

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

In the matter of: )  
 )  
ELECTRONIC EMERGENCY DOCKET ) Case No. 2020-00085  
RELATED TO THE NOVEL CORONA )  
VIRUS COVID-19 )

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**MOTION OF COLUMBIA GAS OF KENTUCKY, INC.  
FOR DEVIATION**

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Now comes Columbia Gas of Kentucky, Inc. ("Columbia"), and requests a deviation from the Commission's September 21, 2020 Order in the above captioned matter. Additionally, Columbia requests expedited treatment of this motion. In support of its motion and request for expedited treatment, Columbia states as follows:

1. On September 21, 2020 the Commission issued its Order in Case No. 2020-00085 requiring utilities to create payment plans of no less than six months and no longer than two years for customers that accumulated arrearages for service rendered on or after March 16, 2020, and before October 1, 2020. In compliance with the Commission's Order, Columbia notified its impacted customers that they would be placed on a nine-month default payment plan in the November billing cycle.
2. Pursuant to the Commission's Order in Case No. 2019-000366, Columbia received enrollment files for its Energy Assistance Program. Community Action Kentucky has identified 1158 customers for enrollment out of a total of 1210 available enrollment slots. The accounts must process for enrollment in Columbia's billing system on December 29, 2020 to be enrolled for Columbia's January 2021 billing cycle that begins on December 30, 2020 in order for the applicable credit to be applied to participant bills.
3. On December 21, 2020, Columbia conducted a test run in its billing system in preparation for the actual enrollment run of customers in the Energy Assistance Program. The results of the test run were that 427 applications were rejected, meaning only 731 customers would actually be enrolled.

4. Columbia has determined that the high rate of rejection is due to customers having been placed on the default payment plan. The applicants otherwise would be valid enrollments. Columbia's billing system is capable of generating a customer bill for an account that is simultaneously on the Budget Payment Plan and the Energy Assistance Program, but is not capable of rendering a bill on any other payment plan simultaneously with the Energy Assistance Program. This is the reason that the applications were rejected.
5. Based upon its investigation and working with CAK, Columbia seeks the Commission's approval to manually remove from the default payment plan, any customer that has been placed on the default payment plan but is otherwise eligible to be enrolled in its Energy Assistance Program. The greatest benefit to the customer is to be enrolled in the Energy Assistance Program. The Energy Assistance Program provides participants a \$200 per month credit in the months of January, February and March.
6. If Columbia does not take action to remove the payment plan, the customers will be unable to enroll in the Energy Assistance Program and will remain on the default payment plan. The default payment plan requires the customer to pay 1/9<sup>th</sup> of the pre-November arrearage plus the current month bill or be subject to disconnection of service.
7. Columbia regrets the urgent nature of this request but believes it to be in the best of interests of its customers. The proposed removal of the rejected accounts from their current payment plan will require a manual review of each account in order to allow for the enrollment in the Energy Assistance Program to occur. Columbia believes it requires the Commission's authorization to remove a customer from a payment plan that was required by the Commission's Order in Case No. 2020-00085. In April 2021, Columbia will review each account that is removed from the default payment plan and enrolled in the Energy Assistance Program and will work with the customer to establish another payment plan, if needed, for any remaining arrearage.

WHEREFORE, Columbia therefore requests expedited approval of its proposal to permit eligible customers to enroll in the Energy Assistance Program and be removed from the nine-month payment plan.

Dated at Columbus, Ohio, this 28th day of December 2020.

Respectfully submitted,

**COLUMBIA GAS OF KENTUCKY, INC**

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