

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

In the matter of:

THE ELECTRONIC APPLICATION OF	)	
COLUMBIA GAS OF KENTUCKY, INC.	)	CASE NO.
FOR AN ADJUSTMENT OF RATES;	)	2024-00092
APPROVAL OF DEPRECIATION STUDY;	)	
APPROVAL OF TARIFF REVISIONS; AND	)	
OTHER RELIEF	)	

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**COLUMBIA GAS OF KENTUCKY, INC.'S VERIFIED RESPONSE TO  
INTERSTATE GAS SUPPLY AND CONSTELLATION NEW ENERGY'S  
FIRST REQUEST FOR INFORMATION ENTERED JUNE 21, 2024**

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Comes now Columbia Gas of Kentucky, Inc.'s ("Columbia"), by counsel, and does hereby tender its Verified Response to Interstate Gas Supply and Constellation New Energy's First Request for Information entered June 21, 2024

Entered July 10, 2024

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: )
)
ELECTRONIC APPLICATION OF COLUMBIA GAS )
OF KENTUCKY, INC. FOR AN ADJUSTMENT OF )
RATES; APPROVAL OF DEPRECIATION STUDY; )
APPROVAL OF TARIFF REVISIONS; AND OTHER )
RELIEF )

Case No. 2024-00092

VERIFICATION OF TAMALEH SHAEFFER

STATE OF OHIO )
)
COUNTY OF FRANKLIN )

Tamaleh Shaeffer, Rate Case Execution Manager for NiSource Corporate Services Company, being duly sworn, states that she has supervised the preparation of responses to discovery 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.

Tamaleh L. Shaeffer
Tamaleh Shaeffer

The foregoing Verification was signed, acknowledged and sworn to before me this 2nd day of July, 2024, by Tamaleh Shaeffer.

Notary Commission No. N/A
Commission expiration: N/A



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

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC APPLICATION OF COLUMBIA GAS )
OF KENTUCKY, INC. FOR AN ADJUSTMENT OF )
RATES; APPROVAL OF DEPRECIATION STUDY; )
APPROVAL OF TARIFF REVISIONS; AND OTHER )
RELIEF )

Case No. 2024-00092

VERIFICATION OF JULIE C. WOZNIAK

STATE OF OHIO )
)
COUNTY OF FRANKLIN )

Julie C. Wozniak, Manager of Regulatory Studies for NiSource Corporate Service Company, a management and services subsidiary of NiSource Inc. for Columbia Gas of Kentucky, Inc., being duly sworn, states that she has supervised the preparation of responses to discovery 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.

Julie C. Wozniak
Julie C. Wozniak

The foregoing Verification was signed, acknowledged and sworn to before me this 2nd day of July, 2024, by Julie C. Wozniak.

[Signature]

Notary Commission No. N/A

Commission expiration: N/A



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

KY PSC Case No. 2024-00092  
Response to the IGS/Constellation's Data Request Set One No. 1  
Respondent: Julie Wozniak

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO INTERSTATE GAS SUPPLY, INC.'S ("IGS") AND  
CONSTELLATION NEW ENERGY- GAS DIVISION, LLC'S ("CNEG")'S  
FIRST REQUEST FOR INFORMATION  
DATED JUNE 21, 2024**

For the last two (2) years on an annual basis please identify and provide the total revenue amounts collected from all customer distribution rates.

**Response:**

Total billed revenue excluding gas cost was \$109,316,765.92 for calendar year 2022 and \$115,628,048.51 for calendar year 2023.

KY PSC Case No. 2024-00092  
Response to the IGS/Constellation's Data Request Set One No. 2  
Respondent: Julie Wozniak

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO INTERSTATE GAS SUPPLY, INC.'S ("IGS") AND  
CONSTELLATION NEW ENERGY- GAS DIVISION, LLC'S ("CNEG")'S  
FIRST REQUEST FOR INFORMATION  
DATED JUNE 21, 2024**

For the last two (2) years on an annual basis please identify and provide the total commodity and capacity revenue collected solely from default (non-Choice) service customers.

**Response:**

Total commodity and capacity revenue collected from default (non-Choice) service customers was \$89,248,248.69 for calendar year 2022 and \$77,079,223.58 for calendar year 2023.

KY PSC Case No. 2024-00092  
Response to the IGS/Constellation's Data Request Set One No. 3  
Respondent: Tamaleh Shaeffer

**COLUMBIA GAS OF KENTUCKY, INC.  
RESPONSE TO INTERSTATE GAS SUPPLY, INC.'S ("IGS") AND  
CONSTELLATION NEW ENERGY- GAS DIVISION, LLC'S ("CNEG")'S  
FIRST REQUEST FOR INFORMATION  
DATED JUNE 21, 2024**

For the last two (2) years on an annual basis please identify and provide the total uncollectible amounts arising from the default (non-Choice) service customers. Please break out this amount for distribution rates and default service rates.

**Response:**

Uncollectible charge-off reporting is maintained in Columbia's billing system on a rolling twelve-months-ended. The information currently available is for the period twelve-months-ended June 2024. The sales service customers charge-offs for this period are \$1,571,193. Columbia's billing system does not distinguish charge-offs for gas cost vs. base rates for sales service customers.