

**COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO THE ATTORNEY GENERAL'S
INITIAL INFORMATION REQUESTS
DATED DECEMBER 17, 2019**

1. Refer to Staff 2-1. Explain why Columbia does not also maintain a crisis program in addition to a recurring benefits program.

Response:

Columbia seeks to offer a program that provides participants assistance in hopes of avoiding a crisis situation. However, should a customer be in crisis and facing termination of service, Columbia works individually with the customer to identify other resources where funds may be available including, but not limited to, the WinterCare Energy Fund, a crisis program which is administered by the Community Action Council (CAC) for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties.

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2. Refer to CGK's Response to Staff 1-7. Provide the number of available slots in the CGKHEA program for each of the past 5 years.

a. Explain how much of any increase in slots for each of the past 5 years is due to rolling unexpended funds/credits from one program year to the next.

b. Explain whether CGK increased the number of slots in the HEA program for any reason other than having unexpended funds. If so, fully describe any such reason.

Response:

Year	Available Enrollment Slots
2014	2000
2015	2000
2016	2000
2017	2000
2018	1500

a. The primary reason for the increase in enrollment openings for each of the past 5 years is due to the rolling of unexpended credits from one program year to the next and the low natural gas commodity prices.

b. The design of Columbia's HEA program allows enrollment to be adjusted beyond the program target of approximately 850 low-income customers by rolling unexpended funds and balancing with the expected commodity prices.

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3. Refer to CGK's Response to Staff 1-9. If neither CGK nor its administrator measure how applicants learned of the HEA program, explain how CGK ensures that customers who may qualify for the HEA program have been sufficiently engaged and educated on the available benefits, and how it gauges the effectiveness of its communication efforts.

Response:

As described in Response to Staff 1-8 Columbia uses a variety of methods to reach those customers who may qualify for its HEA program. Participation in the program is on a voluntary basis, and as far as is known, once enrolled, no customer has complained that they were uneducated and asked to be removed from the program. Columbia gauges the effectiveness of its communications by the number of enrollments. When enrollments are slow or lagging, Columbia investigates and may adjust outreach or the area allocation allotments to maximize the distribution of funds.