

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of: )  
)  
THE ELECTRONIC APPLICATION OF )  
COLUMBIA GAS OF KENTUCKY, INC. FOR AN )  
ADJUSTMENT OF RATES; APPROVAL OF )  
DEPRECIATION STUDY; APPROVAL OF TARIFF ) Case No. 2021-00183  
REVISIONS; ISSUANCE OF A CERTIFICATE OF )  
PUBLIC CONVENIENCE AND NECESSITY; AND )  
OTHER RELIEF )  
)

---

MOTION FOR DEVIATION

---

Comes now Columbia Gas of Kentucky, Inc., (“Columbia”), by counsel, pursuant to 807 KAR 5:001 Section 15, 807 KAR 5:001 Section 22 and other applicable law, and for its Motion requesting that the Kentucky Public Service Commission (“Commission”) grant a deviation from 807 KAR 5:001 Section 15(2)(d)2., respectfully states as follows:

1. Columbia filed its Notice of Intent and its Election to Use Electronic Filing Procedures in this matter on April 28, 2021.
2. Columbia is filing its Application in this matter contemporaneously with this Motion.
3. As part of the Application, Columbia is requesting a Certificate of Public Convenience and Necessity (“CPCN”) to authorize Columbia to renovate its existing

Lexington headquarters and to construct small structures in order to install and operate a new safety training facility for its employees.

4. The safety training facility will enable Columbia to have a training facility for its employees without requiring employees to travel to other states to obtain needed training.

5. Columbia has not yet developed detailed engineering plans and specifications and therefore is unable to provide these to the Commission in accordance with the regulation at this time. The proposed facility will be self-contained within the existing footprint of the Company's headquarters in Lexington and will not impact the service of other utilities or result in any wasteful duplication of service. Accordingly, Columbia requests a deviation from this requirement in the Application filing.

6. Columbia will provide detailed engineering plans and specifications to the Commission once they are available.

WHEREFORE, on the basis of the foregoing, Columbia respectfully requests the Commission to grant a deviation from 807 KAR 5:001, Section 15(2)(d)2. with regard to filing detailed engineering plans and specifications.

This 28<sup>th</sup> day of May, 2021.

Respectfully submitted,



---

Mark David Goss

David S. Samford

L. Allyson Honaker

GOSS SAMFORD, PLLC

2365 Harrodsburg Road, Suite B-325

Lexington, KY 40504

(859) 368-7740

mdgoss@gosssamfordlaw.com

david@gosssamfordlaw.com

allyson@gosssamfordlaw.com

and

Joseph M. Clark

Assistant General Counsel

290 W. Nationwide Blvd.

Columbus, Ohio 43215

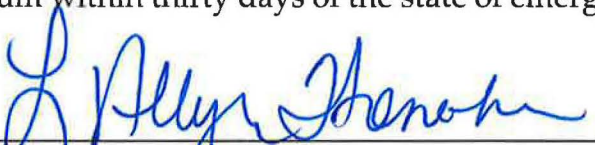
(614) 813-8685

josephclark@nisource.com

*Counsel for Columbia Gas of Kentucky, Inc.*

**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, this is to certify that the electronically filed documents (including this "Read1st" letter and its enclosures) are true and accurate copies of the same documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on May 28, 2021; that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means; and that the original versions of the documents transmitted electronically will be filed with the Commission in paper medium within thirty days of the state of emergency being lifted.

  
\_\_\_\_\_  
*Counsel for Columbia Gas of Kentucky, Inc.*