

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:)	
)	
THE ELECTRONIC APPLICATION OF)	
COLUMBIA GAS OF KENTUCKY, INC. FOR)	Case No. 2022-00049
APPROVAL OF THE GREEN PATH RIDER PILOT)	
PROGRAM)	
)	

COLUMBIA GAS OF KENTUCKY, INC.'S
MOTION FOR DEVIATION

Comes now Columbia Gas of Kentucky, Inc. (“Columbia” or “Company”), by counsel, respectfully requests that the Kentucky Public Service Commission (“Commission”) grant a partial deviation from its March 24, 2023 Order¹ (“Order”) to provide seven additional days to comply with the deadline established in that Order.

1. On March 24, 2023, the Commission issued an Order finding that the customer notice provided in the above-captioned case failed to comply with the requirements outlined in 807 KAR 5:011 Section 8(4)(e)-(f).² Columbia’s previous customer notice failed to include statements that the complete filing may be reviewed at the Company and the Commission’s offices. Further, the Commission noted that the notice stated that “the complete text of the tariff appears below,” but that the notice

¹ *In the Matter of the Electronic Application of Columbia Gas of Kentucky, Inc. For Approval of the Green Path Rider Pilot Program*, Case No. 2022-00049, Order (March 24, 2023).

² *Id.* at 3

contained only an abbreviated version of the proposed tariff language.³ The Order required Columbia to provide compliant customer notice within thirty days.

2. In the period between the Order and the filing of this Motion, Columbia prepared updated customer notice consistent with the requirements found in both the Order and 807 KAR 5:011 Section 4. Pursuant to 807 KAR 5:011 Section 8(2)(c), Columbia prepared to effectuate customer notice through a combination of publication and mailing. Columbia mailed notice to a portion of its customer base on April 18, 2023.⁴ The affidavit attesting to this fact is included with this filing as Attachment A.

3. Columbia was informed by the contractor providing customer notice, the Kentucky Press Association, that publication of the customer notice will not be completed for all of the newspapers of general circulation in Columbia's service area until the end of this week. A copy of the notice for publication is attached as Attachment B.

4. Columbia respectfully requests a limited deviation from the Order's requirement that Columbia be "given 30 days from the service date of this Order to provide corrected notice to its customers at least one time."⁵ Specifically, Columbia requests seven additional days, until Monday May 1, 2023, to finalize newspaper notice to its customers.

³ *Id.* at 3-4.

⁴ Similar to previous iterations of customer notice in this case, notice has been provided to 173 customers across ten counties.

⁵ *Supra* Note 1 at 4.

5. Customer notice compliant with the Commission's notice regulations for a segment of Columbia's service area will be delayed for one week. The new compliant notice provides additional information to customers, but certain details of Columbia's application in this case have been included in previously published notice. Further, Columbia has posted notice of the application on its website and the previous iterations of the non-compliant notice directed customers to its website. Because of this, no harm or prejudice will result from the failure to publish customer notice in for all publications within the thirty-day requirement. Good cause exists to grant this Motion in order to allow Columbia to correctly and completely finalize notice of its application in a manner consistent with Commission regulations.

WHEREFORE, on the basis of the foregoing, Columbia respectfully prays the Commission grant the requested deviation for the good cause outlined herein.

This 24th day of April 2023.

Respectfully submitted,

/s/ John R. Ryan _____

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Counsel for Columbia Gas of Kentucky, Inc.

CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing is a true and accurate copy of the document; that the electronic filing was transmitted to the Commission on April 24, 2023; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ John R. Ryan

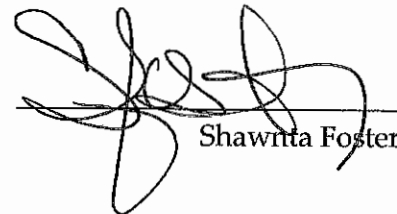
Counsel for Columbia Gas of Kentucky, Inc.

AFFIDAVIT

The affiant, Shawnta Foster, being first duly sworn states the following under oath:

1. I am the Service Delivery Manager for Exela Technologies, serving NiSource Corporate Services.
2. As part of my duties as Service Delivery Manager, I am responsible for the mailing of any necessary notices to customers of Columbia Gas of Kentucky, Inc.
3. The attached Notice to Customer of Columbia Gas of Kentucky, Inc.'s Application in Case No. 2022-00049 was mailed to certain Columbia Gas of Kentucky, Inc. customers on April 18, 2023.
4. The attached Notice to Customer was mailed to all customers in the following counties: Bath, Carter, Clay, Johnson, Lee, Letcher, Lewis, Nicholas, Owsley, and Robertson. A total of 173 customers were mailed the notice.

FURTHER, the affiant sayeth naught.

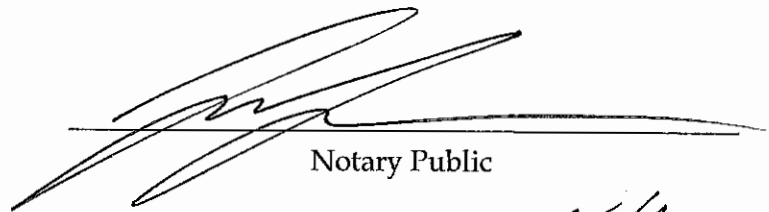

Shawnta Foster

STATE OF OHIO)
)
FRANKLIN COUNTY) ss:

Subscribed, sworn, and acknowledged before me and subscribed in my presence this 20th day of April, 2023.



John R Ryan III
Attorney At Law
Notary Public, State of Ohio
My commission has no expiration date
Sec. 147.03 R.C.


Notary Public

NOTARY COMMISSION NO. : N/A

COMMISSION EXPIRES: N/A

On December 29, 2022 Columbia Gas of Kentucky, Inc. tendered an application with the Kentucky Public Service Commission Case No. 2022-00049. Columbia proposes to adopt a five-year pilot for a **voluntary** program whereby eligible residential and commercial customers may opt-in to a volumetric rate, the collections of which are used to offset the carbon emissions generated by customer usage. The rider will be called the “Green Path” Rider, proposed to be effective after July 1, 2023. The text of the proposed tariff is shown below. Only customers that sign up for this voluntary program will be impacted by the proposed Rider rates. **There is no impact on the existing rates of any customer.** Because it is a new tariff, there is no present rate for this proposed rider. If a customer elects to participate in this voluntary pilot, the estimated bill impact is outlined in the table below:

Customer Type	Average Monthly Usage	Bill Impact – 50% Option	Bill Impact – Net Zero Option
Residential	5.6 Mcf	\$10.02	\$20.03
Commercial	27.3 Mcf	\$48.82	\$97.64

A person may examine this tariff filing at the offices of Columbia Gas of Kentucky, Inc., located at 2001 Mercer Road, Lexington, KY 40511 (800) 432-9345 or its website <https://www.columbiagasky.com/>. A person may examine the tariff filing at the Commission’s offices located at 211 Sower Boulevard, Frankfort, Kentucky 40601, Monday through Friday, 8:00a.m. to 4:30 p.m., or through the Commission’s website at <http://psc.ky.gov>. Comments regarding the application may be submitted to the Public Service Commission through its Web site or by mail to Public Service Commission, Post Office Box 615, Frankfort, Kentucky 40602.

The rates contained in this notice are the rates proposed by Columbia Gas of Kentucky, Inc. but the Commission may order rates to be charged that differ from the proposed rates contained in this notice. Any person may submit a timely written request to intervene to the Commission, 211 Sower Boulevard, P.O. Box 615, Frankfort, Kentucky 40602, establishing the grounds for the request including the status and interest of the party. If the Commission does not receive a request to intervene within thirty (30) days of the initial publication of this notice, the Commission may take final action on the tariff filing.

GREEN PATH RIDER

APPLICABILITY

Applicable to all electing residential sales service customers and commercial sales service customers throughout the entire service territory of Columbia Gas of Kentucky. See Sheet No. 8 for a list of communities.

PURPOSE

The Green Path Rider is a voluntary, volumetric rider available to residential and commercial sales service customers who are focused on their carbon footprint and would like the option to decarbonize some of, or all of, their emissions related to their natural gas consumption. Collections from the Green Path Rider will be used to purchase the environmental attributes of renewable natural gas (“RNG”) and carbon offsets to provide customers a two-tiered option to reduce their emissions by 50% or to 100% (“Net Zero”). The Green Path Rider charge will be updated annually to align with the variable costs associated with the RNG and Carbon Offsets procured as well as the costs associated with implementing the rider.

AVAILABILITY

Available to any customer which receives service under the GS Rate Schedule and meets the following requirements:

- (1) Customer agrees to enroll in the program with the Company for a minimum term of one month.
- (2) Customer is current on their natural gas bill and does not have an outstanding balance,
- (3) Customer selects either the Net Zero Option or the 50% Option by contacting Columbia’s call center

GREEN GAS PROGRAM RATES

Company shall file an annual report with the Commission which shall contain an updated Green Path Rider rate and shall be filed at least ninety (90) days prior to the beginning of each annual period. The Green Path Rider will follow the rider surcharge schedule as set forth below:

Green Path Rider 50% Option	1.7883 per Mcf
Green Path Rider Net Zero Option	3.5766 per Mcf

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