

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF COLUMBIA)
GAS OF KENTUCKY, INC. TO EXTEND ITS) CASE NO. 2021-00386
SMALL VOLUME GAS TRANSPORTATION)
SERVICE)

RESPONSE TO JOINT MOTION FOR INTERIM AUTHORITY AND FOR EXPEDITED
CONSIDERATION OF COLUMBIA GAS OF KENTUCKY, INC.

Comes now Columbia Gas of Kentucky, Inc. (“Colombia”), by counsel, pursuant to 807 KAR 5:001, Section 5(2) and other applicable law, and does hereby tender its response to the Joint Motion for Interim Authority and for Expedited Consideration, respectfully stating as follows:

On February 28, 2022, Xoom Energy Kentucky, Interstate Gas Supply, Inc., and Constellation New Energy, Gas Division, LLC (collectively, “Intervenors”) filed a Joint Motion for Interim Authority and for Expedited Consideration (“Motion”) in the above identified docket dealing with the request to extend the Small Volume Gas Transportation Service (“CHOICE”) program beyond the current expiration of the CHOICE program on March 31, 2022 and during the pendency of this docket. In the Motion, Intervenors request that the Commission grant “interim authority for Columbia

to continue operating the CHOICE program until the conclusion of this proceeding.”¹ Columbia submits this Response in order to provide the Commission with additional information to assist in its decision-making process.

Currently, approximately 16,600 customers have chosen to participate in the CHOICE program. If the Commission denies or does not act upon the Motion prior to March 31, 2022, all participating customers will see a change in their gas commodity provider as they would be migrated to Columbia’s applicable general sales rate schedule. It is important to note that Columbia’s Tariff requires that all contracts between marketers and participating customers contain a provision that allows the contract to be terminated without penalty should the CHOICE program be terminated prior to the end of any contractual duration.² For this reason, customers should not face any additional administrative charge in order to effectuate this change as the contracts with customers should recognize this possibility.

Columbia does not review and is not provided each individual contract between marketers and participating customers. There may be residential, commercial, or government customers who have negotiated rates that are above Columbia’s tariffed general rate schedules, while others may be below Columbia’s tariffed general rate

¹ Joint Motion for Interim Authority and for Expedited Consideration, p. 9.

² Rates, Rules and Regulations for Furnishing Natural Gas for the Entire Service Area of the Company Filed with the Public Service Commission of Kentucky, First Revised Sheet No. 37, “Code of Conduct” at 7.

schedules. Some of these customers may use up to 25,000 Mcf per year. If the Commission chooses not to extend the CHOICE program prior to its expiration, these customers may see an increase or decrease in their monthly bills depending on their contract rate as compared to the applicable approved tariff rate. Further, if the Commission chooses not to extend the CHOICE program prior to its expiration, but the final order in this case provides for a reauthorization of the CHOICE program, current CHOICE customers who wish to participate again would be required to choose a marketer and complete a new enrollment process just like all other eligible customers.

This Response is offered to provide the Commission with additional information to assist in its decision on the Motion. Columbia supports continuation of the CHOICE program during the pendency of this proceeding.

Dated this 7th day of March, 2022.

Respectfully submitted,

/s/ Joseph M. Clark

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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, this is to certify that the electronically filed document is a true and accurate copy; that the electronic filing has been transmitted to the Commission on March 7, 2022; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

/s/ Joseph M. Clark
Counsel for Columbia Gas of Kentucky, Inc.