

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

In the matter of: : CASE NO. 2016-00162  
Adjustment of Rates :  
Of Columbia Gas of Kentucky, Inc. :

**FIRST REQUEST FOR INFORMATION OF  
INTERSTATE GAS SUPPLY, INC.  
TO COLUMBIA GAS OF KENTUCKY.**

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Comes Interstate Gas Supply, Inc. (“IGS”), by counsel, and as a proposed intervenor and in an effort to comply with the procedural schedule to the extent intervention is granted respectfully submits the following first requests for information to Columbia Gas of Kentucky (“CKY” or “Columbia”) to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”).

**Instructions**

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, CKY, its witnesses, or their counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses CKY receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If CKY objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control CKY, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

### **First Requests for Information**

1. Referencing page 8 lines 13 through 17 of Columbia witness Cooper's testimony please identify:
  - a. How would the "average index price" referenced by Ms. Cooper be calculated by Columbia?
  - b. Identify the index referenced in this statement.
  - c. What costs would be included in the "additional applicable costs" referenced by Ms. Cooper?
  - d. How would the "average city gate equivalent commodity purchase" be calculated by Columbia?
  
2. Referencing page 6 lines 18-19, pages 7 lines 1-2, of Ms. Coopers testimony:
  - a. How many days has TCO restricted CKY from delivering gas from the Appalachian basin over the last 3 years?
  - b. Please provide the specific dates TCO has restricted CKY from delivery gas from the Appalachian basin over the last 3 years?
  - c. Please list all operational flow orders ("OFOs") TCO has called in the last three years that has affected CKY's ability to schedule gas.
  - d. Has any upstream pipeline company made CKY aware that there may be future restrictions on deliveries from the Appalachian basin?
  - e. If the answer to 2(d) is yes, please explain what information CKY has been provided about future restrictions on gas deliveries from upstream pipeline companies.
  - f. To the extent Columbia would require suppliers to deliver to different receipt points, would Columbia also modify deliveries for customers that are served by Columbia's GCR?
  
3. Referencing proposed Tariff changes discussed in Ms. Coopers testimony on page 6, lines 4-13, would Columbia be willing to agree to limit modification to supplier's receipt points to only times when an upstream pipeline company has called an OFO?
  
4. Would Columbia agree that in order to bill a customer in MCFs, the British Thermal Unit ("BTU") density of the gas must be converted to a volumetric number, otherwise known as a BTU conversion factor?

5. Would Columbia agree that historically (prior to 2010), the BTU conversion factor was close to a 1 to 1 ratio?
6. Would Columbia agree that after 2010, the BTU conversion factor utilized in the Columbia system has increased as the quantity of Marcellus Shale gas utilized in the Columbia system has increased?
7. Would Columbia agree that as the BTU conversion factor has increased, it has increased the risk associated with hedging gas for both Columbia and competitive suppliers?
8. Would Columbia agree that as the BTU conversion factor has increased, it has increased the risk that Columbia and competitive suppliers can accurately forecast a retail price per MCF?
9. Would Columbia be willing to consider switching to billing customers in dekatherms rather than MCFs?
10. Please identify any barriers that would prevent Columbia from billing customers in dekatherms rather than MCFs.
11. Would Columbia be willing to allow suppliers of Direct Service customers to aggregate deliveries and usage for all of their customers, rather than require suppliers to deliver to each Direct Service customer on a stand-alone basis?
12. Please identify any barriers that would prevent Columbia from allowing suppliers to aggregate deliveries and usage for all of their Direct Service customers.
13. Would Columbia be willing to move the Small Volume Aggregation Service ("SVAS") balancing charge such that it is billed directly to customers rather than to suppliers?
14. Please identify any barriers that would prevent Columbia from moving the SVAS balancing charge from suppliers to customers.
15. Please provide a list of the historical prices for the SVAS charge over the last five years.

Respectfully submitted,

HURT, DECKARD & MAY PLLC



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Counsel for the Petitioner,  
**INTERSTATE GAS SUPPLY, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that IGS' July 8, 2016 electronic filing is a true and accurate copy of IGS' First Request for Information to CKY and cover letter to be filed in paper medium; that the electronic filing has been transmitted to the Commission on July 8, 2016; that an original and one copy of the filing will be delivered to the Commission on July 8, 2016; that there are currently no parties excused from participation by electronic service; and that, on July 8, 2016, electronic mail notification of the electronic filing is provided to the following:

Hon. Stephen B. Seiple  
Hon. Brooke E. Wancheck  
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