

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
(SECOND 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 March 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.

(0) “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.

(1) “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.

(2) 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 document relied on by you, and provide a copy of all such identified studies and documents.

III.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Columbia did not provide a complete response to XOOM 1-4. As previously requested, please provide the number of new service connections per class for each month since January 2019.

2. For each year since and including 2019, please provide the number of customers who ended service at one service address and re-established service at a new premise within Columbia’s territory.

3. If a customer who is taking commodity service from a CHOICE supplier moves from one premise to another within Columbia's service territory, must that customer return to taking service with Columbia before resuming service with a supplier? If so, how long must the customer take service with Columbia before being allowed to switch to a supplier?

4. Please provide a link to annual reports filed by Columbia with the Commission for 2019 through 2021 regarding the CHOICE program which include the number of customers in the CHOICE program, as well as volumes served by customer class.

5. Regarding the Customer CHOICE Survey ("Survey"), please provide the following information:

- a. The number of residential CHOICE customers who received the Survey.
- b. The number of residential non-CHOICE customers who received the Survey.
- c. The number of commercial CHOICE customers who received the Survey.
- d. The number of commercial non-CHOICE customers who received the Survey.

6. When a non-CHOICE customer calls Columbia, are Columbia representatives required to provide information about the CHOICE program if the customer does not ask for such information?

7. Regarding the response to Staff Set 2-5:

- a. Please provide the Excel version of the response.
- b. Provide all workpapers in Excel format used to calculate the response presented.
- c. In the workpapers indicate the specific marketer (by "A", "B", etc.) and the class of product (variable, fixed, green, *etc.*) for each bill determination.

8. Explain what customer-specific data Columbia receives from each supplier so that Columbia may determine the supply billing amount it renders.

9. Provide the instructions Columbia provides to suppliers regarding data exchange when they initiate CHOICE service for a customer, and to provide ongoing billing services for gas supply.

10. Does Columbia know the price, term, type of product (variable, fixed, green, fixed bill, other) for each CHOICE customer? Explain what Columbia does know regarding the types of products CHOICE customers have selected.

11. Regarding the response to XOOM Set 1-5, explain what tariff and/or system modifications (if any) would be needed for a shopping customer to receive supply from his/her supplier during the first month after service is initiated.

12. Regarding the response to XOOM Set 1-6, provide in Excel format the monthly data from January 2019 to present indicating:

- a. Total customer count by class.
- b. Customers that initiated service with Columbia during the month.
- c. Customers that discontinued service with Columbia during the month at their premise.

13. Regarding the response to XOOM Set 1-6, if a customer discontinues service at their premise and locates to a different premise with a Columbia meter and initiates service, how is that treated in the billing system? Is a new customer identification created or does an identifier remain with a customer as long as they are within the Columbia of Kentucky system? Provide Columbia's procedures document for the service initiation process, and service discontinuation process.

14. Regarding the response to XOOM Set 1-7, present a timeline beginning at the 15th day of a month and continuing to the 1st day of the following month, and indicate all activity that

is conducted each day to affect an enrollment of a customer.

15. Provide monthly data from January 2019 to present showing the method of contact (call center, web self-service, in person) that new customers used to initiate service. Explain any changes, either temporary or permanent, that Covid policies have caused.

16. Regarding the Gas Cost Adjustment (GCA), provide monthly data in Excel format of the GCA from January 2002 to present.

17. Provide Columbia's gas supply procurement practices manual/procedures that explains how Columbia determines the mix and source of its gas supply.

18. Regarding the CHOICE program, describe the nature and frequency of communication that Columbia of Kentucky has with the other NiSource gas and electric distribution companies that offer a CHOICE program, about program design and operation.

19. Regarding the response to XOOM Set 1-4, provide Attachment A in Excel format and include data for subpart (e) - the number of new service connections per class - that was omitted from Columbia's previous response.

20. Provide copies of all customer communications to all choice eligible customers (i.e., direct mail, bill stuffers, etc.) sent from January 2019 to present.

21. Provide monthly data indicating customers bill receipt method, paper via mail vs. electronic, from January 2019 to present.

22. Provide copies of all Columbia documents (call center scripts, employee manuals, website content, bill stuffers) designed to inform all CHOICE-eligible customers of the availability of electronic billing, and of automatic bill payment.

Respectfully submitted,

XOOM ENERGY KENTUCKY, LLC

By Counsel

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Counsel for XOOM Energy Kentucky, LLC

Dated: March 4, 2022

CERTIFICATE OF SERVICE

I hereby certify that XOOM's March 4, 2022 electronic filing is a true and accurate copy of the foregoing; that the electronic filing has been transmitted to the Commission on March 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 March 4, 2022, electronic mail notification of the electronic filing is provided to all parties of record.

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