

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018**

1. Provide Columbia Gas's income statement, balance sheet, and statement of retained earnings for the calendar year ending December 31, 2017.

RESPONSE:

Please see Staff DR Set 1-1 Attachment A for the income statement and balance sheet for the calendar year ended December 31, 2017.

Columbia does not maintain a statement of retained earnings.

Columbia Gas of Kentucky Inc
Balance Sheet-FERC
Regulatory View - FERC Account
As of December 31, 2017
For Internal Use Only

	Current Month	Change from Prior Month	Change from Prior Year-End
Assets and Other Debits			
Utility Plant			
Total Utility Plant	459,262,105.70	2,532,895.66	33,395,575.94
Accum Prov - Amort and Depr	(151,436,753.03)	(223,819.12)	(6,336,121.88)
Net Utility Plant	307,825,352.67	2,309,076.54	27,059,454.06
Other Plant Adjustments	-	-	-
Gas Store Undergrd_SysBal	-	-	-
Total Utility Plant	307,825,352.67	2,309,076.54	27,059,454.06
Other Property and Investments			
Non Utility Other Property	-	-	-
Accum Prov - Deprec Oth Plant	-	-	-
Investments in Associated Cos	-	-	-
Investments in Subsidiary Cos	587,191.46	2,163.41	35,432.63
Other Investments	-	-	-
Sinking Fund	-	-	-
Other Special Funds	366,027.00	366,027.00	366,027.00
Total Other Property and Investments	953,218.46	368,190.41	401,459.63
Current and Accrued Assets			
Cash	1,142,387.85	455,442.69	265,863.66
Special Deposits	-	-	-
Working Funds	1,200.00	-	1,200.00
Temp Cash Investments	-	-	-
Notes Receivable	-	-	-
Customer Accounts Receivable	10,743,611.86	2,529,834.06	745,192.11
Other Accounts Receivable	4,976,998.38	1,985,168.03	4,270,895.00
Accum Prov Uncollectible - Cr	(278,464.13)	(81,535.99)	(51,082.27)
NR from Associated Cos	-	-	-
AR from Associated Cos	33,406.53	(29,072.31)	(27,712.47)
Fuel Stock	-	-	-
Fuel Stock Expenses Undistrib	-	-	-
Residuals & Extracted Products	-	-	-
Plant Materials & Supplies	125,301.16	4,695.63	1,786.27
Merchandise	-	-	-
Allowances	-	-	-
Stores Exp Undistributed	-	-	-
Gas Stored Underground - Curr	42,734,324.47	(6,523,247.74)	(420,637.04)
LNG Stored & Held for Process	-	-	-
Prepayments	531,244.77	(105,679.75)	(3,076.18)
Interest & Dividends Rec	-	-	-
Rent Receivable	-	-	-
Accrued Utility Revenues	14,492,787.61	3,823,472.29	2,889,868.23
Misc Current & Accrued Assets	4,107,900.00	3,796,666.67	373,100.00
Derivative Instrument Assets	-	-	-
Derivative Assets - Hedging	-	-	-
Total Current and Accrued Assets	78,610,698.50	5,855,743.58	8,045,397.31
Deferred Debits			
Unamortized Debt Expense	-	-	-
Extraordinary Property Loss	-	-	-
Other Regulatory Asset	12,726,960.56	(951,028.94)	(2,350,709.04)
Preliminary Surveys	804,640.69	46,814.24	(75,240.37)
Clearing Accounts	-	(171.03)	-
Miscellaneous Deferred Debits	3,193,535.84	(6,268.36)	(221,959.87)
Research & Development Expense	-	-	-
Unamort Loss Reacquired Debt	-	-	-
Accum Deferred Income Taxes	10,122,282.00	(5,470,916.68)	(1,677,279.00)
Unrecovered Purchase Gas Costs	937,003.22	(1,754,237.43)	(1,605,531.17)
Total Deferred Debits	27,784,422.31	(8,135,808.20)	(5,930,719.45)
Total Assets and Other Debits	415,173,691.94	397,202.33	29,575,591.55

Columbia Gas of Kentucky Inc
Balance Sheet-FERC
Regulatory View - FERC Account
As of December 31, 2017
For Internal Use Only

	Current Month	Change from Prior Month	Change from Prior Year-End
CAPITALIZATION and LIABILITIES			
Proprietary Capital			
Common Stock FERC	23,806,200.00	-	-
Preferred Stock Issued	-	-	-
Capital Stock Subscribed	-	-	-
Premium on Capital Stock	-	-	-
Other Paid-in Capital	6,518,523.64	-	-
Capital Stock Expense	-	-	-
Retained Earnings	89,979,851.08	-	-
Retained Earnings - Current Year	12,681,242.79	3,374,415.41	12,681,242.79
Unapprop Undistrib Sub Earning	-	-	-
Reacquired Capital Stock	-	-	-
Accumulated OCI	-	-	-
Total Proprietary Capital	132,985,817.51	3,374,415.41	12,681,242.79
Long Term Debt			
Bonds	-	-	-
Advances from Associated Cos	114,375,000.00	-	-
Other Long Term Debt	-	-	-
Unamortized Premium on LTD	-	-	-
Unamortized Discount on LTD	-	-	-
Total Long Term Debt	114,375,000.00	-	-
Other Noncurrent Liabilities			
Obligations - Cap Leases - NC	345,488.10	(2,900.70)	345,488.10
Accum Prov - Property Ins	-	-	-
Accum Prov - Injuries & Damage	99,323.00	(125.00)	(7,862.00)
Accum Prov - Pension & Benefit	3,212,416.18	(182,079.70)	(4,752,231.25)
Accum Misc Operating Provision	-	-	-
Provision for Rate Refunds	-	-	-
Asset Retirement Obligations	-	-	-
Total Other Noncurrent Liabilities	3,657,227.28	(185,105.40)	(4,414,605.15)
Current & Accrued Liabilities			
Curr Portion of Long-Term Debt	-	-	-
Notes Payable	-	-	-
Accounts Payable	9,007,812.36	(206,286.82)	341,832.87
NP to Associated Cos	-	-	(4,210,000.00)
AP to Associated Cos	31,087,366.89	1,397,387.78	21,033,757.24
Customer Deposits	2,241,000.02	27,975.00	78,006.02
Taxes Accrued	7,390,557.99	4,579,703.25	1,292,062.60
Interest Accrued	10,482.10	718.26	4,728.99
Dividends Declared	-	-	-
Tax Collections Payable	1,501,960.61	570,653.54	203,047.25
Misc Current & Accrued Liab	18,404,664.10	(4,022,476.98)	62,647.03
Obligation Cap Lease - Current	34,212.46	107.62	34,212.46
Derivative Liability	-	-	-
Derivative Liability - Hedge	-	-	-
Total Current & Accrued Liabilities	69,678,056.53	2,347,781.65	18,840,294.46
Deferred Credits			
Customer Adv. for Construction	3,186,666.02	3,879.77	(216,378.27)
Acc Defd Investment Tax Credit	123,371.00	(2,033.00)	(35,760.00)
Other Deferred Credits	-	-	(409,120.25)
Other Regulatory Liabilities	39,989,799.60	36,650,239.34	36,147,674.91
Accum Defer Inc Tax - Oth Prop	49,004,089.00	(40,516,823.92)	(32,920,966.32)
Accum Defer Inc Tax - Other	2,173,665.00	(1,275,151.52)	(96,790.62)
Total Deferred Credits	94,477,590.62	(5,139,889.33)	2,468,659.45
Total Capitalization & Liabilities	415,173,691.94	397,202.33	29,575,591.55

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Columbia Gas of Kentucky Inc
Income Statement-FERC
Regulatory View - FERC Account
For the Month Ended December 31, 2017
For Internal Use Only

	Current Month	Change from Prior Month	Year-To- Date
Operating Revenues			
Gas Residential Sales	10,470,271.60	4,762,603.96	71,660,455.89
Gas Comm & Indust Revenues	4,399,633.22	1,904,425.46	30,534,340.53
Gas Sales for Resale	6,704.28	1,244.24	77,326.25
Gas Interdepartmental Sales	-	-	-
Gas Intercompany Transfers	-	-	-
Total Sales of Gas	14,876,609.10	6,668,273.66	102,272,122.67
Electric Residential Revenues	-	-	-
Elec Comm & Indust Rev	-	-	-
Public Street & Hwy Lighting	-	-	-
Elec Oth Sales to Public Auth	-	-	-
Sales to Railroads & Railways	-	-	-
Electric Sales for Resale	-	-	-
Elec Interdepartmental Sales	-	-	-
Total Sales of Electricity	-	-	-
Forfeited Discounts - Gas	36,348.29	17,595.55	474,103.53
Forfeited Discounts - Ele	-	-	-
Total Forfeited Discounts	36,348.29	17,595.55	474,103.53
Misc Service Revenues - Gas	7,462.60	(11,698.35)	122,558.40
Misc Service Revenues - Ele	-	-	-
Total Miscellaneous Service Revenues	7,462.60	(11,698.35)	122,558.40
Rent from Electricity Property	-	-	-
Other Electric Revenues	-	-	-
Rev Transm of Elec of Oth	-	-	-
Nonutility Revenues - Serv Co	-	-	-
Regional Transm Service Rev	-	-	-
Rev Transp Gas of Oth - Gather	-	-	-
Rev Transp Gas of Oth - Transm	-	-	-
Rev Transp Gas of Oth - Distr	3,103,628.62	793,333.37	24,610,660.41
Rev from Storing Gas of Oth	-	-	-
Sales - Prod Extracted from NG	-	-	-
Incidental Gasoline & Oil Sale	-	-	-
Rent from Gas Property	4,942.00	-	59,144.00
Other Gas Revenues	3,383,984.36	(323,325.89)	9,606,788.39
Gas Provision of Rate Refunds	-	-	-
Total Other Operating Revenues	6,536,365.87	475,904.68	34,873,254.73
Total Operating Revenues	21,412,974.97	7,144,178.34	137,145,377.40
Operating Expenses			
Operation Expenses			
Manufac Gas Production - Oper	-	-	-
NG Production & Gather - Oper	-	-	-
Products Extraction - Oper	-	-	-
Other Gas Supply - Operations	9,911,450.63	3,981,381.01	52,042,993.09
Steam Power - Operations	-	-	-
Hydraulic Power - Operations	-	-	-
Other Power - Operations	-	-	-
Other Power Supply - Oper	-	-	-
NG Stor, Term & Proc - Oper	-	-	-
Transmission Exp - Oper	-	-	-
Regional Market Exp - Oper	-	-	-

Columbia Gas of Kentucky Inc
Income Statement-FERC
Regulatory View - FERC Account
For the Month Ended December 31, 2017
For Internal Use Only

	Current Month	Change from Prior Month	Year-To- Date
Distribution Exp - Oper	1,402,968.78	194,255.37	12,718,401.64
Customer Accounts - Oper	430,949.78	53,394.87	4,337,051.69
Cust Serv & Info Exp - Oper	84,961.68	(84,325.43)	1,185,634.63
Sales Expenses - Oper	204,521.22	184,928.76	384,327.33
Admin & General Exp - Oper	2,335,345.79	145,755.08	22,919,102.11
Total Operation Expenses	14,370,197.88	4,475,389.66	93,587,510.49
Maintenance Expenses			
Production Expenses - Maint	-	-	-
NG Stor, Term & Proc - Maint	-	-	-
Transmission Exp - Maint	-	-	-
Distribution Exp - Maint	600,440.90	209,689.27	4,919,520.40
Maintenance Gen and Admin	79,951.60	32,618.24	516,839.35
Total Maintenance Expenses	680,392.50	242,307.51	5,436,359.75
Depreciation Expense	921,821.41	11,131.05	10,653,299.66
Depreciation Expense for AROs	-	-	-
Amort & Deplet of Util Plant	99,685.40	(8,324.04)	1,324,159.33
Amort of Gas Plant Acq Adj	-	-	-
Amort of Conversion Exp	-	-	-
Reg Debits	-	-	-
Reg Credits	-	-	-
Other Taxes FERC	391,409.05	71.03	4,679,717.01
Income Taxes - State	880,715.00	705,005.00	948,268.76
Income Taxes - Federal	(142,259.00)	(34,588.00)	68,785.29
Total Utilities Current Fed State	738,456.00	670,417.00	1,017,054.05
Deferred Income Taxes	(1,859,323.98)	(1,924,930.98)	9,884,268.65
Prov Deferred Inc Tax - Cr	2,282,278.22	1,664,317.22	(4,711,890.69)
Investment Tax Credit Adj	(2,033.00)	-	(35,760.00)
Gain from Disposition of Plant	-	-	-
Loss from Disposition of Plant	-	-	-
Accretion Expenses	-	-	-
Total Operating Expenses	17,622,883.48	5,130,378.45	121,834,718.25
Net Utility Operating Income(Loss)	3,790,091.49	2,013,799.89	15,310,659.15
Other Income & Deductions			
Revenues from Merchandising	-	-	-
Costs and Exp Merch Job	-	-	-
NonUtility Revenues	54,654.87	25,627.49	325,370.81
NonUtility Unaffil	623.91	(561.32)	8,393.77
Nonoperating Rental Revenue	-	-	-
Earnings of Subsidiaries	2,163.41	(1,776.25)	35,432.63
Interest and Dividend Income	-	-	56,521.55
Allow for Other FUDC	(24,739.42)	(98,978.42)	140,580.82
Misc Nonoperating Income	358,220.21	30,212.98	3,454,425.48
Gain Disposition of Property	-	-	-
Total Other Income	390,922.98	(45,475.52)	4,020,725.06
Loss on Disposal of Property	-	(97,356.36)	97,388.37
Misc Amortization	(2,158.59)	-	(25,903.08)
Other Inc Exp Donations	40,517.00	25,041.00	123,885.00
Corporate Owned Life Ins	-	-	-

Columbia Gas of Kentucky Inc
Income Statement-FERC
Regulatory View - FERC Account
For the Month Ended December 31, 2017
For Internal Use Only

	Current Month	Change from Prior Month	Year-To- Date
Penalties	-	-	(19.76)
Other Inc Exp PoliticalContrib	-	-	11.68
Other Inc Deductions	63,933.31	40,773.80	286,332.43
Total Other Income Deductions	102,291.72	(31,541.56)	481,694.64
NonUtility Taxes	-	-	-
Income Taxes - Federal	142,258.00	34,587.00	(68,786.30)
Income Taxes - State	18,495.00	1,247.00	211,101.78
Total Income Taxes Federal Other	160,753.00	35,834.00	142,315.48
Other Deferred Income Taxes	-	-	103,777.45
Prov Defer Inc Tax - Oth - Cr	(43,360.00)	(43,360.00)	(201,176.05)
Invest Tax Credits Adjust -Net	-	-	-
Amortization of ITC	-	-	-
Total Taxes Other Income & Deduct	117,393.00	(7,526.00)	44,916.88
Total Other Income (Deductions)	171,238.26	(6,407.96)	3,494,113.54
Interest LT Debt	-	-	-
Amort of Debt Disc & Exp	-	-	-
Amort of Loss on Reacq Debt	-	-	-
Amort of Prem on Debt - Cr	-	-	-
Interest Exp Affiliate	555,480.81	26,247.45	6,215,906.05
Other Interest Expense	9,753.24	7,890.24	15,930.22
AFUDIC PISCC	21,680.29	63,521.54	(108,306.37)
Total Interest Charges	586,914.34	97,659.23	6,123,529.90
Income Before Extraordinary Items	3,374,415.41	1,909,732.70	12,681,242.79
Extraordinary Income	-	-	-
Extraordinary Deductions	-	-	-
Net Extraordinary Items	-	-	-
Extraordinary Taxes	-	-	-
Deferred Extraordinary Taxes	-	-	-
Income Taxes - Federal & Other	-	-	-
Total Extraordinary Items	-	-	-
Net Income	3,374,415.41	1,909,732.70	12,681,242.79

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**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018**

2. Provide Columbia Gas's Net Investment Rate Base and Capital Structure for the calendar year ending December 31, 2017. Provide all supporting work papers, assumptions, and calculations.

RESPONSE:

Please see Staff DR Set 1-2 Attachment A for the capital structure for the calendar year ended December 31, 2017. Attachment B to Staff DR Set 1-2 provides Columbia's Net Investment Rate Base for the calendar year ended December 31, 2017.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

3. Using the financial information provided in the responses to Items 1 and 2, calculate:
- a. Columbia Gas's actual Return on Equity (income available to common shareholders divided by common equity) for the calendar year ending December 31, 2017.
 - b. Columbia Gas's average cost of long-term debt for the calendar year ending December 31, 2017.
 - c. Columbia Gas's average cost of short-term debt for the calendar year ending December 31, 2017.
 - d. Provide all supporting work papers, assumptions, and calculations.

RESPONSE:

- a. Columbia's actual Return on Equity is 9.81% which is the net income of \$12,681,243 divided by a 13-month average common equity of \$129,304,686.

Please note that the calculation of ROE is based on actual unadjusted net income and common equity as shown in Columbia's financial statements and, therefore, includes items that are non-utility in nature and, accordingly, are not included in the determination of a revenue requirement for the purposes of developing base rates.

- b. Please refer to Staff DR Set 1-3 Attachment A for the average cost of long-term debt of 5.34% for the calendar year ended December 31, 2017.
- c. Please refer to Staff DR Set 1-3 Attachment B for the average cost of short-term debt for the calendar year ended December 31, 2017. The average cost of short-term debt of 1.44% is the average of the monthly money pool rates for 2017.
- d. Please refer to Staff DR Set 1-1 Attachment A for the income statement and Staff DR Set 1-2 Attachment A for the 13-month average common equity. Workpapers supporting the average cost of long-term and short-term debt are provided in Part B and C, respectively.

NISOURCE INC. AND SUBSIDIARIES
OPERATING COMPANIES MONEY POOL RATES
FOR 2017

MONTH	DAYS	AVERAGE DAILY BALANCES			MONTHLY INTEREST ACCRUALS			MONTHLY RATES *		
		<u>S-T DEBT</u>	<u>INVESTMENT</u>	<u>COMPOSITE</u>	<u>S-T DEBT</u>	<u>INVESTMENT</u>	<u>COMPOSITE</u>	<u>S-T DEBT</u>	<u>INVEST</u>	<u>COMPOSITE</u>
		\$	\$	\$	\$	\$	\$	%	%	%
JAN	31	1,065,531,741.94	-	1,065,531,741.94	1,172,404.92	-	1,172,404.92	1.30%	0.00%	1.30%
FEB	28	934,300,892.86	-	934,300,892.86	903,468.82	-	903,468.82	1.26%	0.00%	1.26%
MAR	31	1,015,902,096.77	-	1,015,902,096.77	1,123,069.18	-	1,123,069.18	1.30%	0.00%	1.30%
APR	30	1,034,171,933.33	-	1,034,171,933.33	1,164,896.26	-	1,164,896.26	1.37%	0.00%	1.37%
MAY	31	812,516,129.03	30,181,684.23	842,697,813.26	913,335.86	15,862.99	929,198.85	1.32%	0.62%	1.30%
JUN	30	457,966,667.67	-	457,966,667.67	534,622.78	-	534,622.78	1.42%	0.00%	1.42%
JUL	31	678,419,354.84	-	678,419,354.84	896,933.34	-	896,933.34	1.56%	0.00%	1.56%
AUG	31	792,306,451.61	-	792,306,451.61	1,047,948.47	-	1,047,948.47	1.56%	0.00%	1.56%
SEP	30	576,938,400.00	-	576,938,400.00	716,409.68	-	716,409.68	1.51%	0.00%	1.51%
OCT	31	576,838,709.68	-	576,838,709.68	746,831.39	-	746,831.39	1.52%	0.00%	1.52%
NOV	30	727,833,333.33	-	727,833,333.33	924,976.38	-	924,976.38	1.55%	0.00%	1.55%
DEC	31	844,328,387.10	-	844,328,387.10	1,243,309.03	-	1,243,309.03	1.73%	0.00%	1.73%
Average	365	793,087,841.51	2,515,140.35	795,602,981.87	11,388,206.11	15,862.99	11,404,069.10	1.44%	0.63%	1.43%

* Assumes 365 day yield no matter if actual days are 366.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

4. Using the Capital Structure provided in the response to Item 2 and the return/interest rates calculated in the response to Item 3, fill out the table below:

Component of Capitalization	Per Books 12/31/17	Ratios	Actual Rates	Average Weighted Cost
Short-Term Debt				
Long-Term Debt				
Preferred Stock				
Common Equity				
Total Capitalization	\$	0.000%		0.0000%

RESPONSE:

Please refer to Staff DR Set 1-4 Attachment A for the capital structure and the average weighted cost.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

5. Using the table below, provide the calculation of the gross revenue conversion factor ("GRCF") including a 35 percent Federal Income Tax ("FIT") rate.

Line #	Description	Rates	State	Federal
1	Operating Revenue		100.000000%	100.000000%
2	Less:Uncollectible Expense			
3	Less: PSC Assessment			
4	Less: Production Activities Deduction State			
5				
6	Income before State Income Tax		100.000000%	100.000000%
7	State Income Tax		0.000000%	0.000000%
8				
9	Income before Federal Income Tax			100.000000%
10	Federal Income Tax			0.000000%
11				
12	Operating Income Percentage (Line 9 - Line 10)			100.000000%
13				
14	Gross Revenue Conversion FACTOR (Line 1 / Line 12)			1.000000
15				
16	Composite Income Tax Rate (Line 7 + Line 10)			0.000000%
17				
18	Common Equity Gross-up (Line 16 / (1 - Line 16))			0.000000%

RESPONSE:

Please refer to Staff DR Set 1-5 Attachment A for the calculation of the gross revenue conversion factor at the 35% federal income tax rate.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

6. Using the table below, provide the calculation of the GRCF including a 21 percent FIT rate:

Line #	Description	Rates	State	Federal
1	Operating Revenue		100.000000%	100.000000%
2	Less: Uncollectible Expense			
3	Less: PSC Assessment			
4	Less: Production Activities Deduction State			
5				
6	Income before State Income Tax		100.000000%	100.000000%
7	State Income Tax		0.000000%	0.000000%
8				
9	Income before Federal Income Tax			100.000000%
10	Federal Income Tax			0.000000%
11				
12	Operating Income Percentage (Line 9 - Line 10)			100.000000%
13				
14	Gross Revenue Conversion FACTOR (Line 1 / Line 12)			1.000000
15				
16	Composite Income Tax Rate (Line 7 + Line 10)			0.000000%
17				
18	Common Equity Gross-up (Line 16 / (1 - Line 16))			0.000000%

RESPONSE:

Please refer to Staff DR Set 1-6 Attachment A for the calculation of the gross revenue conversion factor at the 21% federal income tax rate.

**COLUMBIA GAS OF KENTUCKY, INC.
 RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
 DATED MARCH, 13, 2018**

7. Using the table below, calculate the weighted average cost of capital ("WACC") with a 35 percent FIT rate and WACC with a 21 percent FIT rate.

Component of <u>Capitalization</u>	Average Weighted	Adjusted Weighted Cost of <u>Capital to Reflect 35% Fed. Tax Rate</u>	Adjusted Weighted Cost of <u>Capital to Reflect 21% Fed. Tax Rate</u>
Short-Term Debt		0.00%	0.00%
Long-Term Debt		0.00%	0.00%
Preferred Stock		0.00%	0.00%
Common Equity		0.00%	0.00%
Total Capitalization			

RESPONSE:

Please refer to Staff DR Set 1-7 Attachment A.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018**

8. Refer to the Prepared Direct Testimony of Megan N. Garber ("Garber Testimony") on Behalf of Columbia Gas, pages 3-4. Explain in detail why Columbia Gas is unable to calculate the impact of the Tax Cuts and Jobs Act to its excess accumulated deferred income taxes ("ADIT") with certainty at this time.

RESPONSE:

The 2017 federal return is in the process of being prepared and is not due to be filed until October 15, 2018 at the latest. Until such time estimates have been used to prepare the balances of ADIT related to 2017 tax return amounts which are included in the balances of ADIT at December 31, 2017. This includes the determination of whether return positions taken have been approved by the Internal Revenue Service, such as the availability of 100% bonus depreciation for assets placed in service from September 27, 2017 to December 31, 2017. Once the return is finalized the ADIT related to 2017 which is impacted by the federal rate decrease resulting from the Tax Cuts and Jobs Act of 2017 ("TCJA") will be adjusted.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

9. Using Columbia Gas's responses to this Request for Information and the table below, provide the revenue reduction resulting from the decrease in the FIT rate from 35 percent to 21 percent.

Line No.	Description	35% Federal Income Tax Rate	21% Federal Income Tax Rate	Revenue Impact
1	Net Investment Rate Base			
2	Returns Adjusted For Income Taxes			
3				
4	Required Annual Operating Income Before Taxes (Line 1 x Line 2)	\$ -	\$ -	\$ -
5				
6	Amortization Of Excess ADIT (Protected) - Using Aram			
7	Amortization Of Excess ADIT (Unprotected)			
8				
9	Total Amortization Of Excess ADIT (Line 6 + Line 7)		-	
10	Gross-Up Factor Using 21% Federal Tax Rate			
11	Total Reduction In Deferred Income Tax Expense (Line 9 x Line 10)			-
12				
13	Total Reduction In Revenue Requirements (Line 4 + Line 11)			\$ -

If Columbia Gas lacks sufficient information to apply the ARAM method, please instead use the Reverse South Georgia Method to calculate the amortization of excess protected ADIT in Line 6 of the above table. If estimates and assumptions were made to calculate the amounts identified in response to this Item, please identify and describe any estimates and assumptions.

RESPONSE:

The current base rates as ordered in in Case No. 2016-00162. The Order did not specify the net investment rate base upon which Columbia is permitted to earn. Therefore, Columbia has calculated the revenue reduction based on the change in the effective tax rate to its income eligible for tax calculation as shown in Attachment CYL-1 which is revised in AG-1-5 Attachment A. The amount on Line 6, is the amortization of the Excess Property related ADIT based on an estimate of ARAM. The amortization of the excess Federal NOL ADIT, which is an ADIT deficiency because it is a deferred tax asset, is included in line 6 because it is being amortized over an estimate of the remaining book life of the property (39 years).

The amount on Line 7, is the amortization of the remaining excess ADIT which is a net ADIT deficiency over a straight line period of 10 years. Originally Columbia proposed to use a period of 20 years, however, the underlying accounts upon which the remaining excess ADIT is based will reverse over a period much less than 20 years, so Columbia is proposing 10 years as a more appropriate amortization period. The effect of the changes outlined above-result in s a net \$58,516 difference (increase to tax expense) annually compared to a 20 year amortization period.

Line No.	Description	35% Federal Income Tax Rate	21% Federal Income Tax Rate	Revenue Impact
5				
6	Amortization of Excess ADIT (Protected) - Using ARAM		\$ (767,629)	
7	Amortization of Excess ADIT (Unprotected)		\$ 167,016	
8				
9	Total Amortization of Excess ADIT (Line 6 + Line 7)		\$ (600,613)	
10	Gross-Up Factor Using 21% Federal Tax Rate		1.3617825	
11				
12	Total Reduction in Deferred Income Tax Expense (Line 9 x Line 10)			\$ (817,904)

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

10. Using Columbia Gas's responses to this Request for Information and the table below, provide the revenue reduction resulting from the decrease in the FIT rate from 35 percent to 21 percent.

Line No.	Description	35% Federal Income Tax Rate	21% Federal Income Tax Rate	Revenue Impact
1	Capitalization			
2	Returns Adjusted For Income Taxes			
3				
4	Required Annual Operating Income Before Taxes (Line 1 x Line 2)	\$ -	\$ -	\$ -
5				
6	Amortization Of Excess ADIT (Protected) - Using Aram			
7	Amortization Of Excess ADIT (Unprotected)			
8				
9	Total Amortization Of Excess ADIT (Line 6 + Line 7)		-	
10	Gross-Up Factor Using 21% Federal Tax Rate			
11				
11	Total Reduction In Deferred Income Tax Expense (Line 9 x Line 10)			-
12				
13	Total Reduction In Revenue Requirements (Line 4 + Line 11)			\$ -

RESPONSE:

The current base rates are as ordered in Case No. 2016-00162. The Order did not specify the capitalization upon which Columbia is permitted to earn. Therefore, Columbia calculated the revenue reduction based on the change in the effective tax rate to its income eligible for tax calculation as shown in Attachment CYL-1

which is revised in AG-1-5 Attachment A. Please see the response to Staff 1-009 for the description of Lines 6 and 7 in the information request.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018**

11. Provide monthly sales and revenues recorded in 2017 by customer class.

RESPONSE:

Please refer to Staff DR Set 1-11 Attachment A for the monthly sales and revenues recorded in 2017 by customer class.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

12. Provide schedules reflecting both a 5-year and a 15-year amortization period for Columbia Gas's unprotected excess ADIT and the impact each amortization period would have on Columbia Gas's revenue requirement.

RESPONSE:

Please see below for the 5-year and a 15-year amortization period for Columbia's unprotected excess ADIT and the impact on the revenue requirement.

Line No.	Description	21% Federal Income Tax Rate	Revenue Impact
1	Amortization of Excess ADIT (Protected) - Using ARAM	\$ (767,629)	
2	Amortization of Excess ADIT (Unprotected) - 5 Year Amortization	\$ 334,032	
3			
4	Total Amortization of Excess ADIT (Line 6 + Line 7)	\$ (433,597)	
5	Gross-Up Factor Using 21% Federal Tax Rate	1.3617825	
6			
7	Total Reduction in Deferred Income Tax Expense (Line 9 x Line 10)		\$ (590,465)
8			
9			
10	Amortization of Excess ADIT (Protected) - Using ARAM	\$ (767,629)	
11	Amortization of Excess ADIT (Unprotected) - 15 Year Amortization	\$ 111,344	
12			
13	Total Amortization of Excess ADIT (Line 6 + Line 7)	\$ (656,285)	
14	Gross-Up Factor Using 21% Federal Tax Rate	1.3617825	
15			
16	Total Reduction in Deferred Income Tax Expense (Line 9 x Line 10)		\$ (893,717)

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

13. Explain whether any of the expenses charged to Columbia Gas by its affiliates in the test year contain any FIT implications. If so, state whether Columbia Gas addressed the impacts on its revenue requirements. If not, provide the impact of the FIT implications on Columbia Gas's test-year expense and revenue requirement.

RESPONSE:

The return on capital invested in affiliate's buildings that are occupied by NCSC employees contain FIT implications. Columbia has not addressed the impacts of those charges on its revenue requirements. The reduction of the FIT rate would have reduced the 2017 expenses charged to Columbia by approximately \$48,000.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

14. Have any of Columbia Gas's affiliates resolved or are in process of settling the impact of the Tax Cuts and Job Act on rates in other states. If so, provide the amortization period(s) established for the unprotected excess ADIT.

RESPONSE:

Yes, one affiliate, Columbia Gas of Maryland, has settled the impact of the Tax Cuts and Jobs Act of 2017 ("TCJA"). Columbia Gas of Maryland received approval on March 14, 2018 for an amortization period over the remaining book life of the assets using an estimate of ARAM for all property related excess ADIT, and an amortization period of 10 years on the remaining (non-property related) ADIT.

Proceedings are underway for other Columbia affiliates related to the determination and implementation of the TCJA impacts. All of the other proceedings are in progress; there have been no settlements or orders in any jurisdictions other than Maryland.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

15. State whether Columbia Gas has received any letter or written opinion from the Internal Revenue Service since January 1, 2010, regarding the treatment of Columbia Gas's excess ADIT and, if so, provide a copy of the letter or written opinion.

RESPONSE:

Columbia Gas has not received any letter or written opinion from the Internal Revenue Service since January 1, 2010 regarding the treatment of Columbia Gas's excess ADIT.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

16. Provide any letters or written opinions prepared by the Internal Revenue Service and relied on by Columbia Gas or its agents to calculate Columbia Gas's excess ADIT or to determine how the excess ADIT may be reimbursed to ratepayers under federal tax law, regardless of whether those letters or written opinions were prepared for or at the request of Columbia Gas.

RESPONSE:

Columbia Gas has not relied on any specific letters or written opinions prepared by the Internal Revenue Service. Columbia Gas has relied on the laws contained in IRC Section 168(i)(9) also known as the 'normalization rules' to calculate excess ADIT and Rev. Proc. 88-12 to determine the method in which excess ADIT is to be refunded to ratepayers to be in compliance with the normalization rules as affirmed in Section 13001 of the TCJA. The normalization rules are clear in stating that in order to use the normalization method of accounting, a taxpayer in computing its cost of service for ratemaking purposes, cannot reduce the excess

tax reserve more rapidly or to a greater extent than the reserve would be reduced under the average rate assumption method (“ARAM”). Under ARAM the excess deferred tax reserve is reduced over the remaining lives of the property that gave rise to the reserve for deferred taxes. Excess ADIT can be refunded to ratepayers no faster than over the remaining book life of the property using ARAM if the books and records are available. Alternatively, the Reverse South Georgia method is to be used if books and records are not available.

Although the normalization rules are specific to book vs. tax method and life related property differences, the same principles apply to other property related book vs. timing differences. Columbia Gas has consistently applied the normalization rules to all property related differences since they too reverse over the remaining book life of the property. This has been the methodology approved in Columbia Gas’s last base rate case and in all previous base rate cases.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

17. If Columbia Gas's fiscal year is different from 2017, provide the fiscal year and identify and describe any effect that a non-calendar fiscal year has on the calculation of excess ADIT.

RESPONSE:

Columbia's fiscal year is 2017.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018**

18. Provide the maximum total amount of excess protected ADIT that Columbia Gas contends may be reimbursed to ratepayers annually in 2018 and for each year thereafter through 2033 using the ARAM method. If Columbia Gas is not able to apply the ARAM method because it lacks the relevant information, please separately provide the maximum total amount of excess protected ADIT that Columbia Gas contends may be reimbursed to ratepayers annually in 2018 and for each year thereafter through 2033 using the Reverse South Georgia Method.

RESPONSE:

Based on the latest projections, Columbia Gas would amortize \$767,629 in 2018 under ARAM for the excess protected ADIT. In this response, the term "protected ADIT" refers to all ADIT reversing over the remaining book life of the property using ARAM or the Reverse South Georgia Method. To forecast beyond 2018 is not accurate but the level will not change materially year to year.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

19. Identify any assets, property, accounts the depreciation of which gave rise to protected excess ADIT and:
- a. Provide the extent to which such assets, property, and accounts were depreciated as of December 31, 2017, in terms of percentage and total value;
 - b. Provide the annual depreciation schedule for each such asset, piece of property, and account for tax and regulatory purposes through 2034;
 - c. Provide the excess ADIT that arose from the depreciation of each such asset, property, and account as of January 1, 2018;
 - d. Provide the total ADIT, including excess ADIT and ADIT, that is not excess, attributable to each such property or vintage account as of December 31, 2017;
 - e. Identify and provide any other information used to calculate the maximum protected excess ADIT that may be reimbursed to ratepayers in 2018 through 2033 using the ARAM method;

f. If the information necessary to use the ARAM method is not available, please explain the method and basis for your calculation in response to the preceding Item; and

g. If estimates and assumptions were made to calculate the response to the preceding Item, please identify and describe any estimates and assumptions.

RESPONSE:

- a. Please see Attachment A for the detail by year placed in service which shows the tax depreciation of assets that generated protected excess ADIT as of December 31, 2017.
- b. Please see Attachment B for the detail by year of total estimated tax depreciation and book depreciation of assets that generated protected excess ADIT from 2018-2021. Columbia has not forecasted beyond 2021.
- c. The excess ADIT related to protected property at January 1, 2018 is \$29,072,659. For this response and the response to d. below the term “protected property” refers to all ADIT reversing over the estimated remaining book life of the property.

- d. The total ADIT related to the excess ADIT on protected property at December 31, 2017 is \$73,514,786
- e. None.
- f. The books and records are available to use ARAM.
- g. The amounts provided assume that Columbia Gas is entitled to the 100% expensing of assets from September 27, 2017 to December 31, 2017 subject to the Issue Resolution Agreement with the IRS.

Columbia Gas of Kentucky, Inc.
Case No. 2018-00041

vintage_year	tax_year	tax_balance_end	Tax Depreciation	Beginning Reserve	accum_reserve_end	Percent Depreciated
1974	2017	1,013,826	-	1,013,543	1,013,543	100%
1975	2017	703,864	-	703,350	703,350	100%
1976	2017	1,003,777	-	996,582	996,921	99%
1977	2017	3,547,611	3	3,547,611	3,547,611	100%
1978	2017	2,366,264	-	2,366,264	2,366,264	100%
1979	2017	3,617,701	-	3,617,701	3,617,701	100%
1980	2017	3,571,806	-	3,587,046	3,587,046	100%
1981	2017	3,186,532	-	3,225,710	3,186,532	100%
1982	2017	3,534,656	-	3,597,994	3,534,656	100%
1983	2017	2,434,791	-	2,455,278	2,434,791	100%
1984	2017	3,842,133	-	3,869,117	3,842,133	100%
1985	2017	3,697,036	-	3,719,191	3,697,036	100%
1986	2017	5,041,220	0	5,081,682	5,041,220	100%
1987	2017	21,170	0	21,170	21,170	100%
1987	2017	1,161,707	-	1,169,004	1,161,707	100%
1987	2017	2,759,249	-	2,770,609	2,759,249	100%
1987	2017	2,550,067	-	2,562,174	2,550,067	100%
1987	2017	2,516,026	-	2,527,699	2,516,026	100%
1988	2017	(57,191)	0	(57,191)	(57,191)	100%
1988	2017	1,014,999	-	1,029,212	1,014,999	100%
1988	2017	859,846	-	874,951	859,846	100%
1988	2017	919,003	-	943,849	919,003	100%
1988	2017	601,188	-	621,685	601,188	100%
1989	2017	(105,728)	-	(105,728)	(105,728)	100%
1989	2017	936,202	-	943,017	936,202	100%
1989	2017	841,688	-	851,772	841,688	100%
1989	2017	1,063,310	-	1,079,254	1,063,310	100%
1989	2017	1,158,326	-	1,171,247	1,158,326	100%
1990	2017	3,564,173	-	3,603,835	3,564,173	100%
1991	2017	(118,606)	0	(118,606)	(118,606)	100%
1991	2017	528,350	-	540,691	528,350	100%
1991	2017	605,137	-	621,817	605,137	100%
1991	2017	870,599	-	889,943	870,599	100%
1991	2017	825,439	-	843,093	825,439	100%
1992	2017	384,163	18,219	240,310	258,528	67%
1992	2017	538,839	-	590,067	538,839	100%
1992	2017	658,512	-	709,559	658,512	100%
1992	2017	1,450,386	-	1,514,480	1,450,386	100%
1992	2017	1,757,829	-	1,814,814	1,757,829	100%
1993	2017	(130,330)	-	(130,330)	(130,330)	100%
1993	2017	1,044,611	-	1,058,943	1,044,611	100%
1993	2017	885,990	-	910,391	885,990	100%
1993	2017	1,207,372	-	1,230,092	1,207,372	100%
1993	2017	1,322,361	-	1,346,926	1,322,361	100%
1994	2017	6,127,597	160,299	3,488,937	3,649,235	60%
1994	2017	613,691	-	624,254	613,691	100%
1994	2017	931,371	-	953,161	931,371	100%
1994	2017	1,336,365	-	1,366,146	1,336,365	100%
1994	2017	1,627,612	-	1,722,950	1,627,612	100%
1995	2017	(194,082)	-	(194,082)	(194,082)	100%
1995	2017	2,700	-	2,720	2,700	100%
1995	2017	1,015,993	-	1,031,494	1,015,993	100%

vintage_year	tax_year	tax_balance_end	Tax Depreciation	Beginning Reserve	accum_reserve_end	Percent Depreciated
1995	2017	725,189	-	734,674	725,189	100%
1995	2017	3,566,497	-	3,611,096	3,566,497	100%
1996	2017	5,607,103	504	5,686,724	5,598,296	100%
1997	2017	(286,963)	(7,213)	(293,618)	(300,830)	105%
1997	2017	1,138,360	5,883	1,167,045	1,138,360	100%
1997	2017	1,455,669	24,140	1,477,874	1,455,669	100%
1997	2017	1,418,587	40,307	1,426,929	1,418,587	100%
1997	2017	1,815,265	65,366	1,793,825	1,815,265	100%
1998	2017	(280,792)	(12,582)	(265,920)	(278,502)	99%
1998	2017	1,282,547	55,691	1,225,199	1,275,878	99%
1998	2017	1,357,955	60,412	1,291,234	1,335,740	98%
1998	2017	931,898	41,907	869,493	905,994	97%
1998	2017	1,730,100	79,796	1,584,691	1,660,755	96%
1999	2017	5,895,480	265,217	5,270,459	5,497,500	93%
2000	2017	(174,636)	(8,458)	(162,038)	(170,495)	98%
2000	2017	1,629,927	67,337	1,428,090	1,487,591	91%
2000	2017	840,345	36,979	721,750	753,046	90%
2000	2017	1,688,881	28,071	1,593,848	1,615,753	96%
2000	2017	1,316,650	59,354	1,093,887	1,146,792	87%
2001	2017	4,729,031	210,886	3,809,142	3,974,369	84%
2001	2017	(613)	(31)	(480)	(511)	83%
2002	2017	3,427,596	104,872	1,746,129	1,844,378	54%
2002	2017	2,536,988	113,989	1,986,005	2,079,928	82%
2003	2017	806,384	31,164	453,480	480,474	60%
2003	2017	(169,274)	(7,507)	(114,385)	(127,112)	75%
2003	2017	1,348,837	60,728	975,242	1,017,852	75%
2004	2017	109,097	6,559	80,907	87,466	80%
2004	2017	453,976	20,852	319,863	322,324	71%
2004	2017	2,776,985	113,049	1,956,620	2,046,997	74%
2005	2017	4,496,946	242,093	3,322,330	3,509,037	78%
2006	2017	(834,945)	(46,684)	(564,974)	(611,659)	73%
2007	2017	4,970,227	315,097	3,435,623	3,723,395	75%
2008	2017	5,687,747	90,104	5,306,040	5,378,500	95%
2008	2017	4,580,149	279,641	2,916,934	3,173,565	69%
2009	2017	4,121,384	243,191	2,378,556	2,592,627	63%
2009	2017	5,300,500	320,433	3,033,118	3,326,912	63%
2010	2017	(672,718)	(36,835)	(198,422)	(235,257)	35%
2010	2017	1,892,776	112,016	947,509	1,054,567	56%
2011	2017	961,643	50,271	401,343	451,615	47%
2011	2017	63,234	3,122	26,446	25,110	40%
2012	2017	30,993	1,136	5,703	6,838	22%
2012	2017	6,995,658	361,271	2,392,334	2,559,794	37%
2013	2017	329,804	22,561	82,762	105,323	32%
2013	2017	7,711,347	433,409	1,979,219	2,403,258	31%
2014	2017	291,328	18,668	78,638	97,306	33%
2014	2017	12,258,491	872,329	2,883,508	3,748,084	31%
2015	2017	533,734	12,318	18,745	31,063	6%
2015	2017	10,429,711	833,852	1,382,693	2,214,827	21%
2016	2017	330,734	9,162	4,683	13,845	4%
2016	2017	12,394,971	1,003,906	527,295	1,529,055	12%
2017	2017	246,226	3,448	-	3,448	1%
2017	2017	13,250,293	13,250,293	-	13,250,293	100%
2017	2017	19,599,968	10,247,530	-	10,233,861	52%
2017	2017	-	-	-	-	-
		261,988,581	30,398,145	169,645,434	197,718,284	

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

20. Identify and describe the source of all unprotected excess ADIT, and if any excess unprotected ADIT arose from the depreciation of any property or account, please state the extent to which such property or account was depreciated as of December 31, 2017, in percentage terms and total value; identify the date on which each would be fully depreciated based on the current regulatory depreciation schedule, and identify the excess unprotected ADIT attributable to each such property or account as of January 1, 2018.

RESPONSE:

Please see the response in Staff DR Set 1-21 Attachment B for the detail of all the unprotected ADIT. For purposes of this response "unprotected ADIT" refers to all remaining ADIT that is not reversing over the remaining book life of the property. Please note the unprotected ADIT is a net deferred tax asset. The unprotected deficient ADIT is not subject to regulatory depreciation expense.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018**

21. Refer to the Prepared Direct Testimony of Chun-Yi Lai on Behalf of Columbia Gas, page 6, lines 5 through 8. Provide the record kept of the regulatory liability described therein.

RESPONSE:

As of February 28, 2018, Columbia has recorded a revenue reserve in the amount of \$918,331, of which, \$71,427 is related to AMRP. Please refer to Staff DR Set 1-21 Attachment A for the accounting detail.

Columbia has also recorded a regulatory liability for Excess Deferred Income Taxes in the amount of \$36,752,351 which includes a gross up for taxes in the amount of \$9,349,852. The current amount of the Excess Deferred is \$27,402,499.

A detailed schedule of the Excess Deferred Income Taxes has been provided in Staff DR Set 1-21 Attachment B.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018**

22. Refer to the Garber Testimony, page 5, lines 1 through 6. When does Columbia Gas anticipate providing the calculations referenced, and what contingencies will affect the timing of providing these calculations?

RESPONSE:

Please refer to the response to Staff DR Set 1-8 for the explanation of when actual excess ADIT will be known. A resolution of the availability of 100% expensing in 2017 will be known once a response to the Issue Resolution Agreement request is received from the IRS. At this time the best known estimates have been provided.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018

23. Refer to the Garber Testimony, page 6, lines 7 through 13. Has Columbia formally requested an Issue Resolution Agreement at this time? If so, please provide a copy of this request and any response.

RESPONSE:

No, Columbia has not yet formally submitted an Issue Resolution Agreement. Columbia is in the process of finalizing the formal request for the Issue Resolution Agreement related to the availability of 100% expensing in 2017.

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED MARCH, 13, 2018**

24. Provide copies of all schedules provided in the responses, supporting calculations, and documentation in Excel spreadsheet format with formulas intact and unprotected, and all rows and columns fully accessible.

RESPONSE:

Please see supporting documentation included in Columbia's responses to Commission Staff Data Requests Set 1.