the Small Area Income and Poverty Estimates that have income below the poverty level:
 - a. Pay natural gas bills directly.
 - b. Use natural gas for heating.
 - c. Can be considered poor based on household circumstances such as having status as a college student or a retiree who owns his own home.
 - d. Would not be considered under the poverty level when government transfers (e.g., Supplemental Nutrition Assistance Program or SNAP, Earned Income Credits, Medicaid, and other benefits) were added to their household income.
5. For each of the 12,963 energy assistance applications referenced at page 7, line 11 of Mr. Ratchford's direct testimony,
 - a. Please provide the number of applications for natural gas service to be provided by Columbia and the total dollar amount that was paid to Columbia for such utility service.
 - b. Please confirm that payments to Columbia were for both base rate charges and purchased gas charges.
6. Please confirm that the 22,501 households referenced on page 8, line 8 of Mr. Ratchford's direct testimony are eligible for, and receive, benefits related to housing, food and other needs.

7. Please confirm that Columbia has offered energy assistance for up to 2000 customers annually and that to date the number requesting enrollment has not exceeded 2,000 natural gas customers.