#### **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	) ) ) )	Case No. 2021-00386

# COLUMBIA GAS OF KENTUCKY, INC.'S RESPONSES TO XOOM'S SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

FILED: March 18, 2022

Respondent: Judy Cooper

## COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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.

#### Response:

Please see 2021-00386 PSC Xoom DR Set 2 No. 1 Attachment A.

Respondent: Judy Cooper

### COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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.

#### Response:

Please see Columbia's Response to Xoom's First Request for Information, Item 6.

COLUMBIA GAS OF KENTUCKY, INC.

RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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?

**Response:** 

A customer who requests that service be (1) changed from one address to another or (2)

connected at another location will receive gas supply service from Columbia. Customers

can provide the Supplier with the new address and account number. Customer

enrollments submitted on or before the 15th calendar day of the month are assigned to

the CHOICE Supplier effective with bills rendered on and after the next month's normal

meter reading date unless rejected based upon program parameters. For example,

customers submitted on or before March 15 would be billed at the CHOICE Supplier's

rates beginning with the billing month of April. Customers submitted after the 15th

calendar day of the month commence service from the CHOICE Supplier effective with bills rendered on and after the second succeeding month's normal meter reading date.

Response to Xoom's Data Request Set Two No. 4

Respondent: Judy Cooper

### COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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.

#### Response:

https://psc.ky.gov/Case/ViewCaseFilings/2017-00115/Post

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.

Response:

The online survey was designed to target both Choice and non-Choice customers, with a

representative sample of residential and commercial customers within each group. Self-

identification by respondents as to whether they were Choice or non-Choice participants

occasionally did not correspond to Columbia's enrollment data indicating some

customers were unaware of their participation or were previous participants but had since terminated their participation.

- a. 71 residential Choice participants
- b. 180 residential non-Choice; 42 "Don't Know"
- c. 2 commercial Choice participants
- d. 41 commercial non-Choice; 3 "Don't Know"

Response to Xoom's Data Request Set Two No. 6

Respondent: Judy Cooper

### COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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?

#### Response:

No. The Columbia representative responds to questions and concerns(s) raised by the customer.

Response to Xoom's Data Request Set Two No. 7

Respondent: Judy Cooper

### COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

R	egarding	the	resi	ponse	to	Staff	Set	2-	5:
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- 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.

#### Response:

- a-b. Please refer to 2021-00386 PSC Xoom DR Set 2 No. 7 Attachment A.
- c. Columbia does not retain this information by specific marketer and class of product.

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

#### Response:

Suppliers submit customer account numbers, associated rate codes, and price values per MCF for each rate code to Columbia.

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.

#### Response:

Instructions, on demand training, and reference materials are located on the NiSource Suppliers website, accessible here: www.nisourcesuppliers.com/kentucky.

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.

Response:

Columbia is not privy to Supplier's pricing options based on contractual agreements

made with CHOICE customers. Columbia maintains a neutral role in a customer's choice

of a Supplier and encourages its customers to evaluate products offered in the

competitive market. Please also refer to Columbia's Response to Xoom's Second Set of

Interrogatories, No. 8.

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.

Response:

System modifications would be needed including, but not limited to, changes in the

transaction files used to transmit data between suppliers and Columbia, enrollment

process changes, connect process changes, modification to bill statements, and updated

business rules for Columbia-produced notifications.

Response to Xoom's Data Request Set Two No. 12

Respondent: Judy Cooper

### COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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.

#### Response:

a-c. Please see 2021-000386 PSC Xoom DR Set 2 No. 12 Attachment A

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.

Response:

When a customer requests a transfer of service, a disconnect order is placed at the current

premise address and a connect order is issued for the new premise address. When a

customer initially establishes service with Columbia a customer account number

consisting of 15 digits is created. A portion of this number remains the same whenever

the customer locates to a new premise, if the connect order is associated with previous

service to the customer.

Respondent: Judy Cooper

### COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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.

#### Response:

This information is located in the Kentucky Choice Reference Manual located on the NiSource Suppliers website @ https://www.nisourcesuppliers.com/kentucky/choice

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.

#### Response:

Please refer to 2021-00386 PSC Xoom DR Set 2 No. 15 Attachment A. There have been no changes to the procedure for initiating connect orders related to COVID policies.

Response to Xoom's Data Request Set Two No. 16

Respondent: Judy Cooper

As to the Objection: Joseph M. Clark

COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

Regarding the Gas Cost Adjustment (GCA), provide monthly data in Excel format of the

GCA from January 2002 to present.

Response:

Objection. Columbia objects to the extent that "monthly data ... of the GCA" is

unreasonably vague and undefined in the instructions provided by Xoom. As a result,

Columbia is unable to determine what information this request seeks. For publicly

accessible information about the GCA, please refer to Columbia's quarterly Purchased

Gas Adjustment filings, please refer to the Commission's online docketing system,

available here: <a href="https://psc.ky.gov/PSC">https://psc.ky.gov/PSC</a> WebNet/CommissionRecords.aspx.

KY PSC Case No. 2021-00386 Response to Xoom's Data Request Set Two No. 17 Respondent: Judy Cooper

### COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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

#### Response:

Please refer to 2021-00386 Xoom DR Set 2, No. 17, Attachment A



#### **ENERGY SUPPLY SERVICES POLICY**

TITLE: PORTFOLIO MANAGEMENT

**EFFECTIVE DATE: JUNE 1, 2010** 

#### 1. Purpose

The purpose of this policy is to identify those planning activities that facilitate the proper management and use of current supply, transportation, storage and peaking assets of each of the Columbia Distribution Companies (Columbia Gas of Kentucky, Inc., Columbia Gas of Maryland, Inc., Columbia Gas of Ohio, Inc., Columbia Gas of Pennsylvania, Inc., and Columbia Gas of Virginia, Inc.) to ensure safe and reliable service to firm customers at the best possible cost considering various operational issues. This includes:

- Individual company analyses
- Purchasing the proper amount and type of supply predicated on planning scenarios for varying weather conditions
- Use or potential release of transportation assets
- Use or potential release of storage assets
- Use of peaking assets
- Consideration of Pipeline Scheduling Point, contract or POD specific issues

#### 2. Scope of Process

This process provides for the establishment of guidelines to be utilized by Supply Planning in the development and recommendation of supply plans to be used in carrying out the responsibility of providing safe and reliable service to firm customers at the best possible cost. Included in this process are the following monthly and/or seasonal activities:

- Monthly Planning
- Term Analysis
- Exchange Analysis
- Capacity Release
- Hedge Analysis
- Financial Analysis
- Regulatory Analysis

This information shall be provided to the VP ESS and Directors for review and approval.

#### 3. Responsibility

The overall responsibility of this process belongs to the Supply Planning Section of the Energy Supply Services Department.

#### 4. Activities

The activities listed below represent the basic requirements of this process. The frequency of these activities may vary from time to time based on the current information requirements of Energy Supply Services or other NiSource organizations requiring input from the Supply Planning Process. Other activities may be undertaken from time to time in response to individual Columbia Distribution Company requirements.

#### 4.1 Monthly Planning

A series of supply purchase options shall be developed on a monthly basis to provide input into the monthly decision process related to the purchase of supply, use of pipeline transportation assets, storage assets, peaking assets and any other supply or capacity assets available to each Columbia Distribution Company. These monthly supply options shall be developed individually for each Columbia Distribution Company. The timing of the Monthly Planning process will be consistent with the needs of the Gas Procurement function. From the supply purchase options developed, a Recommended Purchase Plan shall be presented to ESS Management for approval around the 20<sup>th</sup> of the month prior to gas flow.

Each month the SENDOUT® Model (or other tool) shall be updated to include current assumptions for key inputs, including: Price Forecast as determined by the Price Committee (consisting of Manager of Economic Analysis, Manager of Supply Planning and Natural Gas Trader), First of Month Storage Level, Available Pipeline and Storage Capacity, etc. The Recommended Plan will typically consist of the results of the Normal Weather Scenario and shall include Planned Purchases for Term and Spot Supplies, Planned Usage of Transportation Assets, Planned Usage of Storage Assets, Planned Usage of Peaking Assets, Potential Capacity Release, etc.

For each winter month (November through March) the Monthly Process shall develop additional supply plans for Warmer & Colder Weather Scenarios. These plans will be developed and considered to ensure reliable service and adherence to pipeline tariff and contractual provisions under a wide range of differing weather conditions. The Recommended Plan may incorporate the results from these alternate Weather Scenarios as needed for this protection.

Differing Price Scenarios shall also be developed and considered to test the Recommended Plan for reasonableness should prices vary measurably from the base price forecast. These alternate price scenarios shall consist of a High Price Forecast and Low Price Forecast determined by the Price Committee The Recommended Plan shall be considered under these alternative price conditions. The Recommended Plan may include the results from the Price Scenarios as needed to ensure reasonable cost to firm customers.

Storage utilization ranges shall be developed and provided for consideration in day to day operations. These ranges shall consist of Fast Withdrawal/Inject and Slow Withdrawal/Inject Scenarios. This information shall be provided as part of the End of Month Storage Projection developed twice weekly.

#### 4.2 <u>Term Analysis</u>

Annually a Term Analysis shall be developed in early spring to determine the amount of Term Supply required for the upcoming winter season. The Term Analysis shall be developed individually for each Columbia Distribution Company. A Design Day Balance shall be developed based on the most recent Peak Day Forecast and currently available capacities to determine the amount of Required FTS. The Required FTS, inclusive of pipeline fuel, shall determine the amount of Term Supply. The Term Supply shall be fully available for January and depending on the results of the seasonal analysis may be reduced in other winter months equal to the supply required on the 2<sup>nd</sup> Design Day.

Weather scenarios (Normal, Warmer & Colder Weather Scenarios) shall be developed to ensure reliable service and adherence to pipeline tariff and contractual provisions under differing weather conditions. These scenarios will incorporate November 1<sup>st</sup> beginning storage inventory levels of 98-99%. The Term Analysis shall include a schedule showing the seasonal balance for each weather scenario.

The Term Analysis shall also include a Monthly "Swing Analysis" based on the selected Term Supply to ensure adequate supply flexibility. The Swing Analysis shall be based on 1 in 10 Risk Minimum Demands and will compare this demand to the Forecasted Supply to determine the Swing Requirement. The Swing Requirement should be considered in selecting the Term Level.

#### 4.3 Exchange Analysis

Recognizing the incentive sharing mechanisms specific to each Columbia Distribution Company, annually an Exchange Analysis shall be developed in early spring to determine the level of potential seasonal exchange activity, if any. The supply levels to be used in this analysis shall be those determined in

the annual Term Analysis. The Exchange Analysis shall be developed individually for each Columbia Distribution Company.

The Colder Weather supply plan from the Term Analysis shall be used in developing the potential seasonal exchange level and to determine the potential timing of an exchange. The Colder Weather Supply Plan is used to ensure reliable service to firm customers.

#### 4.4 <u>Capacity Release</u>

A Capacity Release Analysis for each season shall be developed in early spring for summer releases and in early fall for winter releases. A complete year shall be developed and evaluated in each analysis. The Capacity Release Analysis shall be developed individually for each Columbia Distribution Company.

The Capacity Release Analysis shall be based on the most recent Peak Day Forecast and Colder Weather supply plan. Any capacity in excess of the Peak Day Forecast of firm demand shall be available for release on a Non-Recallable basis. Recallable capacity shall be determined based on the estimated firm demands associated with the 5<sup>th</sup> coldest day for each month.

#### 4.5 Hedge Analysis

As needed, a Hedge Analysis shall be developed, typically annually, for each Columbia Distribution Company. Depending on the specifics of the individual approved Hedging Plan, the Hedge Analysis determines the volume to be hedged for the upcoming 2 or 3 hedge periods.

#### 4.6 Financial Plan

Financial Plan(s) shall be developed in accordance with the requirements of Financial Planning Process providing purchase, storage and cost information for the Financial Planning Process. The Financial Plan shall be developed individually for each Columbia Distribution Company.

The SENDOUT® Model (or other tool) shall be updated to include current assumptions for key inputs, including: Price Forecast (NYMEX date as suggested by the Financial Planning Section), First of Month Storage Level, Available Pipeline and Storage Capacity, etc.

#### 4.7 Regulatory Analysis

Regulatory Analyses shall be developed for various regulatory needs providing purchase, storage and cost information, etc. These analyses include GCR, PGA, 1307f filings, Strategic Gas Supply Plans, COH Long Term

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Forecast Report, CGV Five Year Forecast, etc. These analyses shall be developed as needed and shall be developed individually for each Columbia Distribution Company.

The SENDOUT® Model (or other tool) shall be updated to include current assumptions for key inputs, including: Price Forecast, First of Month Storage Level, Available Pipeline and Storage Capacity, etc.

Approved By:

Michael D. Watson

Vice President, Energy Supply Services

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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.

Response:

The daily operation of the CHOICE program for each of the affiliates is handled by the same team across all of NiSource. This team communicates on a daily basis about a wide range of topics.

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.

Response: For an Excel format version of 2021-00386 PSC Xoom DR Set 1, No. 4

Attachment A, please see 2021-00386 PSC Xoom DR Set 2, No. 19 Attachment A. For the

data related to subpart (e), please see Columbia's Response to Xoom Set 2 No. 1

Attachment A.

Response to Xoom's Data Request Set Two No. 20

Respondent: Judy Cooper

As to the Objection: Joseph M. Clark

COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

Provide copies of all customer communications to all choice eligible customers (i.e., direct

mail, bill stuffers, etc.) sent from January 2019 to present.

Response: Objection. Columbia objects to the extent that the request for "all customer

communications" is overly broad and unduly burdensome. Columbia further objects on

the basis that not all customer communications are relevant to this proceeding.

Notwithstanding and without waiving this objection, Columbia responds as follows:

Columbia utilizes its customer newsletter, website, and monthly bills to communicate to

customers about its CHOICE Program. Every CHOICE eligible customer receives the

following communication on every bill.

Two messages appear in the Message Board section of every bill, both paper and

electronic:

### Message Board

- Enjoy the convenience of managing your account online by enrolling in Paperless Billing. Monthly email alerts, 24/7 account access and up to two years of past bills and payment history! Enroll today at ColumbiaGasKY.com/PaperlessBilling.
- Never worry about missing a payment or writing a check again by enrolling in Automatic Payment today at ColumbiaGasKY.com.
- Take the seasonal highs and lows out by dividing your yearly energy use into 12 equal monthly payments - for budgeting that's a whole lot easier. Enroll today at ColumbiaGasKY.com/Budget.
- Natural gas prices for participating Customer CHOICE Program suppliers can be found at http://psc.ky.gov/Home/ColumbiaChoice

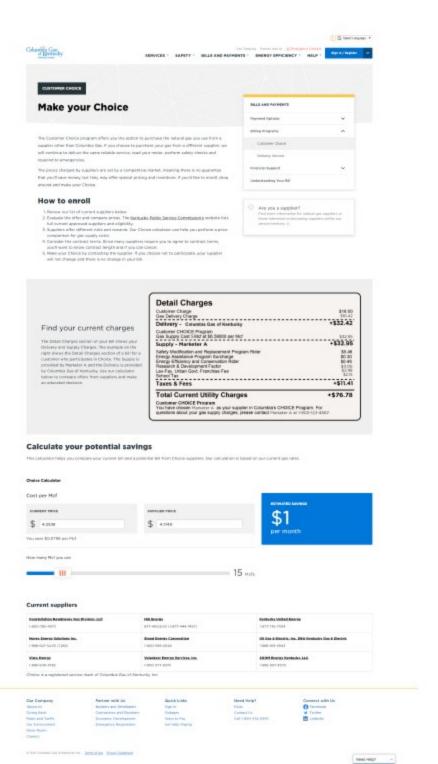
Customer Statement Date: 08/27/2020

Additional information is provided in the sidebar of the customer bill near the Detail Charges section, both paper and electronic. under Helpful Definitions –

**Gas Supply Cost** includes the cost of natural gas, interstate pipeline charges, storage costs, and related charges and is passed through to customers at cost without markup.

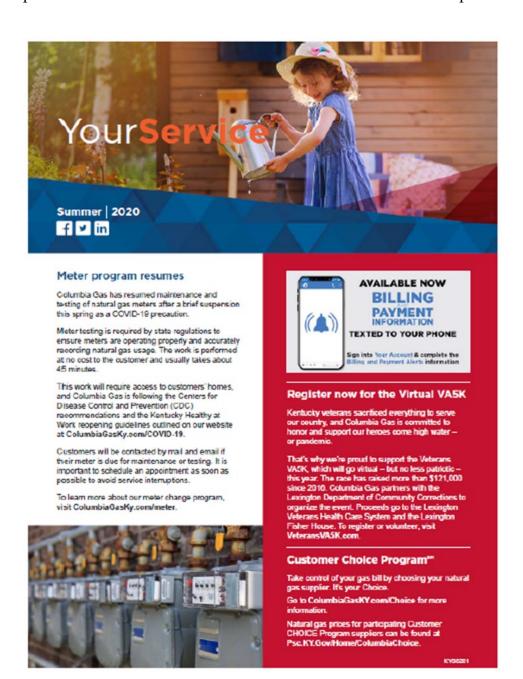
Gas supply service may be purchased from a participating competitive gas supplier in the Customer CHOICE program.

Columbia's website content may be viewed by following this link: <a href="https://www.columbiagasky.com/bills-and-payments/billing-programs/choice">https://www.columbiagasky.com/bills-and-payments/billing-programs/choice</a> and is provided below:



Additional CHOICE Program information is included with Columbia's in-bill newsletter.

The newsletter is also distributed via email to those customers who have elected to provide Columbia their email information. Please see the sample below.



Response to Xoom's Data Request Set Two No. 21

Respondent: Judy Cooper

### COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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

#### Response:

Please refer to 2021-00386 Xoom DR Set 2, No. 21, Attachment A.

Response to Xoom's Data Request Set Two No. 22

Respondent: Judy Cooper

As to the Objection: Joseph M. Clark

COLUMBIA GAS OF KENTUCKY, INC. RESPONSE TO XOOM'S SECOND REQUEST FOR INFORMATION DATED MARCH 4, 2022

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.

Response:

Objection. Columbia objects to the extent that providing "all" documents designed to

inform CHOICE-eligible customers of electronic and automatic billing options is overly

broad and unduly burdensome. Further, Columbia objects to this request as information

related to electronic billing and automatic bill payment methods is irrelevant to this

proceeding. Notwithstanding and without waiving this objection, Columbia responds as

follows:

All Columbia customers receive the same messages informing them of the availability of

electronic billing and automatic bill payment. Please refer to 2021-00386 Xoom DR Set 2,

No. 22, Attachments A through D, which contain a sample of the communications

provided to customers.

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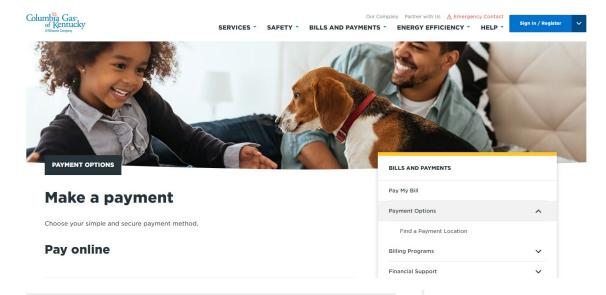
Please see Columbia's Response to Xoom Set 2 No. 20 for the same messages highlighted below as they are presented in the Message Board included on CHOICE eligible bills and presented below in the Message Board included on CHOICE participant bills:

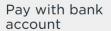
### Message Board

- We've made it easier for you to sign up for paperless billing! Enjoy the convenience of managing your account online! You will receive monthly email alerts, have 24/7 account access and up to two years of past bills and payment history. Sign up at GoPaperFreeToday.com!
- Never worry about missing a payment or writing a check again by enrolling in Automatic Payment today at ColumbiaGasKY.com.
- Having trouble making ends meet? Take advantage of our special payment arrangements or energy assistance programs. Call 1-800-432-9345 to see if you're eligible.
- Natural gas prices for participating Customer CHOICE Program suppliers can be found at http://psc.ky.gov/Home/ColumbiaChoice.

# Save a Stamp. It's a Click Away! GoPaperFreeToday.com Place stamp here. Post Office will not deliver mail without GOPA BELLA 1-1/8 x 3-1/8 poly patched window 4-7/8 left 9/16 bottom

Save a Stamp. It's a Click Away! <b>GoPaperFreeToday.com</b>	
IMPORTANT: BILL ENCLOSED	PRESORTED FIRST-CLASS MAIL U.S. POSTAGE PAID NISOURCE

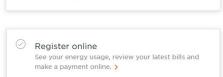




After you create your online account, you'll need your bank account number and routing number to make a payment.

Pay Now





Facing shut off?

Understanding Your Bill

If you've received a termination notice, you can learn more about the shut off and reconnect process. >



#### Pay with credit card, debit card, PayPal, Venmo or Amazon Pay

You can pay online using your credit card, debit card, PayPal, Venmo or Amazon Pay. Our payment processing vendor Paymentus will charge a convenience fee of \$1.75 per transaction.

Pay Now



#### Pay automatically

AutoPay allows us to automatically withdraw your payment from your checking or savings account each month.

Enroll Today