

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the matter of: :

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

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**RESPONSE OF INTERSTATE GAS SUPPLY, INC.  
AND  
CONSTELLATION NEW ENERGY, GAS DIVISION, LLC  
TO THE COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
DATED JULY 28, 2023**

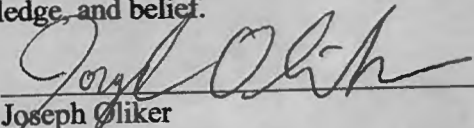
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**Filed: August 18, 2023**

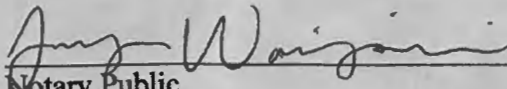
VERIFICATION

STATE OF Ohio )  
COUNTY OF Franklin )

The undersigned, Joseph Olikier, being duly sworn, deposes and says that he is in-house Counsel for Interstate Gas Supply, Inc., the foregoing responses of Interstate Gas Supply Inc. to Staff of the Kentucky Public Service Commission's Post Hearing Request for Information was prepared by him or under his direction, and that the information and answers contained therein are true and correct to the best of his information, knowledge, and belief.

  
\_\_\_\_\_  
Joseph Olikier

Subscribed and sworn to before me, a Notary Public in and before said County and State,  
this 18 day of August 2023.

  
\_\_\_\_\_  
Notary Public

Notary Public ID No. 2022RE8549

My Commission Expires:

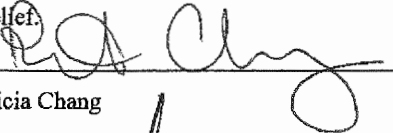
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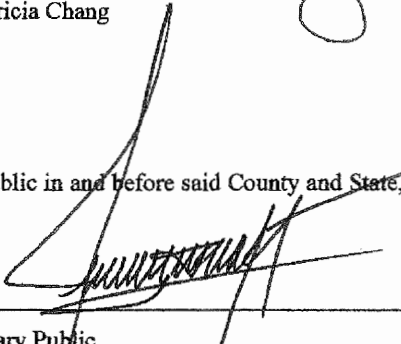
VERIFICATION

STATE OF Florida )  
COUNTY OF Broward )

The undersigned, Patricia Chang, being duly sworn, deposes and says that she is senior regulatory affairs manager for CNEG, LLC, the foregoing responses of CNEG, LLC. to Staff of the Kentucky Public Service Commission's Post Hearing Request for Information was prepared by her or under her direction, and that the information and answers contained therein are true and correct to the best of her information, knowledge, and belief.

  
\_\_\_\_\_  
Patricia Chang

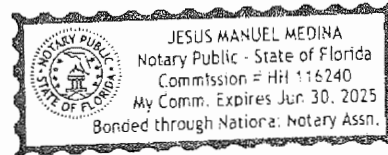
Subscribed and sworn to before me, a Notary Public in and before said County and State,  
this 17<sup>th</sup> day of August 2023.

  
\_\_\_\_\_  
Notary Public

No. HA 116240

Notary Public ID

My Commission Expires: June 30, 2025



**INTERSTATE GAS SUPPLY, INC.  
AND  
CONSTELLATION NEW ENERGY, GAS DIVISION, LLC**

**Response to the Commission Staff’s Post-Hearing Request for Information  
to Interstate Gas Supply, Inc.  
and  
Constellation New Energy, Gas Division, LLC  
Dated July 28, 2023**

**Case No. 2021-00386**

**Request No. 1**

**Responding Witness: Joseph Olikier**

Request No. 1: Provide the amount IGS has spent on education efforts directed at Columbia Kentucky’s service territory over the last five years.

Response No. 1: IGS does not track its spending by specific territories, therefore we do not have the specific information requested. However, in 2017, IGS transitioned to an in-person sales force comprised of Home Energy Consultants (“HEC”). HECs are passionate about educating people of the choices they have when it comes to their home’s energy – and with a focus on integrity and transparency. This means that HECs are honest with customers, even if that means recommending an option other than an IGS Energy product. HECs are equipped to help customers determine what services and products work best for them, their home, and their budget. IGS previously employed four HECs full time in the Kentucky market. Around 2020, Columbia Gas of Kentucky (“CKY”) imposed a prohibition on in-person sales at customer premises. Although IGS has requested that CKY permit in-person sales to resume, CKY has refused.

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**Request No. 2**

**Responding Witness: Joseph Olikier**

- Request No. 2: Provide a copy of the renewal letter or the communication which notifies IGS's Columbia Kentucky CHOICE Program customers that their current contract is expiring and the next steps required to receive a new offer from IGS. Include with the response what happens to the customers' gas commodity service if they do not enter into a new contract with specific elections as to price, fixed versus variable pricing, and contract length.
- Response No. 2: IGS has attached its renewal letter to this response. The letter identifies how a customer can enroll in a new carbon-neutral fixed rate product through the IGS website or call center. The letter further indicates that if a customer takes no action they will continue on a monthly variable rate per the initial terms and conditions of the contract.

August 09, 2023

Dear John Smith,  
Thanks for being an IGS Energy natural gas customer!

As a carbon-neutral customer you're helping to make the world a cleaner place!

We're happy to provide you with a fixed rate to help protect your budget. That's why we're reaching out to let you know your current term expires at the end of the October 2023 billing period.

### Your Options

- 1. CHOOSE A NEW CARBON-NEUTRAL FIXED RATE:** To keep the predictability of a fixed rate plan, check out our latest offers at [IGS.COM/signup](https://www.igs.com/signup), or give us a call at **877.786.4447** by October 8, 2023. Our Customer Care team is available Monday-Friday, 8am-8pm and Saturday, 9am-3pm EST.
- 2. TAKE NO ACTION:** Per your initial terms and conditions, you'll automatically continue on a monthly variable rate.



### PAPERLESS!

It's easy to save a tree when you access future IGS communications and documents digitally. Create a MyAccount by visiting [igs.com/login](https://www.igs.com/login).

Once logged in, go to Profile and set your communication preferences.

Thanks for your business and we look forward to the opportunity to continue serving you.

IGS Customer Care

Your IGS Customer ID is: 2948401

PO Box 9060 Dublin, OH 43017  
Address Service Requested

### IMPORTANT NOTICE REGARDING YOUR NATURAL GAS SERVICE

-1--1-2948401-(25480289)-ROLL-20230809.1\_STD MTM

John Smith  
123 Sesame St  
BRONSTON KY 42518

**INTERSTATE GAS SUPPLY, INC.  
AND  
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**Request No. 3**

**Responding Witness: Joseph Olikier**

Request No. 3: Provide the number of years IGS has participated in the CHOICE program, and whether IGS's customer counts have tended to remain steady, increase, or decrease over the years of its participation.

Response No. 3: IGS has participated in the CHOICE program for approximately twenty years. From 2003 to 2008, IGS's customer count increased. Since 2009, IGS's customer count somewhat decreased. In the most recent three years, IGS's customer count has further decreased, largely due to CKY's prohibition against in-person sales.

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**Case No. 2021-00386**

**Request No. 4**

**Responding Witness: Patricia Chang**

Request No. 4: Provide the amount CNG has spent on education efforts directed at Columbia Kentucky's service territory over the last five years.

Response No. 4: CNG has not invested any money in any education efforts directed at Columbia Kentucky's service territory over the last five years.



**INTERSTATE GAS SUPPLY, INC.  
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**Response to the Commission Staff's Post-Hearing Request for Information  
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Dated July 28, 2023**

**Case No. 2021-00386**

**Request No. 5**

**Responding Witness: Patricia Chang**

- Request No. 5: Provide a copy of the renewal letter or the communication which notifies CNG's Columbia Kentucky CHOICE Program customers that their current contract is expiring and the next steps required to receive a new offer from CNG. Include with the response what happens to the customers' gas commodity service if they do not enter into a new contract with specific elections as to price, fixed versus variable pricing, and contract length.
- Response No. 5: Renewal letter attached. As noted in the renewal letter, if the customer does not make an election (to cancel or elect a different product), their contract is automatically renewed at the fixed rate listed in the renewal letter.



**Constellation.**

PO Box 4911  
Houston, TX 77210-4911

## Your Natural Gas Rate Plan Renews Soon



CUSTOMER NAME  
123 STREET ADDRESS  
CITY KY 4XXXX

CKY Account Number#: XXXXXXXXXXXX  
Service Address: 123 SERVICE ADDRESS  
CITY, KY 4XXXX

August 12, 2023

Dear Customer Name,

### Your current natural gas plan renews soon.

Thank you for being a Constellation customer. We wanted to let you know that your current contract will end on 10/25/2023. Constellation is dedicated to delivering a simple renewal option to customers like you.

### Do nothing – A simple solution.

Constellation is proud to **lower your fixed supply rate by xx% off of your current supply rate**. No action is needed to take advantage of this offer. Your new plan will automatically take effect when your current agreement ends. You will receive price protection at your new rate through your 10/25/2024 meter reading.

### Your specific plan includes:

- Peace of mind with a **fixed rate of x.xx \$/MCF** and continuation of current terms and conditions
- Price security for 12 months, no matter how much energy you use; and
- No paperwork to fill out, no phone calls to make.

If you decide not to renew, you must notify us by 9/11/2023 in writing, or call 844-278-2503, weekdays 8 a.m. to 8 p.m. ET, except holidays.

### Or, extend your price protection at a lower rate!

For a limited time only, we're pleased to offer you a **fixed price of x.xx \$/MCF when you renew for 24 months**. To opt into this offer, simply visit [constellation.com/renewal](https://www.constellation.com/renewal) and enter your renewal key, XXXXXXX-XXX, or call 844-278-2503, weekdays 8 a.m. to 8 p.m. ET, except holidays. Act fast! This offer is only valid through 9/11/2023.

### We want to hear about your experience!

Your compliments, suggestions and service questions matter to us. Contact our Customer Care Team to share your ideas.

- Call 844-278-2503 weekdays 8 a.m. to 8 p.m. ET, except holidays.
- Email [home@constellation.com](mailto:home@constellation.com).

Thank you again for choosing Constellation.

Sincerely,

Kevin Klages  
Senior Vice President

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Electricity or Gas Supplier License/Order #: CA 1359, CTA0032; CT 06-07-11, 01-06; DE 00-162; DC GA06-2, EA01-5; GA GM-46; IL 16-0205, 17-0330; IA G-0010; ME 2000-989; MD IR-655, IR-311, IR-500, IR-228, 107-2276; MA GS-030, CS-015; MI U-14867, U-13660; NE NG-0043; NH DM 17-024; NJ GSL-0101, ESL-0016; OH 09-153G, 00-003E; PA A-125095, A-110036; OR ES4, RI 2379(Z1), D-96-6(E); TX 10014, 907305101; VA G-26, G-51, E-11A

TX Licenses HVAC TACLA 00107498R, Electrical TECL 343159, Service Plan TSCP #684, Plumbing #43217

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**Request No. 6**

**Responding Witness: Patricia Chang**

Request No. 6: Provide the number of years CNG has participated in the CHOICE program, and whether CNG's customer counts have tended to remain steady, increase, or decrease over the years of its participation.

Response No. 6: CNG has participated in the CHOICE program in Kentucky for 12 years. CNG assumed MXenergy's book of business due to an acquisition that occurred in 2011. CNG has seen a decline in customer counts over our 12 years in the program.