

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

In the matter of: : CASE NO. 2024-00092

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

**INTERSTATE GAS SUPPLY, INC.’S (“IGS”) AND CONSTELLATION NEW ENERGY-
GAS DIVISION, LLC’S (“CNEG”)
SUPPLEMENTAL REQUEST OF INFORMATION TO
COLUMBIA GAS OF KENTUCKY, INC.**

Come Interstate Gas Supply, Inc. (“IGS”) and Constellation New Energy – Gas Division, LLC (“CNEG”), interveners in this action, and respectfully request the applicant, Columbia Gas of Kentucky, Inc. (the “Company”), to respond to the Supplemental Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

- A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.
- B. Restate the information inquiry immediately preceding each response.
- C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit IGS/CNEG to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means the Company or the witness, as the context requires.
2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the Company or its officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.

3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

SUPPLEMENTAL REQUEST FOR INFORMATION OF IGS/CNEG

Q. 2-1. For the last two (2) years on an annual basis please identify and provide the total amount of revenue invoiced to Choice customers on behalf of retail natural gas suppliers.

Q. 2-2. For the last two (2) years on an annual basis please identify and provide the total amount of revenue (distribution and commodity) collected from Choice customers.

Q. 2-3. For the last two (2) years on an annual basis please identify and provide the total uncollectible amounts arising from Choice customers.

Q. 2-4. For the last two (2) years on an annual basis, identify Columbia Gas of Kentucky's administrative and labor expenses associated with customer collections for outstanding receivables. Specifically identify the amount proposed for recovery in base rates in this proceeding.

Q. 2-5. In response to IGS's/CNG's First Set No. 3, Columbia Gas of Kentucky indicated with respect to uncollectible expenses that "The sales service customers charge-offs for this

period are \$1,571,193.” Regarding this response, identify where the amount was collected, i.e., through distribution rates or from sales customers through bypassable commodity rates.

Q. 2-6. Identify whether Columbia Gas of Kentucky is proposing to allocate any portion of its uncollectible expenses exclusively to sales service customers. If the answer is yes, identify the amount.

Respectfully submitted,

/s/Matt Malone

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and Constellation New Energy, Gas Division, LLC

CERTIFICATE OF SERVICE

I hereby certify that IGS and CNEG’s July 24, 2024 electronic filing is a true and accurate copy of IGS and CNEG’s pleading and Read 1st Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on July 24, 2024; that an original and one copy of the filing will not be mailed postage prepaid to the Commission due to pandemic rules; that there are currently no parties excused from participation by electronic service; and that, on July 24, 2024, electronic mail notification of the electronic filing is provided to all parties of record.

/s/Matt Malone

Attorney for Interstate Gas Supply, Inc.

and Constellation New Energy, Gas Division, LLC