

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: )  
 )  
AN ELECTRONIC INVESTIGATION OF HOME )  
ENERGY ASSISTANCE PROGRAMS OFFERED BY ) Case No. 2019-00366  
INVESTOR-OWNED UTILITIES PURSUANT TO KRS )  
278.285(4) )

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**INITIAL COMMENTS OF COLUMBIA GAS OF KENTUCKY, INC. AND  
SUPPLEMENTAL RESPONSE TO REQUEST ONE OF COMMISSION STAFF'S  
INFORMATION REQUEST SET THREE**

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Now comes Columbia Gas of Kentucky, Inc. ("Columbia"), and hereby submits the following comments and recommendations in accordance with the procedural schedule set forth in the Commission's October 28, 2019 Order.

Columbia appreciates the Commission's review of the Home Energy Assistance ("HEA") programs and the opportunity to comment on the process. Columbia believes its comments will be more meaningful after the February 25, 2020 Formal Conference and therefore reserves the right to file reply comments on March 4, 2020, as contemplated by the October 28, 2020 Order.

While Columbia does not currently have any general comments regarding the Home Energy Assistance program, Columbia does seek to supplement its response to question one of Commission Staff's Information Requests Set Three relating to

Community Action of Kentucky Inc.'s (CAK) Response to Staff's First Request for Information, Attachment A. Columbia offers the following supplemental response:

1) Demand Side Management – No comment

2) Crisis-Style Programs – The recommendation appears to be directed to Wintercare, as such, Columbia has no comment.

3) Enrollment with Recurring Benefit

Client Prioritization – Columbia needs to understand this better in order to comment. Columbia does not prioritize enrollments so this must be a concern of the Community Action Council (“CAC”) that has not been shared previously with Columbia.

Eliminate the recertification concept – Columbia is willing to discuss this recommendation, but it seems that there should be somewhat less time involved to recertify a client that is already in the database by updating information as opposed to complete data entry for a new client.

Timeframe – Columbia's program already operates as recommended.

Client Credits- Columbia's program already operates as recommended

4) Overall Recommendations

a) Columbia does not require actual weatherization services to be performed for enrollment but does require the customer sign up and apply for weatherization services. This was an original requirement when weatherization funds were plentiful so that the customer could benefit from weatherization if it was available. Columbia is willing to discuss removal of this requirement.

b) Columbia does not require enrollment in budget billing, it is at the option of the customer.

c) Columbia's eligibility requirements follow the LIHEAP requirements, not 115%.

d) Benefit amounts are determined annually as explained in Columbia's Response to the Commission Third Request for Information, Question No. 6.

e) Columbia believes the requirement to direct LIHEAP subsidy payments to the utility should rightfully be directed to the utility providing the home heating fuel source of the customer.

f) Columbia believes the requirement to apply for LIHEAP, subsidy or crisis depending upon the month of intake, should remain intact to afford the customer the greatest possible access to assistance resources. If LIHEAP funds are depleted, and applications are no longer being accepted, a simple communication of such would satisfy the requirement to apply for LIHEAP.

g) Columbia is willing to discuss the administrative recommendations as improvements to the overall processes and reporting, to contain costs, and boost overall efficiency.

Dated February 19, 2020

Respectfully submitted,



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INC.

CERTIFICATE OF COMPLIANCE

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 February 19, 2020; 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

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