COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

)

)

)

)

In the Matter of:

ELECTRONIC REVIEW OF THE PILOT PROGRAM FOR ECONOMIC DEVELOPMENT EXTENSIONS OF SERVICE OF GAS LOCAL DISTRIBUTION COMPANIES

CASE NO. 2022-00403

COMMENTS OF COLUMBIA GAS OF KENTUCKY, INC.

In response to the Commission's Order of December 13, 2022, Columbia Gas of Kentucky, Inc. ("Columbia") offers these comments regarding this proceeding to formally review the EDX Pilot Program to determine if a change in the Pilot Program is warranted. Columbia appreciates this opportunity to provide comments and hopes the Commission will continue to support the Pilot Program and economic development by the utilities subject to its jurisdiction.

The underlying concept to permit gas local distribution companies to have regulatory tools available that encourage capital investments by the utility that enable economic development pursuits and provide the opportunity for economic development advances and subsequent growth is reasonable. The incremental additions to Kentucky's economy from employment and the purchase of goods and services that economic development provides inure to the benefit of all citizens of the Commonwealth of Kentucky, but are typically shouldered by a smaller group of individual utility stakeholders. Generally speaking, it is unreasonable to expect a "onesize fits all" tool could be perfect for all situations. Therefore, the flexibility of the Commission and interested parties to consider a variety of tools, or regulatory mechanisms, is reasonable rather than to rely upon only one single approach for the myriad of interests. Columbia urges the Commission to continue to be flexible and open to the changing environment and needs of utilities and economic development activities.

Columbia has not had an opportunity that fits the requirements of the Pilot Program and therefore does not yet have experience to glean what, if any, specific changes might be offered. However, Columbia is fully supportive of the Pilot Program and hopes that this review and any changes to it would only be improvements to further mutual benefits to all.

In conclusion, Columbia thanks the Commission for the opportunity to comment and to participate in the review of the EDX Pilot Program. This 20th day of January, 2023.

Respectfully submitted,

<u>/s/ John R. Ryan</u> John R. Ryan

Joseph M. Clark Assistant General Counsel John R. Ryan Senior Counsel 290 W. Nationwide Blvd. Columbus, Ohio 43215 (614) 813-8685 (614) 285-2220 josephclark@nisource.com johnryan@nisource.com

Counsel for Columbia Gas of Kentucky, Inc.

CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085, this is to certify that the electronic filing is a true and accurate version of the document that has been transmitted to the Commission on January 20, 2023, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

<u>/s/ John R. Ryan</u>

Counsel for Columbia Gas of Kentucky, Inc.