

COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

In the matter of:)
)
THE ELECTRONIC APPLICATION OF COLUMBIA)
GAS OF KENTUCKY, INC. FOR: 1) A DECLARATION)
THAT CONSTRUCTION OF A LOW PRESSURE)
SYSTEM SAFETY IMPROVEMENT IS AN EXTENSION)
OF ITS SYSTEM IN THE ORDINARY COURSE OF)
BUSINESS; 2) IN THE ALTERNATIVE, FOR THE) Case No. 2019-00257
ISSUANCE OF A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY FOR SUCH)
CONSTRUCTION; 3) APPROVAL OF AN)
AMENDMENT AND EXPANSION OF ITS)
ACCELERATED MAIN REPLACEMENT TARIFF TO)
ITS SAFETY MODIFICATION AND REPLACEMENT)
TARIFF; AND (4) APPROVAL TO MODIFY THE 2019)
AMRP CONSTRUCTION PLAN)

**COLUMBIA GAS OF KENTUCKY, INC.'S
MOTION FOR A DECISION ON THE RECORD**

Now comes Columbia Gas of Kentucky, Inc. ("Columbia"), by counsel, and, pursuant to the August 2, 2019 Procedural Order, hereby moves the Kentucky Public Service Commission ("Commission") to decide the above captioned proceeding on the record already established in this case and without the need for a formal hearing, respectfully stating as follows:

On July 29, 2019, Columbia filed an Application for: 1) A Declaration that Construction of a Low Pressure System Safety Improvement is an Extension of its System in the Ordinary Course of Business; 2) In the Alternative, for the Issuance of a Public Convenience and Necessity (“CPCN”) for Such Construction; 3) Approval of an Amendment and Expansion of its Accelerated Main Replacement Tariff to its Safety Modification and Replacement Tariff; and 4) Approval to Modify the 2019 AMRP Construction Plan (“Application”). On August 2, 2019, the Commission issued an Order establishing a procedural schedule. The schedule provided a deadline for intervention and two sets of data requests. There were no intervenors in the case and Columbia answered one set of data requests from the Commission. Columbia did not receive a second set of data requests from the Commission by the date established by the procedural schedule. Additionally, a date has not been established for a hearing in this matter. At this point, there are no additional procedural steps to be undertaken.

Columbia believes that the record sufficiently and accurately evidences that no CPCN is required for the LP System Project and that a declaratory order stating this is appropriate. However, in the event the Commission believes a CPCN is necessary, Columbia also believes the record fully demonstrates that the LP System Project is needed and will not result in wasteful duplication. Moreover, the record further underscores the merits of allowing Columbia to amend its AMRP Construction Plan and convert its Accelerated Main Replacement Tariff to a Safety Modification and Replacement Tariff.

Accordingly, Columbia is willing to waive its right to a hearing, thereby allowing both the Commission and Columbia to save significant time and resources. However, should the Commission or Commission Staff have any remaining questions concerning the application or the relief sought by Columbia, the Company would be willing to participate in an informal conference in lieu of a formal hearing.

As set forth in Columbia's Application, the Commission is respectfully requested to issue a final order on or before October 28, 2019.

Respectfully submitted,



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