

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
ELECTRONIC TARIFF FILING OF)
COLUMBIA GAS OF KENTUCKY, INC.) Case No.
TO EXTEND ITS SMALL VOLUME GAS) 2021-00386
TRANSPORTATION SERVICE)

**CONSTELLATION NEW ENERGY GAS DIVISION LLC.'S RESPONSE TO STAFF OF
THE KENTUCKY PUBLIC SERVICE COMMISSION'S POST-HEARING DATA
REQUEST**

October 21, 2022

REQUEST FOR INFORMATION

Post-Hearing DR:

State whether customers enrolled in any of your offerings in the CHOICE program have achieved over-all positive dollar savings in any year compared to Columbia Kentucky's gas cost rate. If so, provide the year and the amount of savings.

Response:

As an initial matter, Constellation states that it offers a variety of variable and fixed-rate, fixed-term plans ranging from 6 to 48 months to CHOICE customers in the Columbia Kentucky service territory. These plans provide customers with pricing certainty during periods of volatility (i.e., periods in which commodity pricing is impacted by extreme weather events; geo-political tensions; supply and demand imbalances; etc.) and are priced based, in part, on Constellation's forward-looking estimate of its cost to provide commodity supply service to the customer. In other words, the risk associated with commodity price fluctuations are assumed by Constellation in its role as a supplier. Given the inherent risk associated with Constellation's long-term fixed-rate commodity offering as well as the uncertainty surrounding the long-term viability of the CHOICE program, Constellation's fixed-rate plans include risk-based pricing inputs that are absent from Columbia Kentucky's variable gas cost rate, which passes all gas purchasing costs through to the consumer in future months.

Constellation does not maintain a record of Columbia Kentucky's Gas Cost Rate in the ordinary course of its business, and thus cannot easily respond to the above request with only one part of the requisite information. Included below is a chart of the various fixed rate products offered by Constellation to CHOICE customers in the Columbia Kentucky service territory since September 2019:

Responses to the Commission Staff's Post-Hearing DR to
Constellation New Energy Gas Division, LLC.
Case No. 2021-00386

October 21, 2022

<u>Month/Year</u>	<u>CEG Rate</u>	<u>Term</u>		<u>Month/Year</u>	<u>CEG Rate</u>	<u>Term</u>
Sep-19	\$4.89	48		Jun-21	\$4.89	36
Oct-19	N/A	N/A			\$5.85	24
Nov-19	N/A	N/A			\$4.79	48
Dec-19	\$4.89	36			\$4.79	27
Jan-20	\$5.04	36		Jul-21	\$4.79	27, 36
Feb-20	\$5.99	36			\$5.85	24
Mar-20	\$4.50	48			\$5.04	36, 48
	\$4.30	48		Aug-21	\$5.85	24
Apr-20	\$4.50	36		Sep-21	\$5.39	24
	\$4.60	36			\$5.85	24
May-20	\$4.60	36			\$5.65	24
	\$4.79	36		Oct-21	\$5.85	24
Jun-20	\$4.60	36			\$5.99	12
Jul-20	N/A	N/A			\$6.19	12
Aug-20	\$4.60	36			\$6.43	36
	\$4.70	36		Nov-21	\$5.99	12
Sep-20	\$4.70	36			\$6.79	12
Oct-20	\$5.65	24			\$6.99	12
	\$5.72	24			\$8.59	12
Nov-20	\$5.72	24			\$7.99	12
Dec-20	\$5.72	24			\$6.43	24
Jan-21	\$5.72	24			\$6.19	12
Feb-21	\$5.99	36,48			\$6.43	24
	\$5.72	24			\$5.29	48
	\$5.85	24,36			\$5.22	48
Mar-21	\$5.85	24			\$6.59	12
	\$4.79	36			\$6.43	24
Apr-21	\$5.85	24		Dec-21	\$6.43	24
	\$4.89	48			\$6.79	12
May-21	\$5.85	24			\$6.99	12
	\$4.89	48		Jan-22	\$7.69	12
	\$4.79	48			\$7.99	12
	\$5.99	36			\$6.43	24
	\$5.52	18			\$6.79	12, 36
					\$5.46	48
					\$5.99	48

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<u>Month/Year</u>	<u>CEG Rate</u>	<u>Term</u>	<u>Month/Year</u>	<u>CEG Rate</u>	<u>Term</u>
Feb-22	\$7.69	12	Jun-22	\$6.99	24
	\$6.43	24		\$7.49	12, 36
	\$7.99	12		\$7.69	6, 12
	\$6.49	12		\$5.99	48
	\$7.49	24	Jul-22	\$6.99	48
Mar-22	\$6.59	24		\$7.49	12
	\$7.49	24		\$7.99	12, 24, 36
	\$7.69	12		\$7.69	12
	\$6.79	12		\$9.79	6
	\$7.99	12		\$8.99	6
	\$5.46	48		\$8.29	12
	\$6.99	12	Aug-22	\$8.59	12
Apr-22	\$5.99	12		\$8.99	6, 12, 24, 36
	\$6.79	12		\$8.29	12
	\$6.99	12		\$7.69	48
	\$6.19	24	Sep-22	\$9.79	6, 12
	\$6.59	24		\$8.99	36
	\$7.39	24			
	\$10.49	24			
	\$6.29	24			
May-22	\$6.79	12			
	\$7.69	6, 12			
	\$6.99	12, 24			
	\$7.49	12			
	\$6.29	24			
	\$5.99	48			
	\$6.19	24			

Person Responsible: Patricia Chang, Senior Regulatory Affairs Manager for Constellation

Respectfully submitted,

HURT, DECKARD & MAY PLLC

/s/Matt Malone
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Counsel for the Petitioner,
INTERSTATE GAS SUPPLY, INC.

And

**CONSTELLATION NEW ENERGY,
GAS DIVISION, LLC**

CERTIFICATE OF SERVICE

I hereby certify that IGS and CNEG's October 21, 2022 electronic filing is a true and accurate copy of IGS and CNEG's pleading and Read 1st Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on October 21, 2022; that an original and one copy of the filing will not be mailed to the Commission given the pandemic orders; that there are currently no parties excused from participation by electronic service; and that, on October 21, 2022, electronic mail notification of the electronic filing is provided to all parties of record.

/s/Matt Malone
Attorney for Interstate Gas Supply, Inc
And Constellation New Energy, Gas Division, LLC

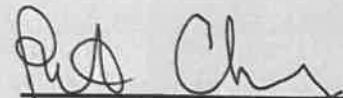
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October 21, 2022

STATE OF FLORIDA)
)
COUNTY OF BROWARD)

VERIFICATION

Patricia Chang, being first duly sworn, on oath deposes 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 the information contained therein is true and correct to the best of her knowledge, information and belief.


PATRICIA CHANG

Senior Regulatory Affairs Manager for CNEG, LLC.

Subscribed and sworn to me
This 21st day of October 2022



