

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE COMMONWEALTH OF KENTUCKY

IN THE MATTER OF THE ELECTRONIC TARIFF
FILING OF COLUMBIA GAS OF KENTUCKY, INC.
TO EXTEND ITS SMALL VOLUME GAS
TRANSPORTATION SERVICE

Case No. 2021-00386

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED TO COLUMBIA GAS OF KENTUCKY, INC.
BY XOOM ENERGY KENTUCKY, LLC
(FIRST SET)**

Pursuant to 807 KAR 5:001, XOOM Energy Kentucky, LLC (“XOOM”) requests that Columbia Gas of Kentucky, Inc. (“Columbia”) answer the interrogatories and produce the documents requested herein by February 18, 2022, in accordance with the following:

I.
INSTRUCTIONS

(1) In responding to any of the questions in the attached interrogatories and requests for production of documents, please answer each question on a separate sheet of paper, restating the question in full. Please provide the name and title of the individual who has the responsibility for the subject matter addressed therein. Include with each response or group of contemporaneous responses the identity of the person making the response by name, occupation, and job title.

(2) These interrogatories and requests should be regarded by you as continuing and require further and supplemental responses as any additional information within their scope is generated or becomes available to you.

(3) With respect to any document related to any matter addressed in the attached interrogatories and requests for production, if the document is not in your possession, but you know or believe that it exists, you are requested to identify and indicate to the best of your ability the present or last known location of the document and its custodian.

(4) To your knowledge, if no documents containing the exact information exist, but documents exist that contain portions thereof or that contain substantially similar information, then the definition of “documents” to be identified shall include the documents that do exist.

(5) For any information that you claim is unavailable, state the reason why it is unavailable, and provide any information that is available that is similar to the requested information.

(6) If any document or other information called for is withheld on a claim of privilege, identify the document or other information withheld and each and every person listed as an addressor, addressee, or indicated on blind copies; identify all persons to whom distributed, shown, or explained; and identify the nature and legal basis of the privilege asserted. Set forth the factual and legal predicates to any claim of privilege or other immunity from discovery in sufficient detail for XOOM to ascertain Columbia’s right to such treatment, and provide redacted copies of requested materials or information. If any document or other information called for is to be produced with a claim of confidentiality, please notify XOOM as soon as possible to discuss a protective order. If Columbia intends to withhold documents or other information on the basis that such documents or other information are “voluminous,” provide information sufficient to enable XOOM, and other participants to assess the true nature of the objection. Without limiting the foregoing, this information should include a description of the documents, the approximate number of pages, number and thickness of volumes, and other such identifying information.

(7) If you assert that any document related to any matter addressed in any question in the attached interrogatories and requests for production of documents has been destroyed or transferred beyond your control, please state the following: (a) identify by full name, official title and address(es), any person who destroyed the document and any person involved in ordering the

destruction of the document; (b) state the time, place and method of, and reasons for, its destruction, including any and all documents relating to the order or act of such destruction; (c) if destroyed or disposed of by operation of a document destruction program or retention policy, identify and produce a copy of the guideline, policy or manual describing the document destruction program or retention policy; (d) if transferred, identify the person authorizing transfer, and state the time, place and method of, and reason for, its transfer, including any and all documents relating to the transfer; (e) identify each and every person listed as an addressor or addressee or indicated on blind copies, or to whom it was distributed, shown or explained; and (f) state or identify the date, subject matter, number of pages, attachments and appendices of the document.

(8) In responding to each question in the attached interrogatories and requests for production of documents, please provide all information available to you or in your possession, including information possessed by any agent, consultant, or employee.

(9) If a response to any of the attached interrogatories and requests for production of documents requires any calculations, analyses, assumptions or studies, please identify and provide copies of such calculations, analyses, assumptions or studies, and include all workpapers relating thereto.

(10) Whenever specific information, such as a date or figure, is requested and you are unable to give the exact information, give your best estimate thereof.

(11) Please provide one copy of each response to these interrogatories and requests for production of documents to each of the following:

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II. DEFINITIONS

(1) “You,” “your,” or “Columbia” means Columbia Gas of Kentucky, or any of your employees, agents, consultants or experts.

(2) When capitalized, “Commission” refers to the Kentucky Public Corporation Commission.

(3) “Document” includes any written, recorded or graphic matter, however produced or reproduced, including, but not limited to, correspondence, telegrams, contracts, agreements, notes in any form, memoranda, charts, diaries, reports, books, ledgers, diaries, voice recording tapes, microfilms, microfiche, pictures, data processing cards or discs, computer tapes and other computer-generated and stored information or data base, workpapers, calendars, minutes of meetings or any other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.

(4) “Identify,” “identity,” or “identification,” when used in reference to an individual person, means to state that person’s full name and business address, including zip code and phone number, if known, and present or last known business position and duties and business address, if known.

(5) “Identify,” “identity,” or “identification,” when used in reference to a business organization, means to state the corporate name or other names under which said organization does business, and the location of its principal place of business.

(6) “Identify,” “identity,” or “identification,” when used in reference to a document, means to state the type of document (*e.g.*, computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, *etc.*), or some other means of identifying it, and its present location and custodian. If any document was, but is no longer, in your possession or subject to your control, state what disposition was made of it, and, if destroyed or disposed of by operation of a retention policy, state the retention policy. For any interrogatories or requests which request identification of documents, you may, in lieu of identification, provide copies of the requested documents. Each document so produced shall be identified by the number of the data request to which it is purportedly responsive to.

(7) The terms “describe,” “describe in detail,” “explain,” and “explain in detail” mean describe and explain in detail each and every basis for the position taken or statement made and identify each and every statement, study and documents relied on by you and provide a copy of all such identified studies and documents.

III.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please provide the initial and revised responses to all formal or informal interrogatories or data requests made by any party to this proceeding, including the Commission Staff, when that response is provided to the requesting party.

2. Provide a sample bill for: (a) a non-shopping residential customer; and (b) a shopping residential customer.

3. How many natural gas Choice Program suppliers are licensed within Columbia’s

service territory?

4. For each month since January 2019, please provide, by customer class:
 - a. The number of distribution customers eligible to participate in the Choice Program;
 - b. The number and percentage of customers taking service with a supplier in the Choice Program;
 - c. The percentage of throughput taking service with a supplier in the Choice Program;
 - d. The number of suppliers actively serving customers; and
 - e. The number of new service connections per class.
5. Please confirm that new customers are required to take service from Columbia for the first month before enrolling with a supplier.
6. Please provide the number of customers who moved within Columbia's service territory for each month since January 2019.
7. How many days before the end of the month must a supplier submit an enrollment for it to be effective on the first day of the following month? For how long has this rule been in effect?
8. Does Columbia require customers to provide suppliers with their utility account number or other information unique to their service with Columbia in order to enroll their account with a supplier? If so:
 - a. What information does Columbia require to process an enrollment?
 - b. Does Columbia track the number of enrollments that cannot be completed due to the inability of a customer to locate their account number? If yes,

please provide the number of enrollments that have not been completed due to this issue since January 2019.

9. When a customer begins distribution service with Columbia, what information, if any, is the customer provided regarding the Choice Program and their opportunity to purchase gas from a third-party supplier?

10. Please provide any training and/or scripts used by Columbia representatives regarding the Choice Program.

11. Please identify business practices Columbia has implemented to make customers aware of the Choice Program.

12. Provide the advertising plan and customer education plan regarding the Choice Program and all other utility communications to customers. Provide bill inserts, direct mail pieces, print advertisements, electronic media, and any other communications with customer.

13. Describe the manner and format in which suppliers can access their customers' usage data. How do they do it and what usage information are they provided?

Respectfully submitted,

XOOM ENERGY KENTUCKY, LLC

By Counsel

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Counsel for XOOM Energy Kentucky, LLC

Dated: February 4, 2022

CERTIFICATE OF SERVICE

I hereby certify that XOOM's February 4, 2022 electronic filing is a true and accurate copy of the foregoing; that the electronic filing has been transmitted to the Commission on February 4, 2022; that pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, an original and one copy of the filing are excused from being mailed to the Commission; that there are currently no parties excused from participation by electronic service; and that, on February 4, 2022, electronic mail notification of the electronic filing is provided to all parties of record.

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