

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

IN THE MATTER OF: THE APPLICATION OF : Case No. 2016-00162
COLUMBIA GAS OF KENTUCKY, INC. FOR AN :
ADJUSTMENT OF RATES :

**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.'s
SUPPLEMENTAL REQUESTS FOR INFORMATION TO
COLUMBIA GAS OF KENTUCKY, INC.**

Dated: August 5, 2016

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
11. "Columbia" or "Company" means Columbia Gas of Kentucky and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total company as well as Intrastate data, unless otherwise requested.

**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.'s
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COLUMBIA GAS OF KENTUCKY, INC.**

Docket No. 2016-00162

- Q.2-1. Follow-up to Columbia's Response to Staff's Data Request Set One No. 029, Attachments A, B, and C and Columbia's Response to Staff's Data Request Set Two No. 65, Attachment B.
- a. Please explain why Columbia attributes 400 Mcf of design day demand to the IS - Ind. rate schedule on the Design Day tab of the cost of service studies, although Schedules M.2.2 and M.2.3 show zero IS volumes.
 - b. Please identify which Class/Description presented in Schedules M.2.2 and M.2.3 corresponds to the SS – Com. and SS – Ind. rate schedules from the Design Day tab of the cost of service studies. If Schedules M.2.2 and M.2.3 show zero volumes for these rate schedules, please explain why Columbia attributes design day demand to these rate schedules on the Design Day tab of the cost of service studies.
- Q.2-2. Follow-up to Columbia's Response to Staff's Data Request Set One No. 029, Attachments A, B, and C. Please confirm that the IS – Ind., GDS – Com., GDS – Ind., DS – Com., and DS – Ind. schedules, including the GTS Flex Rates and GTS Special Rate, are considered to be interruptible by Columbia, consistent with the presentation on the Design Day tab of the cost of service studies. If not, please provide, for each schedule, the test year interruptible and firm throughput (Mcf) separately, and the test year interruptible and firm design day demand (Mcf) separately, in Excel format.
- Q.2-3. Follow-up to Columbia's Response to Staff's Data Request Set One No. 029, Attachments A, B, and C.
- a. For the DS/IS class total design day demand of 82,400 Mcf stated on the Design Day tab of the cost of service studies, please separately state the Mcf attributable to the GTS Flex Rates, GTS Special Rate, and the standard GTS Delivery Service customers, as well as the Mcf attributable to any other schedules included in the total DS/IS demand of 82,400 Mcf.
 - b. For the DS/IS class design day demand excluding interruptible volumes of 3,900 Mcf stated on the Design Day tab of the cost of service studies, please separately state the Mcf attributable to the GTS Flex Rates, GTS Special Rate, and the standard GTS Delivery Service customers, as well as the Mcf attributable to any other schedules included in the DS/IS demand of 3,900 Mcf.
- Q.2-4. Follow-up to Columbia's Response to Staff's Data Request Set One No. 029, Attachment B. Please explain why Columbia believes it is appropriate to include interruptible volumes in the calculation of the Design Day demand allocator (which is incorporated into Factor No. 5).
- Q.2-5. Follow-up to Columbia's Response to Staff's Data Request Set Two No. 65, Attachment B. Please provide, in Excel format, the DS/IS annual test year volumes (Mcf) that correspond to each of the following customer monthly usage blocks:
- First 2,000 Mcf per month
 - Next 2,000 Mcf per month
 - Next 2,000 Mcf per month
 - Next 2,000 Mcf per month

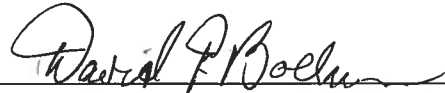
- Next 2,000 Mcf per month
- Next 10,000 Mcf per month
- Next 10,000 Mcf per month
- Next 10,000 Mcf per month
- Next 20,000 Mcf per month
- Next 20,000 Mcf per month
- Next 20,000 Mcf per month
- Next 20,000 Mcf per month
- Over 120,000 Mcf per month

The total Mcf volumes included in Columbia's response should sum to the DS/IS volumes of 6,897,867.4 Mcf presented on the Rate Design MBP-1 tab of the CKY_R_PSCDR2_NUM65_Attachment_B_072216 file (i.e. not including the GTS Flex Rates or GTS Special Rate volumes).

Please provide your responses to our consultant at the address listed below.

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Respectfully submitted,



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August 5, 2016