COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:)
)
ELECTRONIC APPLICATION OF)
COLUMBIA GAS OF KENTUCKY,) Case No. 2024-00074
INC. FOR ANNUAL SAFETY)
MODIFICATION AND)
REPLACEMENT PROGRAM)
BALANCING ADJUSTMENT	

PREPARED DIRECT TESTIMONY OF JEFFERY GORE ON BEHALF OF COLUMBIA GAS OF KENTUCKY, INC.

John R. Ryan Senior Counsel 290 W. Nationwide Blvd. Columbus, Ohio 43215 Telephone: (614) 285-2220 Email: johnryan@nisource.com

Attorney for Applicant **COLUMBIA GAS OF KENTUCKY, INC.**

March 29, 2024

1		I. <u>INTRODUCTION</u>
2	Q.	Please state your name and business address.
3	A.	My name is Jeffery T. Gore and my business address is 290 West Nation-
4		wide Blvd., Columbus, Ohio 43215.
5	Q:	What is your current position and what are your responsibilities?
6	A:	I am a Regulatory Manager for NiSource Corporate Services Company
7		("NCSC"). I am responsible for supporting the NiSource gas utilities in a
8		variety of informational and rate filings, general rate case preparation and
9		support, and other duties as assigned. My primary focus is on matters for
10		Columbia Gas of Kentucky, Inc. ("Columbia" or the "Company") and
11		Columbia Gas of Ohio, Inc.
12	Q:	What is your educational background?
13	A:	I graduated from The Ohio State University with a Bachelor of Science in
14		Business Administration degree, double majoring in Accounting and
15		Computer Science. I have a non-practicing Certified Public Accountant
16		license.
17	Q:	What is your employment history?
18	A:	I have over 30 years work experience with the Columbia Gas Companies
19		primarily within the Accounting and Regulatory departments. Within
20		Accounting, my roles have varied from analyst and manager roles with

1		Columbia distribution companies to Controller - NiSource Service
2		Company & Asset Accounting. Between 2010 and 2015, I was a Regulatory
3		Manager focusing on Columbia Gas of Massachusetts, Columbia Gas of
4		Pennsylvania, and Columbia Gas of Maryland matters. I returned to the
5		Regulatory department in the manager role in October 2018. In early 2021,
6		my responsibilities were changed to include a focus on Columbia.
7	Q:	Have you previously testified before the Kentucky Public Service
8		Commission ("PSC")?
9	A:	Yes. I provided testimony in the following cases:
10		• Written direct testimony in Case No. 2022-00342 in support of
11		Columbia's Safety Modification and Replacement Program
12		("SMRP") annual update,
13		• Written direct and rebuttal testimony in Case No 2021-00183,
14		supporting the requested revenue requirement,
15		• Written direct and rebuttal testimony in Case No. 2002-00145
16		regarding Other Employee Postretirement Benefit matters.
17	Q:	Have you previously testified before any other Utility Commissions?
18	A:	I have provided direct and written testimony before the Massachusetts
19		Department of Public Utilities on multiple occasions supporting the
20		revenue requirement, including the cost of service and rate base, in the base

rate cases, pension expense factor and targeted infrastructure reinvestment
 filings. Additionally, I have provided written testimony supporting the
 revenue requirement and plant in service in base rate cases on behalf of
 Columbia Gas of Ohio, Columbia Gas of Pennsylvania, and Columbia Gas
 of Maryland.

6

II. <u>PURPOSE</u>

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

8 A: My testimony will provide background and support for the annual 9 balancing adjustment ("BA") to the Safety Modification and Replacement 10 Program Rider ("SMRP"). In this case, Columbia is not proposing any 11 changes to the definition or calculation to its formulaic SMRP rate. My 12 testimony is offered to serve as a guide to the filing of this balancing 13 adjustment, the first since Columbia's last base rate case, and to provide 14 background on the Commission's recent adjustments to the SMRP as part 15 of Case No. 2021-00183.

16 Q: What is the proposed balance adjustment?

A: Pursuant to its tariff, Columbia is required to submit an annual balancing
 adjustment by March 31 to true-up actual costs, as offset by operations and
 maintenance expense reductions, during the most recent twelve months
 ended December with the projected SMRP program costs for the same

1		period. The balancing adjustment true-up to the SMRP Rider will become
2		effective with meter readings on and after the first billing cycle of June. The
3		recovery of the 2023 SMRP investments was deficient by \$550,123. The
4		billing rates, as detailed in Form 1.0, Column F, are proposed to commence
5		for twelve months beginning with the June 2024 billing cycle to provide for
6		this under recovery. The proposed tariffs, to be effective with Columbia's
7		first billing cycle of June, on May 30, 2024, are attached to the Application.
8		III. SMRP BALANCING ADJUSTMENT APPLICATION
9	Q:	Will you provide a high-level summary of the format provided in
10		Columbia's Application?
11	A:	Yes. Please refer to the Table of Contents.
11 12	A:	Yes. Please refer to the Table of Contents.Form No. 1.0 provides the calculation of the proposed customer
	A:	
12	A:	• Form No. 1.0 provides the calculation of the proposed customer
12 13	A:	• Form No. 1.0 provides the calculation of the proposed customer billing rates as well as details the existing rates being billed subject
12 13 14	A:	• Form No. 1.0 provides the calculation of the proposed customer billing rates as well as details the existing rates being billed subject to refund from Case No. 2023-00335,
12 13 14 15	A:	 Form No. 1.0 provides the calculation of the proposed customer billing rates as well as details the existing rates being billed subject to refund from Case No. 2023-00335, Form 1.1 provides the billing determinates utilized in the proposed
12 13 14 15 16	A:	 Form No. 1.0 provides the calculation of the proposed customer billing rates as well as details the existing rates being billed subject to refund from Case No. 2023-00335, Form 1.1 provides the billing determinates utilized in the proposed rate calculation,
12 13 14 15 16 17	A:	 Form No. 1.0 provides the calculation of the proposed customer billing rates as well as details the existing rates being billed subject to refund from Case No. 2023-00335, Form 1.1 provides the billing determinates utilized in the proposed rate calculation, Form 1.2 compares the revenue requirement calculated for 2023

1		• Forms 2.0, 2.1 and 2.2 detail the revenue requirement calculation for
2		the 2023 SMRP investments,
3		• Forms 3.0, 4.0 and 5.0 detail the monthly actual Plant in Service,
4		Accumulated Depreciation and Depreciation expense for 2023 SMRP
5		investments,
6		• Forms 6.0 and 6.1 detail the year end ADIT balance as well as
7		normalized monthly balances based on a 13-month average,
8		• Form 7.0 details the property tax expense which is zero in this case
9		as the 2023 investments are not includable in property tax filings
10		until calendar year 2024,
11		• Form 8.0 details the O&M savings included in the revenue which is
12		zero as the actual O&M exceeds the amounts used in determination
13		of base rates.
14	Q:	Please provide a more detailed summary of Forms 1.0 and 1.1.
15	A:	The revenue requirement (Form 1.0, Column C, Line 5) is allocated by Rate
16		Schedule utilizing the overall base revenue distribution as approved in the
17		2021 Rate Case Order (Form 1.0, Column B). The revenue requirement is
18		divided by the estimated billing determinant volumes (Form 1.0, Column
19		D) as detailed in Form 1.1. The Column E billing rates are per Case No.
20		2023-0335. The Balance Adjustment (Column F) is calculated using the

1		information in columns C and D. The Total Volumetric SMRP rider rate in
2		Column G is the sum of the Column E and F billing rates.
3	Q:	Please provide a more detailed summary of Forms 2.0, 2.1 and 2.2.
4	A:	Form 2.0, Column A reflects the 13-month average balances for 2023 Plant
5		in Service, Accumulated Depreciation, and ADIT as well as associated 2023
6		expenses for SMRP related investments placed in service. Column B
7		summarizes the Net Rate Base and expenses and calculates the revenue
8		requirement utilizing the rate of return (Form 2.1) and the PSC Assessment
9		Factor (Form 2.2).
10	Q:	Please provide a more detailed summary of Form 3.0.
11	A:	Form 3.0 details the 2023 SMRP additions and retirements by month in the
12		Plant in Service account. The calculated 13-month average balance of Plant
13		in Service is detailed in the right most column.
14	Q:	Please provide a more detailed summary of Form 4.0.
15	A:	Form 4.0 details the 2023 SMRP depreciation expense, retirements, and cost
16		of removal in the Accumulated Reserve by month. The depreciation
17		expense is calculated in Form 5.0. The retirements are aligned with the
18		retirements as included in Form 3.0. The calculated 13-month average
19		balance of Accumulated Depreciation is detailed in the right most column.
20		

Q: Please provide a more detailed summary of Form 5.0.

A: Form 5.0 details the 2023 SMRP depreciation expense calculation. The
monthly additions and retirements by Gas Plant Account are based on the
data in Form 3.0. The depreciation rates are based on the rates approved in
the 2021 Rate Case Order.

6 Q: Please provide a more detailed summary of Forms 6.0 and 6.1.

- A: Form 6.1 details the calculated ADIT balances for calendar year 2023. Pages
 2 and 3 separate the ADIT calculation for investments in mains and services
 from other investments. Mains and services ADIT includes a tax repairs
 deduction not applicable to the remaining investments. Page 1 summarizes
 Pages 2 and 3 and detail the total year-end 2023 ADIT balances.
- 12 Form 6.0 normalizes the year-end ADIT balance to generate a monthly
- 13 ADIT balance utilized to calculate the 13-month average balance.
- 14 Q: Please provide a more detailed summary of Form 7.0.

A: Form 7.0 details the property tax expense for 2023. The net investment at
the end of the prior year is multiplied by the property tax rates as developed
in the 2021 Rate Case to determine the expense. As this balancing
adjustment includes 2023 investments only, the prior year balance is zero
resulting in zero property tax expense included in the revenue requirement.

O:

Please provide a more detailed summary of Form 8.0.

A: Form 8.0 details the Operation and Maintenance savings that could be included as a reduction in the revenue requirement. The 2023 actual expense in Account 887 is compared to the amounts being recovered in base rates to determine if the company actual expense reflects a savings. In this instance, the 2023 incurred costs exceed the amounts recovered in base rates, therefore the projected O&M savings adjustment is zero.

8

IV. <u>SMRP VOLUMETIRC RATE BILLINGS</u>

9 Q: What recent Commission-ordered changes to the SMRP are reflected in
10 this case?

11 A: Per the Order in the 2021 Columbia base rate case (Case No. 2021-00183),

12 Columbia was directed to establish a volumetric charge for its SMRP rider.

Prior to this order, Columbia utilized a fixed rate per meter per billing
period in the SMRP rider for customer billing. Therefore, the Application
filed in this case includes the first balancing adjustment that includes
volumetric rates as part of the reconciled year.

17 Q: What are impacts to customers resulting from the change from fixed rate
18 to volumetric rates?

A. A volumetric charge creates higher bills in the colder months whencustomer usage is higher. Thus, the SMRP component of the customer bill

1 is compounding the total customer bill during the heating season when 2 volumetric base rate and gas costs components are at their highest on the 3 customer bill. Columbia's previous design of fixed rates per meter 4 equalized the SMRP component of the customer bill throughout the year and provided for a more levelized impact on the customer bill. 5 6 Further, the use of volumetric rates creates the potential for larger balancing 7 adjustments than would have been experienced when utilizing fixed rates. 8 The Columbia customer base is stable with minimal net growth year over 9 year. As a result, actual fixed SMRP billing amounts are expected to be close 10 to the projected amounts. Customer throughput can be impacted by 11 weather and customer usage habits, as well as customer counts, but 12 weather and customer usage are least predictable. Therefore, a volume-13 based rate has the potential to provide for a larger variance when 14 comparing actual customer billed amounts to the projected customer bill 15 amounts.

17

Q:

16

in this balancing adjustment?

A: The balancing adjustment, which reflects an under recovery of \$550,123,
includes \$183,887 under-recovery related to the difference between the
amount collected and the planned billing amounts. Refer to SMRP Form

What is the impact of 2023 expected and actual customer billings included

1		1.2, Lines 16 to 24 which separate the balancing adjustment into two
2		components:
3		• \$366,236 (Line 19) reflecting the difference in actual and planned
4		revenue requirement, and
5		• \$183,887 (Line 23) reflecting the difference in expected and actual
6		customer billings.
7		V. <u>SMRP BA FILING PROCESS</u>
8	Q:	What process was used in the preparation of this BA filing?
9	A:	The 2023 SMRP Plant additions, retirements and cost of removal plant
10		activity were identified within the activity for five potential Gas Plant
11		Accounts (Mains – 376, Plant Regulators – 378, Service Lines - 380, Meter
12		Installations - 382, and House Regulators - 383). Additionally, the various
13		projects/work orders were reviewed at the beginning of this year to ensure
14		they were compliant with SMRP eligibility requirements. Some of the
15		projects initially thought to be includable were determined to not be eligible
16		and have been removed from this filing. After completion of this review
17		process, the 2023 SMRP plant additions total \$43.9 million.
18		

1	Q:	How do the actual \$43.9 million plant additions compare to the projected
2		plant additions included in the original 2023 SMRP filing (Case No. 2022-
3		00342)?
4	A:	The total actual plant additions are \$2.3 million higher than the originally
5		projected additions of \$41.6 million.
6	Q:	What contributes to the \$2.3 million difference in actual versus projected
7		plant additions?
8	A:	A major contributor relates to the 2023 SMRP project list included in
9		Columbia's October 14, 2022, Annual SMRP filing in CN 2022-00342 ¹ . A
10		copy of the 2023 proposed project list is provided as Attachment JTG-1 to
11		my testimony. The last line on Page 2 of the project list titled, "Leakage
12		Repairs requiring main Replacement" identified \$2,000,000 as projected
13		costs. This amount was not carried into the "Total" column and were
14		therefore not included in the total projected \$41,642,524 additions.
15	Q:	How different would the initial revenue requirement have been if the
16		\$2.0 million had been added to the plant additions?
17	A:	The projected revenue requirement would have been \$1,643,844 or \$70,544
18		higher than the original filing.
19		

¹ Case No. 2022-00342, Attachment JMC-1 "Proposed 2023 SMRP Project List,"

1	Q:	Have you changed any other data inputs beyond the Plant activity?
2	A:	Yes. There are two notable changes included in the BA filing as follows:
3		• The 2023 tax repairs percentage utilized on Form 6.1 Page 2 was
4		updated to 36.28% to reflect the 2023 actual rate,
5		• The 2023 O&M costs in Form 8.0 are included in the calculation of
6		O&M savings to include in the revenue requirement.
7	Q:	Does this conclude your Direct Testimony?
8	A:	Yes.

				Tvpe	Size(s)		Stations		Total	Estimated	Estimated		Service	Proposed		
				2	to	Install		Proposed Material	Replacement	Start	Completion	Main	Line	Blanket		
Project Name and Job Order	Project ID	Location (Streets)	City	Install	Install	Footage	Retire	to be Removed	Services	Month	Month	Estimate	Estimate	Estimate	Total	Specific Safety Issue Addressed
Berry Lane SMRP 22-0261621-00	22-86046	Berry Ln, Providence Rd, Kastle Rd, and Eldermere Rd.	Lexington	Plastic Medium Density	2" & 4"	8150	1	4543' bare steel 69' plastic	93	April	November	\$950,000	\$548,700		\$1,498,700 Re	\$1,498,700 Replace bare steel and vault regulator station.
Walton Ave SMRP 22-0261588-00	22-85539	Walton Ave, and Aurora Ave.	Lexington	Plastic Medium Density	4" & 8"	540	0	542' bare steel 53' coated steel	12	May	June	\$262,000	\$70,800		\$332,800 Re	\$332,800 Replace bare steel coupled pipe.
Parkway Drive SMRP 22-0261632-00	22-86252		Lexington	Plastic Medium Density	2"	775	0	796' bare steel	9	June	ylut	\$81,000	\$35,400		\$116,400 Re	\$116,400 Replace bare steel pipe.
Cherokee Park SMPR 22-0261655-00	22-86440	Cherokee Park, Arcadia Park, and Nicholasville Rd.	Lexington	Plastic Medium Density	2"	3900	0	2715' bare steel 425' of plastic	41	May	September	\$550,000	\$241,900		\$791,900 Re	\$791,900 Replace bare steel pipe.
Scott Ave IP SMRP 22-0261640-00	22-86363	ey St., s St., Bell	Paris	Plastic Medium Density	2"	5105	1	4293' bare steel 1228' coated steel 1190' plastic	68	March	August	\$1,020,000	\$401,200		Re pi \$1,421,200 sti	Replace bare steel pipe, bare steel rail road parallel piping, non-standard diameter piping, and regulator \$1,421,200 station.
Ann Street SMRP 20-0269746-00	20-74544	W. Main gton St., I., Watson		Plastic Medium Density	"4	6860	0	3700' bare steel 1426' Plastic 2271 coated steel 16' unknown	123	March	November	\$1,800,000	\$725,700		\$2,525,700 Re	\$2,525,700 Replace bare steel pipe.
Westwood Dr LP phase 2 22-0261723-00	22-86985	~	Ashland	Plastic Medium Density	2"	4359	2	2520' bare steel 1378' plastic 636' mixed	83	April	September	\$610,000	\$489,700		\$1,099,700 re	Replace bare steel and eliminate two LP 51,099,700 regulator stations.
Payne Ave SMRP 22-0261686-00	22-86608	Payne Ave, Eastwood Dr., Oak St., Fordland Dr., Chestnut St., Walnut St., Hamiton St., Young St., Popular St., Eim St., Locust St., Maple St.,	Georgetown	Plastic Medium Density	2"	13800	0	10934' bare steel 810' plastic 583' plastic	235	February	November	\$1,750,000	\$1,386,500		\$3,136,500 Re	53,136,500 Replace bare steel pipe.
Jefferson St SMRP 22-0261672-00	22-86524	Jefferson St.	Lexington	Plastic Medium Density	4"	720	0	720' bare steel	13	June	ylut	\$310,000	\$76,700		\$386,700 Re	\$386,700 Replace bare steel pipe.
Bob O Link SMRP 22-0261635-00	22-86296	Bob-o-Link Dr., St. Joseph Dr., Mockingbird Ln., Man-o-War Pl., Hummingbird Ln., Jacana Ln., Heron Ln.,	Lexington	Plastic Medium Density	2" & 4"	17,250	1	8805' bare steel 823' coated steel 2124' plastic	238	February	December	\$1,780,000	\$1,404,200		Re \$3,184,200 re	Replace bare steel and eliminate vault regulator station.
Richmond Road BS Replacement 22-0261669-00	22-86441	Richmond Rd.	Lexington	Plastic Medium Density	6" & 8"	2,010	0	2260' bare steel 955' coated steel	6	May	ylul	\$345,000	\$53,100		Re \$398,100 tw	Replace bare steel and prepare to eliminate \$398,100 two vault regulator stations with a future project.
Panola St SIMRP 19-0269130-00	19-68534	Panola St., 26th St.	Catlettsburg	Plastic Medium Density	2"	730	0	568' bare steel 100' plastic 2' unknown 466' coated steel	11	Ąnr	August	\$220,000	\$64,900		\$284,900 Re	5284,900 Replace bare steel pipe.
Riggles St SMRP 20-0269835-00	20-75305	Riggles St., Epperson St.	Ashland	Plastic Medium Density	2"	1670	0	475' bare steel 1200' plastic 3' coated steel 1' unknown	17	June	ylut	\$367,000	\$100,300		\$467,300 Re	\$467,300 Replace bare steel pipe.
Spring St SMRP 22-0261642-00	22-86366		Mt. Sterling	Plastic Medium Density	2"	2300	0	3524' bare steel 50' coated steel	38	April	Мау	\$432,000	\$224,200		\$656,200 Re	\$656,200 Replace parallell main, bare steel pipe.
Addison Ave SMRP 21-0261521-00	20-75431	In right-of-way off Addison Ave	Lexington	Coated Steel High Pressure	8"	535	0	460' bare steel 2' coated steel	0	ylut	August	\$155,000	0\$		Re \$155,000 pr	Replace non-standard diameter bare steel high \$155,000 pressure pipe.
Maple Road 22-0261716-00	22-86936	Maple Pky., Oak St., Sphar Rd., Mason Lewis Rd.	Maysville	Plastic Medium Density	2" & 4"	4196	0	2110' bare steel 1935' coated steel 219' plastic	49	March	June	\$550,000	\$289,100		\$839,100 Re	\$839,100 Replace bare steel pipe.
Lexington Pike Phase 2 22-0261718-00	22-86937	t Rd., Smokey	Maysville	Plastic Medium Density	2" & 3"	3178	1	2935' bare steel 203' coated steel 30' plastic	16	June	October	\$665,000	\$94,400		\$759,400 Re	5759,400 Replace bare steel pipe and retire regulator station.
Holt Ave SMRP 22-0261706-00	22-86853	0	Mt. Sterling	Plastic Medium Density	2"	7200	1	7276' bare steel 1958' coated steel 72' plastic	149	March	November	\$1,440,000	\$879,100		\$2,319,100 Re	\$2,319,100 Replace bare steel and retire regulator station.
Ashland Terrace SMRP 22-0261711-00	22-86912	Ashland Terrace, S. Ashland Ave., Hollywood Dr., Sunset Dr., Chevy Chase Pl.	Lexington	Plastic Medium Density	2" & 4"	2715	1	1020' bare steel 962 coated steel 321' plastic	55	May	September	\$855,000	\$324,500		\$1,179,500 Re	\$1,179,500 Replace bare steel pipe and retire regulator station.
Burns Ave SMRP 22-0261585-00	21-82509	Burns Ave., Belmont Ave., Bristol PI., Western Ave., Hood Ave., Short St., Southern Ct., Stafford Glen, Southern Ct, Boone Ave., Northern Ave.	Winchester	Plastic Medium Density	2" & 4"	8623	1	4219' bare steel 630' plastic 2318 coated steel	79	February	December	\$2,156,000	\$466,100		\$2,622,100 Re	52.622.100 Replace bare steel pipe and retire regulator station.

KY PSC Case No. 2024-00074 Attachment JTG-1 Page 1 of 2

			F	Tvpe	Size(s)		Stations		Total	Estimated	Estimated		Service	Proposed		
											:					
				to	to	Install	\$	Proposed Material	Replacement	Start	Completion	Main	Line	Blanket		
Project Name and Job Order	Project ID	Location (Streets)	City	Install	Install	Footage	Retire	to be Removed	Services	Month	Month	Estimate	Estimate	Estimate	Total	Specific Safety Issue Addressed
		Alternant De Canitel Hainhte														
		Audition Dr., Capital Heignis, Owelay Ava Shaby St														
	_	Owsiey Ave., alleluy al.,														
		Commonwealth Blvd., Tanglewood						7550' bare steel								
SMRP - Tanglewood Dr	_	Dr., Hay Ave., Dakota Rd., Cresent						550' coated steel								
21-0261155-00	21-79094	Ave., Valley Vista Rd., Fran	Frankfort	Plastic Medium Density	2"	9100	1	800' plastic	103	April	September	\$1,660,000	\$607,700		\$2,267,700 Repla	\$2,267,700 Replace bare steel pipe and one regulator station.
E New Circle SMRP								1840' bare steel								
	21-83195	New Circle Road Lexi	Lexington	Plastic Medium Density	4"	1890	0	360' plastic	15	June	August	\$835,000	\$88,500		\$923,500 Repla	\$923,500 Replace bare steel pipe.
		Harrison St. McGuire St, 6th														
	-	Street, Barber Rd., Sanders Rd.,						2520' bare steel								
	-	Long St., Pollard Rd., Ferry St.,						4537' 1st Generation								
Harrison Street AMRP	_	Craft St., Jenkins St., Cedar St.,						plastic								
20-0269781-00	20-74850	-	Ashland	Plastic Medium Density	2"	8620	0	460' plastic	87	March	October	\$1,430,000	\$513,300		\$1,943,300 Repla	\$1,943,300 Replace bare steel pipe.
	_	Brooks Dr., Valentine Dr., Bissotti														
		Dr., Baldwin Ave., Waller Ave.,						2914' bare steel								
	_	Boone Ave., Lewis St., Fairway Ln.,						5685' pre-1965								
SMRP - Circle Dr., Maysville	_	Circle Dr., Wadsworth St., Miller						coated steel								
21-0261270-00	21-80423	Ave. May	Maysville	Plastic Medium Density	2" & 4"	8321	0	157' plastic	106	March	December	\$1,250,000	\$625,400		\$1,875,400 Repla	\$1,875,400 Replace bare steel pipe.
2022 Carry Over Projects	-	INM	Multiple							January	March	\$4,000,000	\$408,124		\$4,408,124 Comp	\$4,408,124 Complete bare steel projects not finished in 2022.
579 - Blanket Replacement Meter									<u> </u>							
Install										January	December			\$131,000	\$131,000	
581 - Blanket House Regulator										-						
Replacement	-									January	December			\$19,000	\$19,000	
565 Scattered Services										January	December			\$5,900,000	\$5,900,000 Repla	\$5,900,000 Replace leaking and bare steel pipe.
Leakage Repairs requiring main																
Replacement										January	December	\$2,000,000			Repla	Replace leaking and bare steel pipe.
		Tot	Totals for 2023			122547	10	0	1646			\$27,473,000	\$27,473,000 \$10,119,524		\$41,642,524	

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF COLUMBIA GAS OF KENTUCKY, INC. FOR ANNUAL SAFETY) MODIFICATION AND REPLACEMENT PROGRAM BALANCING ADJUSTMENT

Case No. 2024-00074

VERIFICATION OF JEFFERY GORE

)

STATE OF OHIO

COUNTY OF FRANKLIN

Jeffery Gore, Regulatory Manager for NiSource Corporate Services Company, on behalf of Columbia Gas of Kentucky, Inc., being duly sworn, states that he has supervised the preparation of testimony in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

The foregoing Verification was signed, acknowledged and sworn to before me this 26 day of March, 2024, by Jeffery Gore.



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

Notary Commission No.

Commission expiration: