KY PSC Case No. 2016-00162 Response to Attorney General's Data Request Set One No. 38 - **Revised** Respondents: Jana Croom, Kimberly Cartella and Stephen Seiple

COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION DATED JULY 8, 2016

38. Reference the Columbia application generally. Provide copies of any salary surveys/studies or analysis of prevailing wage and salary amounts or any other documents utilized in the process of determining the amount of compensation, benefits, bonuses, and raises for wage and salaried employees.

Response:

Columbia utilizes salary and wage studies provided by third parties. The entities that prepare the studies consider the studies to be highly confidential and Columbia must obtain consent from these entities before providing the studies. The studies are also voluminous. It has not been possible for Columbia to obtain all of the necessary consents, and copy all of the studies, in time to respond to this data request by July 22, 2016. Therefore, in a July 21, 2016, telephone conversation between Stephen Seiple (attorney for Columbia) and Kent Chandler (attorney for the Attorney General's office) Columbia and the Attorney General's office have agreed that Columbia may have until July 29, 2016, to provide information responsive to this request.

Revised Response:

Please refer to Attachment AG-1-38(A) [CONFIDENTIAL] for a copy of the March 2015 General Industry Benefit Index and Attachment AG-1-38(B) [CONFIDENTIAL] for a copy of the March 2015 Energy Industry Benefit Index reports that were completed by Aon Hewitt on behalf of NiSource. These studies were completed for all of NiSource to assess the overall value of employee benefits.

NiSource is provided information from Mercer's ePRISM Compensation Management Tool establishing the applicable salary range for applicable jobs within NiSource, incorporating data from energy and non-energy sectors. The ePRISM system allows Mercer to compile a library of benchmark data from various salary surveys sources and develop salary ranges for NiSource positions. See AG-1-38(C) [CONFIDENTIAL] for a copy of the data included in ePRISM. This file includes data for each position in which a salary range is assigned. The file contains the source of the data, the survey job description, the number of companies and incumbents that are reported for that position, the 50th percentile of base salary and total cash compensation for each survey job, and the minimum, median, and maximum of the salary range assigned to the job at NiSource.

See AG-1-38(D) [CONFIDENTIAL], AG-1-38(E) [CONFIDENTIAL], and AG-1-38(F) [CONFIDENTIAL] for the World at Work, Mercer, and Aon Hewitt salary increase survey results that are utilized to determine appropriate levels of merit increases for Columbia.

The entire contents of the attachments referenced above are confidential and confidential treatment is sought for the entire documents attached to this response, as explained in Columbia's Petition for Confidential Treatment filed along with this data request response.