

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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

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Case No. 2021-00386

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**REBUTTAL TESTIMONY OF JUDY M. COOPER  
ON BEHALF OF  
COLUMBIA GAS OF KENTUCKY, INC.**

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FILED: April 29, 2022

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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 ELECTRONIC TARIFF FILING OD COLUMBIA )  
 GAS OF KENTUCKY, INC. TO EXTEND ITS ) Case No. 2021-00386  
 SMALL VOLUME GAS TRANSPORATION )  
 SERVICE )  
 )

VERIFICATION OF JUDY COOPER

COMMONWEALTH OF KENTUCKY )  
 )  
 COUNTY OF FAYETTE )

Judy Cooper, Director of Regulatory Affairs of Columbia Gas of Kentucky, Inc., being duly sworn, states that she has supervised the preparation of her Rebuttal Testimony in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

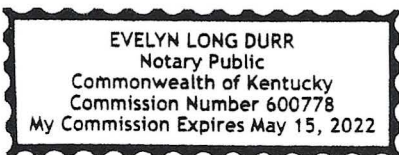
Judy Cooper  
 Judy Cooper

The foregoing Verification was signed, acknowledged and sworn to before me this 29 day of April, 2022, by Judy Cooper.

Evelyn Long Durr

Notary Commission No. 600 778

Commission expiration: 05/15/2022



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BEFORE THE PUBLIC SERVICE COMMISSION**

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**PREPARED REBUTTAL TESTIMONY OF  
JUDY M. COOPER  
ON BEHALF OF COLUMBIA GAS OF KENTUCKY, INC.**

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**COLUMBIA GAS OF KENTUCKY, INC.**

**April 29, 2022**

1 I. INTRODUCTION

2 **Q: Please state your name and business address.**

3 A: My name is Judy M. Cooper and my business address is 2001 Mercer Rd.,  
4 Lexington, KY 40511.

5 **Q: Did you provide Direct Testimony in this proceeding?**

6 A: Yes I did.

7 **Q: What is the purpose of your Supplemental Testimony in this**  
8 **proceeding?**

9 A: The purpose of my supplemental testimony is to address certain issues  
10 raised by intervenor testimony file on March 25, 2022 and in discovery  
11 responses by the intervenors.

12 **Q: Have you reviewed the testimony filed by James L. Crist filed in this**  
13 **docket ("Crist Testimony")?**

14 A: Yes I have.

15 **Q: Please direct your attention to Page 22 of the Crist Testimony. Do you**  
16 **agree that it is the job of Columbia to promote the CHOICE program to**  
17 **customers?**

18 A: No. Columbia's job is to provide safe, adequate, and reliable natural gas  
19 to its customers. Whether a customer elects to participate in the CHOICE  
20 program is a voluntary decision of that customer. Columbia makes

1 information available to customers about the program and participating  
2 suppliers, but it is not Columbia's job to promote the program. The  
3 program is available for CHOICE suppliers to offer options to customers  
4 that are not subject to price regulation. It is the job of the CHOICE  
5 supplier to promote its products.

6 **Q: Is it appropriate to recover the costs of educating customers about the**  
7 **CHOICE program from all customers through base rates?**

8 A: No. A longstanding goal in offering the CHOICE program has been to do  
9 so with no impact on rates to customers that did not choose to participate.  
10 In other words, all incremental costs are required to be borne by the  
11 program participants.

12 **Q: Do you agree that Columbia should engage in "ongoing stakeholder**  
13 **workshops aimed at developing detailed marketing materials that**  
14 **describe the [CHOICE] Program and the products and services available**  
15 **to customers"?**

16 A: As part of the administration of the CHOICE program, Columbia reviews  
17 sample marketing materials provided by all CHOICE suppliers to verify  
18 that the materials accurately describe the CHOICE program. The reviews  
19 are performed individually as the materials are presented. Columbia  
20 would not be opposed to considering possible alternatives or additions to

1 that process if invited to participate and there were no incremental costs to  
2 Columbia.

3 **Q: Does Columbia review all marketing materials, sales scripts, and other**  
4 **supplier materials related to the CHOICE program?**

5 A: Yes, Columbia reviews information made available about the CHOICE  
6 program and the materials provided to customers. Columbia does not  
7 make judgements about the marketing materials other than to assure that  
8 the materials are accurate in the description of the program and pricing is  
9 provided on a per MCF basis. When Columbia has identified concerns  
10 about a particular supplier piece, on every occasion it has successfully  
11 worked with that supplier to resolve the concern.

12 **Q: Should Columbia be required to provide all customer education**  
13 **materials about the CHOICE program to participating suppliers?**

14 A: Customer education information is public information. The content is  
15 available to everyone on Columbia's website.

16 **Q: Should Columbia's CHOICE program be extended indefinitely?**

17 A: As long and until both electricity and natural gas are widely available  
18 across Kentucky from non-regulated suppliers, Columbia's program  
19 should not be extended indefinitely but remain an option created under  
20 the rules of the Commission's Order in Administrative Case No. 367. In

1 most recent history, the extensions authorized by the Commission have  
2 been for periods of three years, but Columbia would be willing to extend  
3 the CHOICE program until March 31, 2027, as suggested by Mr. Crist.

4 **Q: Have you reviewed the testimony filed by Travis Kavulla filed in this**  
5 **docket (“Kavulla Testimony”)?**

6 A: Yes I have.

7 **Q: Please direct your attention to the last answer beginning at the bottom**  
8 **of Page 4. To your knowledge, are all offers to Columbia customers for**  
9 **fixed-rate contracts?**

10 A: The offers of participating marketers to Columbia’s customers are not all  
11 fixed-rate contracts. The offers vary frequently and may be either fixed or  
12 variable rate contracts.

13 **Q: Please refer to Figures TK-1 through TK-3 on Pages 8 and 9 of the**  
14 **Kavulla Testimony. Does Columbia track the total price paid by**  
15 **CHOICE participants as compared to Columbia’s CHOICE-eligible**  
16 **sales service customers?**

17 A: The total amount paid by CHOICE participants as compared to what  
18 those customers would have paid if they were sales service customers is  
19 an amount that Columbia reports annually to the Commission. It is not  
20 tracked on an individual basis but is an aggregate comparison of total

1 amounts billed to CHOICE customers compared to the same volumes at  
2 Columbia's tariff gas cost in each month for a 12-month period.

3 **Q: Please direct your attention to the recommendations starting on page 13**  
4 **of the Kavulla Testimony. Should Columbia be required to modify its**  
5 **call center scripts as proposed?**

6 A: No, the modifications suggested by Mr. Kavulla would require the call  
7 center rep to try to engage the customer in a longer conversation thereby  
8 increasing the length of the call which equates to increased cost and  
9 potentially longer hold times for other customers.

10 **Q: Is there a cost associated with updating call center scripts? Who should**  
11 **bear these costs should the Commission adopt this recommendation?**

12 A: Yes, and in addition to the updating of scripts there are additional costs  
13 for training and instruction to call center employees. Similar to, and as  
14 explained earlier in my testimony, these costs should be recovered from  
15 program participants.

16 **Q: Please direct your attention to the additional recommendations of**  
17 **Witness Kavulla, which are summarized, beginning on page 20. Would**  
18 **the implementation of these recommendations be accompanied by**  
19 **additional cost to Columbia, or the Public Service Commission?**



1 A: Yes. This point is recognized by XOOM Energy Kentucky, LLC  
2 (“XOOM”) in its responses to the Commission’s Data Requests, filed April  
3 18, 2022. In response to the Commission’s first request, XOOM stated that  
4 “[a]n effective, sustained consumer awareness program requires  
5 investment by all the major stakeholders in the CHOICE program;  
6 Columbia Gas of Kentucky, the gas marketers, and the Public Service  
7 Commission.”

8 **Q: Is it appropriate that Columbia or the Public Service Commission bear**  
9 **the costs associated with these recommendations?**

10 A: As I indicate above, the Commission’s original approval of the CHOICE  
11 program was specifically conditioned on the principle that there be no  
12 impact to rates for customers that did not choose to participate. XOOM’s  
13 recommendations would require that the costs to implement be socialized  
14 to all of Columbia’s customers, including those who choose not to  
15 participate in the CHOICE program. This would run afoul of a policy  
16 fundamental to this program. If the Commission allows the CHOICE  
17 program to continue, it should reject these recommendations

18 **Q: What would be required by Columbia and suppliers if the Commission**  
19 **does not allow the CHOICE program to continue?**

1    **A:**    If the Commission determines that Columbia’s CHOICE program should  
2           not be extended, then an orderly and smooth transition would allow for  
3           planned communications by Columbia and suppliers to customers, with a  
4           reasonable advanced notice. This would best be accomplished by  
5           establishing a schedule of actions and dates for the winding down of the  
6           program. Participating suppliers should be made aware of the date after  
7           which there would be no new customer enrollments, existing customers  
8           should be notified of the date when the program would be discontinued,  
9           and the changes should occur outside of the heating season and in  
10          consideration of Columbia’s billing cycle and the associated gas delivery  
11          month.

12   **Q.**    **Does this conclude your Rebuttal Testimony?**

13   **A:**    Yes.