

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)	

JOINT MOTION TO EXCUSE WITNESSES FROM HEARING AND REQUEST FOR EXPEDITED TREATMENT

Comes now Columbia Gas of Kentucky, Inc. (“Columbia”); the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“AG”); Kentucky Industrial Utility Customers (“KIUC”); and Interstate Gas Supply, Inc. and Constellation New Energy – Gas Division, LLC (“Suppliers”) (collectively “Joint Movants”), by and through undersigned counsel, pursuant to the applicable rules and regulations of the Kentucky Public Service Commission (“Commission”), and requests that the Commission excuse the below-listed witnesses from participating in the evidentiary hearing who have sponsored testimony, schedules, or responses to data requests filed in this case, except for Judy M. Cooper, who will be filing testimony in support of a Joint Stipulation and Settlement Agreement (“Stipulation”) that will be filed later today as well as Suppliers Witness Matthew White. Finally, Joint Movants request

that the Commission issue an order responding to this Motion on or before October 17, 2024. As grounds for this motion Joint Movants respectfully state as follows:

1. Columbia filed its Application in this proceeding on May 16, 2024. After deficiencies were cured the Application was deemed filed by the Commission on May 23, 2024.

2. The AG was granted intervention on June 5, 2024.

3. KIUC was granted intervention on June 14, 2024.

4. Suppliers were granted intervention on June 28, 2024.

5. The parties participated in multiple rounds of discovery and provided written testimony in the record of the proceeding.

6. A Stipulation will be filed into the record of this proceeding, along with testimony of Judy M. Cooper in support of the Stipulation. The Stipulation resolves all of the base rate issues in this proceeding.

7. Joint Movants believe that the written discovery in this proceeding has created a robust record. Joint Movants request the Commission limit the necessary appearance of witnesses at the evidentiary hearing currently scheduled the week of October 21, 2024 to Witnesses Judy M. Cooper and Matthew White. Excusal of witnesses would allow Columbia, the AG, and KIUC to avoid the costs associated with witnesses traveling to the Commission to participate in the hearing. Because Columbia's costs to participate in the hearing are recovered through rate case expense, granting this motion

reduces actual rate case costs that are eventually added to customer bills. Finally, if the Commission grants this motion, Joint Movants agree to waive their respective rights to cross examination of all the below-listed witnesses.

8. Specifically, Joint Movants request the excusal of the following witnesses:

Columbia Witnesses
Kimra H. Cole
Jeffery T. Gore
Don Ayers
John J. Spanos
Vincent V. Rea
Gregory Skinner
Ronald J. Amen/Gregory Macias (see Columbia's September 24, 2024 Notice of Substitution of Witnesses)
Kevin L. Johnson
Michael E. Girata
Julie C. Wozniak
Tamaleh L. Shaeffer
Criag Inscho
Chrisley Scott

Nicholas R. Bly
Kristen King (see Columbia's September 24, 2024 Notice of Substitution of Witnesses)
Jennifer Harding
Elizabeth Owens
David A. Roy
The Office of the Attorney General of the Commonwealth of Kentucky
John Defever
Richard A. Baudino
Kentucky Industrial Utility Customers
Kevin Murray

9. The Stipulation that will be tendered, was negotiated in good faith, is not a black box settlement, resolves all issues related to the base rate proceeding and is a fair compromise between the parties.

10. Finally, Joint Movants request expedited treatment of its review of this Motion. All of Joint Movants' witnesses have established travel plans to attend and participate in the evidentiary hearing scheduled to begin on October 21, 2024. Some of the flights, vehicle rentals, and hotel accommodations require as much as three-days'

notice to cancel reservations without incurring a penalty. In order to reduce any unnecessary cancellation fees, Joint Movants respectfully request that the Commission address this Motion on or before October 17, 2024 to provide sufficient time to adjust travel plans.

Wherefore, on the basis of the foregoing, Joint Movants respectfully move to excuse all of their witnesses, except for Columbia Witness Judy M. Cooper and Suppliers Witness Matthew White, from the evidentiary hearing. Joint Movants also respectfully request that the Commission issue an order responsive to this Motion prior to October 17, 2024.

This the 14th day of October 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission for filing on October 14, 2024; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; by virtue of the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be made.

/s/ John R. Ryan _____
Counsel for Columbia Gas of Kentucky, Inc.