

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

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

**MOTION OF COLUMBIA GAS OF KENTUCKY, INC.
FOR A DECISION ON THE RECORD**

Now comes Columbia Gas of Kentucky, Inc. ("Columbia"), by counsel, and, pursuant to the June 6, 2023 Procedural Order ("Procedural Order"), hereby moves the Kentucky Public Service Commission ("Commission") to decide the above captioned proceeding on the record already established in this case and without the need for a formal hearing. Columbia respectfully states as follows:

On December 29, 2022, Columbia filed an Application requesting authority to create the voluntary Green Path Rider whereby eligible customers may opt-in to a volumetric rate, the collections of which are used to offset the carbon emissions generated by customer usage ("the Application"). Concurrent with the Application, Columbia submitted the testimony of three experts. The Direct Testimony of Judy Cooper describes the mechanics of the tariff changes proposed by Columbia and the process for annual updates to the Green Path Rider rate. The Direct Testimony of Erich Evans describes the

impetus and inputs for the calculation of the Green Path Rider. The Direct Testimony of Andrew Campbell describes Columbia's planned purchase of renewable natural gas ("RNG") environmental attributes and carbon offsets under the proposal. On June 23, 2023, July 25, 2023, and August 15, 2023, Columbia responded to data requests from Commission Staff.

The issue presented to the Commission is whether to authorize Columbia to provide its customers with a new opportunity to offset their carbon footprint through a voluntary program offered by their natural gas distribution utility. The costs to administer this five-year pilot program are proposed to be recovered through the rate charged to customers who volunteer to participate. Columbia believes that the record sufficiently and accurately describes the Green Path Rider. As indicated above, Columbia has submitted substantial information into the record and as a result, a hearing is not needed.

Accordingly, Columbia is willing to waive its right to a hearing, requests that the Commission grant Columbia permission to create the Green Path Rider, and requests that the Commission decide the matter based upon the written record. However, should the Commission or Commission Staff have any remaining questions concerning the application or the relief sought by Columbia, the Company would be willing to participate in a formal hearing and reserves all rights with respect thereto.

Dated this 19th day of September 2023.

Respectfully submitted,

COLUMBIA GAS OF KENTUCKY, INC

/s/ Joseph M. Clark

Joseph M. Clark
Assistant General Counsel

Joseph M. Clark
Assistant General Counsel
John R. Ryan
Senior Counsel
290 W. Nationwide Blvd.
Columbus, Ohio 43215
Telephone: (614) 460-6988
(614) 285-2220
Fax: (959) 288-0258
Email: josephclark@nisource.com
johnryan@nisource.com

L. Allyson Honaker
Brittany H. Koenig
HONAKER LAW OFFICE, PLLC
1795 Alysheba Way, Suite 6202
Lexington, Kentucky 40509
Telephone: (859) 368-8803
allyson@hloky.com
brittany@hloky.com

Attorneys for
COLUMBIA GAS OF KENTUCKY, INC.