

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

In the Matter of:)	
)	
ELECTRONIC INVESTIGATION)	
OF THE REASONABLENESS OF)	CASE NO. 2018-00044
THE ENERGY EFFICIENCY AND)	
CONSERVATION RIDER OF)	
COLUMBIA GAS OF KENTUCKY,)	
INC.)	

MOTION TO AMEND PROCEDURAL SCHEDULE

Now comes Columbia Gas of Kentucky, Inc. (“Columbia”) and respectfully moves the Public Service Commission (“Commission”) to amend the procedural to allow for pre-filed direct testimony and subsequent data requests in the above-captioned matter.

In support of its request, Columbia states the following:

1. In Case No. 2016-00107, Columbia filed an application to continue its Energy Efficiency Conservation Rider and Energy Efficiency Conservation Program for an additional five years. Included with the filing was direct testimony of its consultant, outlining the effectiveness of Columbia’s programs. Columbia responded to data requests, participated in an informal conference and on October 11, 2016, the Commission issued an Order, approving the extension of

Columbia's program for five years through June 30, 2021 and the recovery mechanism through January 2022.

2. On December 29, 2017, Columbia filed a revised tariff sheet, via the Commission's electronic tariff filing system, proposing to revise its Energy Efficiency/Conservation Program Recovery Component ("EECPRC"), pursuant to its tariff.
3. On January 30, 2018, the Commission suspended the proposed tariff change for five months up to June 29, 2018 and opened an investigation into the reasonableness of Columbia's EECP as a whole.
4. On May 11, 2018, the Commission issued an Order setting forth a procedural schedule, allowing for discovery and intervenor testimony. The schedule does not provide, however, for direct testimony by Columbia.
5. Columbia has responded to data requests from the Community Action Council ("CAC"), the Attorney General and two sets from the Commission Staff.¹ The response time set forth in the procedural schedule and subsequent data requests was compressed, providing for seven days to respond.

¹ Columbia received a third set of data requests from Staff on June 15, 2018 with responses due on June 21, 2018, pending a decision on a Motion for Extension of Time.

6. In an investigation proceeding in front of the Commission, Columbia has the burden of proof and should be afforded a reasonable opportunity to meet this burden.² Outside of responses to data requests, Columbia has not had the opportunity to make a case for continuing its energy efficiency and conservations programs. Thus, to avoid any due process concerns with any action that might be taken in this proceeding, Columbia respectfully requests that it be afforded an opportunity to present pre-filed direct testimony in support of its programs. Furthermore, based on the data requests submitted to Columbia in the proceeding, Columbia believes that, without the opportunity to submit direct testimony, reliance strictly on the responses to these data requests could perhaps prejudice the decision in the proceeding
7. Additionally, pre-filed direct testimony will assist the Commission and the other parties to determine the reasonableness of the EECPRC. Columbia would be willing to include any additional information that the Commission may request, as well as live excel spreadsheets to assist the Staff. Columbia also requests that additional time be built into the procedural schedule to allow for data requests on Columbia's direct testimony, providing all parties an opportunity to develop the record.

² KRS 278.430

8. It is not Columbia's intent to prolong a decision on its EECPRC and believes July 23, 2018 a reasonable date by which to file testimony. A proposed amended procedural schedule is attached hereto as Appendix A.
9. For all of the reasons stated herein, Columbia respectfully requests that the Commission amend the procedural schedule to allow for direct pre-filed testimony.

Dated this 19th day of June.

Respectfully submitted,



Brooke E. Wancheck

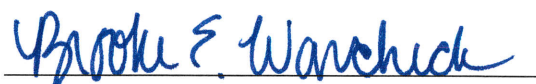
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**COLUMBIA GAS OF
KENTUCKY, INC.**

CERTIFICATE OF SERVICE

This certifies that Columbia Gas of Kentucky, Inc.'s electronic filing is a true and accurate copy of the documents to be filed in paper medium; that the electronic filing has been transmitted to the Commission on June 19, 2018; that a paper copy of the filing will be delivered to the Commission within two business days of the electronic filing; and that no party has been excused from participation by electronic means.



Brooke E. Wancheck

Attorney for
COLUMBIA GAS OF KENTUCKY, INC.

APPENDIX A

COLUMBIA'S PROPOSED AMENDED PROCEDURAL SCHEDULE

Columbia shall file direct testimony no later than 07/23/18

Requests for information to Columbia
shall be filed no later than..... 08/06/18

Columbia shall file responses to requests
for information no later than..... 08/16/18

The parties shall file a request for
either an evidentiary hearing or that the matter can be
decided upon the record no later than 08/21/18