

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

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

**PREPARED DIRECT TESTIMONY OF
JUDY M. COOPER
ON BEHALF OF COLUMBIA GAS OF KENTUCKY, INC.**

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COLUMBIA GAS OF KENTUCKY, INC.

December 29, 2022

1

2 **Q: Please state your name and business address.**

3 A: My name is Judy M. Cooper and my business address is 2001 Mercer Rd.,
4 Lexington, KY 40511.

5

6 **Q: What is your current position and what are your responsibilities?**

7 A: I am the Director of Regulatory Affairs for Columbia Gas of Kentucky, Inc.
8 ("Columbia"). I am responsible for the management of Columbia's
9 regulatory affairs, tariffs and filings with the Kentucky Public Service
10 Commission ("Commission"), including quarterly Gas Cost Adjustments.

11

12 **Q: What is your educational background?**

13 A: I obtained a Bachelor of Science Degree in Accounting from the University
14 of Kentucky in 1982. In 1985, I received a Master's Degree in Business
15 Administration from Xavier University.

16

17 **Q: What is your employment history?**

18 A: I began my employment with the Commission as an auditor in 1982.
19 Subsequently, I served as Rate Analyst, Energy Policy Advisor, Branch
20 Manager of Electric and Gas Rate Design, and Director of Rates, Tariffs

1 and Financial Analysis at the Commission. In July of 1998, I joined
2 Columbia as Manager of Regulatory Services and have remained in
3 regulatory and government roles. My job title currently is Director,
4 Regulatory Affairs.

5

6 **Q: What is the purpose of your testimony in this proceeding?**

7 A: The purpose of my testimony is to explain the mechanics of the proposed
8 Green Path Rider proposed tariff changes as well as the proposed process
9 for updating and reconciling the charges contained therein.

10

11 **Q: Who is eligible to participate in the Green Path Rider?**

12 A: All residential and commercial sales service customers are eligible to
13 participate in the rider. Specifically, customers served under Columbia's
14 General Service Residential ("GSR") and General Service Other ("GSO")
15 rate schedules are eligible. Customers who are currently enrolled in the
16 Customer CHOICE program and served under Rate Schedule Small
17 Volume Gas Transportation Service ("SVGTS"), are not eligible as
18 Columbia is not providing the gas commodity to those customers.

19

20

1 **Q: Why is Columbia proposing a tiered option for this rider?**

2 A: By enabling customers to voluntarily elect to offset their carbon footprint
3 via a tiered option, a larger number of customers will be provided the
4 opportunity to participate at a level with which they are most comfortable.
5 Currently, renewable natural gas (“RNG”) costs more than geologic
6 natural gas. The Green Path Rider enables those customers that wish to
7 support the development of RNG and carbon offsets to do so, but at a
8 level that makes sense for them. By offering two tiers, Columbia can offer
9 two different price points for customers to choose. Those who would like
10 to reduce their emissions but find 100% reduction to be too expensive can
11 choose the lower cost 50% reduction option.

12
13 **Q: What is the difference between the “50% Option” and “Net Zero
14 Option” in the proposed tariff?**

15 A: The difference is the emissions reduction that the customer will achieve.
16 Those who choose the 50% Option will reduce their natural gas related
17 emissions by 50%. Those who choose the Net Zero Option will reduce all
18 their natural gas emissions. The second option lets the customer achieve
19 net zero emissions based on their personal natural gas usage.

20

1 **Q: How will the Green Path Rider appear on participating customers' bills?**

2 A: The Green Path Rider will be shown as a separate line item, so that those
3 customers that volunteer for this program are able to clearly see how their
4 personal gas usage is being offset by the Green Path Rider.

5

6 **Q: How is the Green Path Rider's charge calculated?**

7 A: As detailed in the Direct Testimony of Erich Evans, the rider will recover
8 the costs associated with the RNG environmental attributes and carbon
9 offsets acquired by Columbia from the third-party supplier. In addition,
10 the Green Path Rider charge will recover costs associated with IT
11 programming and consumer education. Each year, Columbia will update
12 the rider to reflect any changes in cost of the program. This will be filed in
13 the form of an annual update for Commission review.

14

15 **Q: Will the Commission review and approve the updated rider charges?**

16 A: Yes. Like any other proposed change in rates, Columbia will file the
17 proposed change in the Green Path Rider charge in advance for the
18 Commission's approval. The proposed tariff is a regulated service, subject
19 to the Commission's jurisdiction, albeit, totally optional to customers.

20

1 **Q: Does the Green Path Rider align with the Commonwealth’s energy**
2 **strategy?**

3 A: As noted in the Direct Testimony of Erich Evans, Columbia’s customers
4 have expressed support for the reduction of their carbon footprint. The
5 Green Path Rider is intended to provide these customers with an avenue
6 to accomplish this. Additionally, on October 20, 2021, Governor Beshear
7 announced the KYE3: Designs for a Resilient Economy strategy. The
8 strategy document accompanying the announcement lists guiding policies
9 applicable to the energy sector. These policies recognize “that economic
10 prosperity is linked” to the availability and sustainability of consumer
11 energy supplies, and support the “commercialization of innovative energy
12 technologies.”¹ The guiding policies further acknowledge that “fuel
13 diversity enhance[s] economic stability.” The Green Path Rider provides
14 an optional mechanism whereby Columbia’s customers can take
15 advantage of diverse fuel options in furtherance of customer preferences
16 or environmental sustainability goals.

17

18 **Q. Does this conclude your Direct Testimony?**

19 A: Yes.

¹ KYE3: Designs for a Resilient Economy, pg. 17.

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)

VERIFICATION OF JUDY COOPER

COMMONWEALTH OF KENTUCKY)
)
 COUNTY OF FAYETTE)

Judy Cooper, Director of Regulatory Affairs of Columbia Gas of Kentucky, Inc., being duly sworn, states that she has supervised the preparation of her Direct Testimony in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

Judy Cooper
 Judy Cooper

The foregoing Verification was signed, acknowledged and sworn to before me this 29th day of December, 2022, by Judy Cooper.

Evelyn Long Durr

Notary Commission No. KYNP49615

Commission expiration: 05/15/2026

