

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;	)	2026-00099
APPROVAL OF DEPRECIATION STUDY;	)	
APPROVAL OF TARIFF REVISIONS; AND	)	
OTHER RELIEF	)	

COLUMBIA GAS OF KENTUCKY, INC.'S VERIFIED RESPONSES
TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Comes now Columbia Gas of Kentucky, Inc. ("Columbia" or "Company"), by
counsel, and does hereby tender its Verified Responses to Commission Staff's Third Request
for Information entered July 17, 2026.

Filed: August 4, 2026

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

In the Matter of:

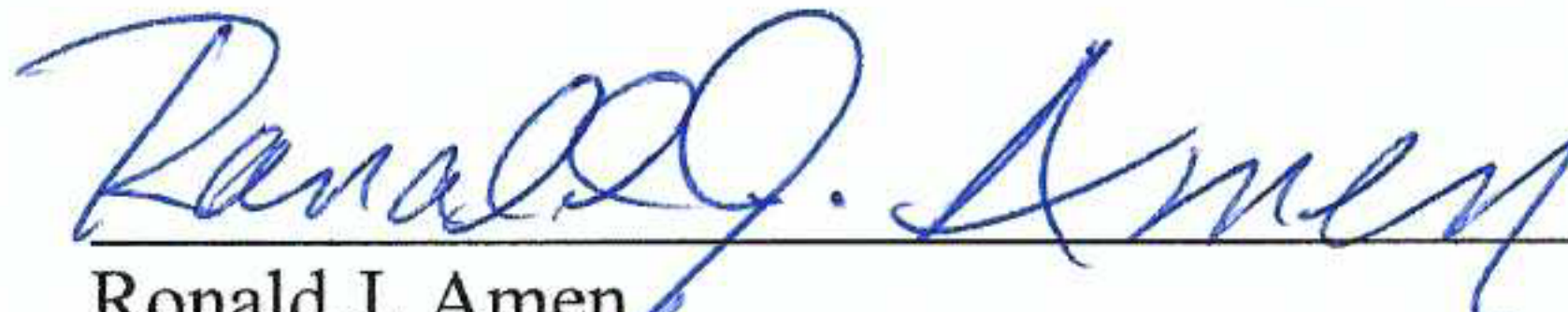
ELECTRONIC APPLICATION OF)
COLUMBIA GAS OF KENTUCKY, INC.) Case No. 2026-00099
FOR AN ADJUSTMENT OF RATES;)
APPROVAL OF DEPRECIATION STUDY;)
APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF RONALD J. AMEN

STATE OF WASHINGTON)

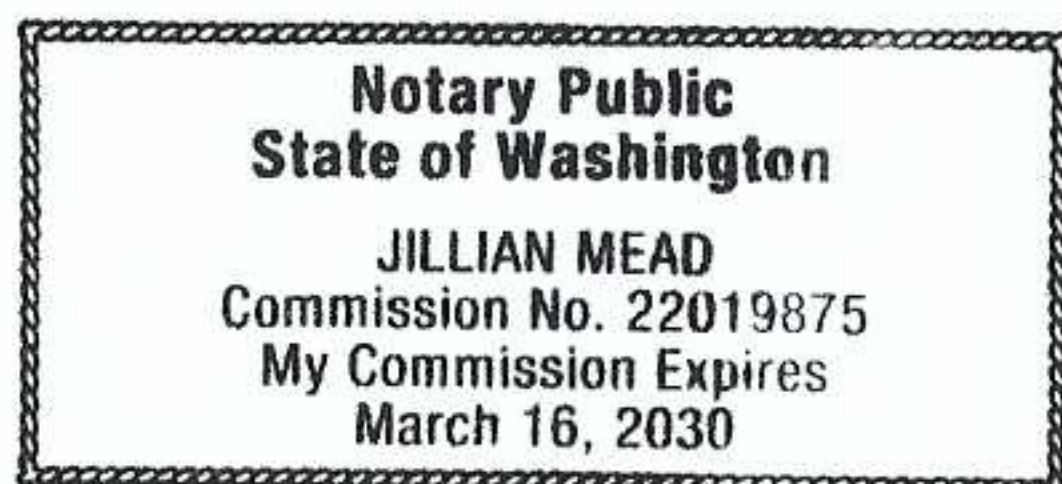
COUNTY OF KING)

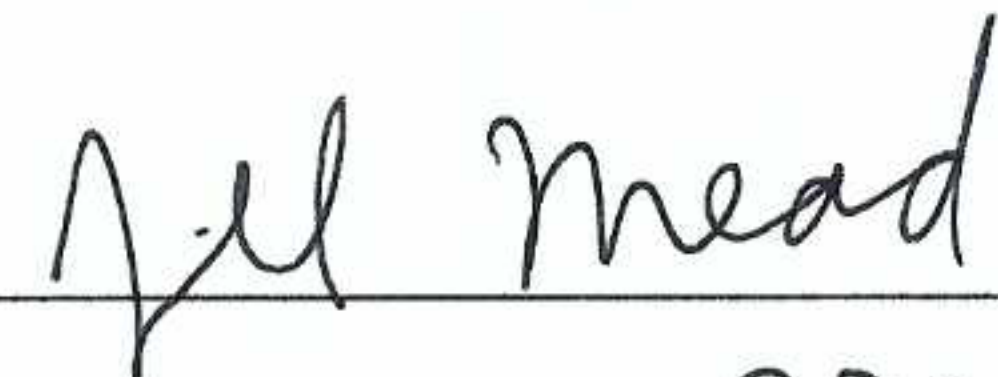
Ronald J. Amen, Board Chairman, Treasurer, and Executive Vice President of Atrium Economics, Inc. being duly sworn, states that he has drafted and/or supervised the preparation of responses to certain requests for information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Ronald J. Amen

The foregoing Verification was signed, acknowledged and sworn to before me this 27th day of July 2026, by Ronald J. Amen.





Notary Commission No. 22019875

Commission expiration: March 16, 2030

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

In the Matter of:)
)
ELECTRONIC APPLICATION OF) Case No. 2026-00099
COLUMBIA GAS OF KENTUCKY, INC.)
FOR AN ADJUSTMENT OF RATES;)
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APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF DONALD P. AYERS

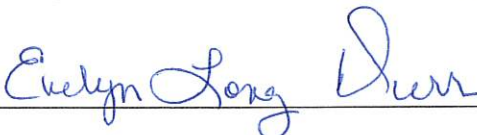
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF FAYETTE)

Donald P. Ayers, Vice President, Gas Operations for Columbia Gas of Kentucky, Inc., being duly sworn, states that he has drafted and/or supervised the preparation of responses to certain requests for information 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.



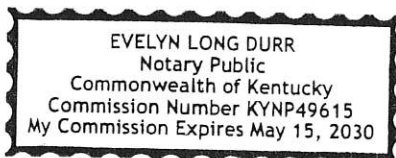
Donald P. Ayers

The foregoing Verification was signed, acknowledged and sworn to before me this 23rd day of July 2026, by Donald P. Ayers.



Notary Commission No. KYNP49615

Commission expiration: May 15, 2030



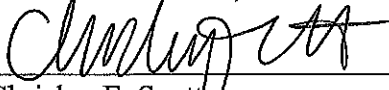
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BEFORE THE PUBLIC SERVICE COMMISSION**

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FOR AN ADJUSTMENT OF RATES;)
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APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF CHRISLEY E. SCOTT

STATE OF OHIO)
)
COUNTY OF FRANKLIN)

Chrisley E. Scott, Senior Director Capital Planning and Support Services for NiSource Corporate Services Company, on behalf of Columbia Gas of Kentucky, Inc., being duly sworn, states that she has drafted and/or supervised the preparation of responses to certain requests for information 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.



Chrisley E. Scott

The foregoing Verification was signed, acknowledged and sworn to before me this 29 day of July 2026, by Chrisley E. Scott.

Ashley G. LaRock
Attorney At Law
Notary Public, State of Ohio
My Commission has no expiration date
Sec. 147.03 R.C.



Notary Commission No. NA
Commission expiration: NA

**COMMONWEALTH OF KENTUCKY
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FOR AN ADJUSTMENT OF RATES;)
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APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF JUDY M. COOPER

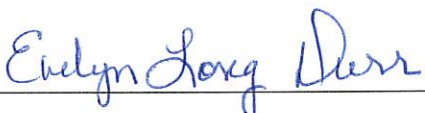
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF FAYETTE)

Judy M. Cooper, Director of regulatory Affairs for Columbia Gas of Kentucky, Inc., being duly sworn, states that she has drafted and/or supervised the preparation of responses to certain requests for information 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.

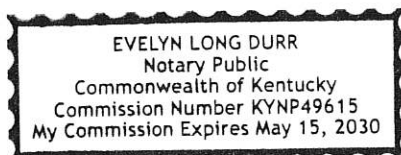


Judy M. Cooper

The foregoing Verification was signed, acknowledged and sworn to before me this 29th day of July 2026, by Judy M. Cooper.



Notary Commission No. KYNP 49615
Commission expiration: May 15, 2030



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

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APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF MICHAEL E. GIRATA

STATE OF OHIO)
)
COUNTY OF FRANKLIN)

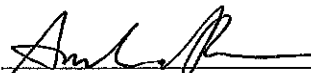
Michael E. Girata, Manager of Financial Planning & Analysis for NiSource Corporate Services Company, on behalf of Columbia Gas of Kentucky, Inc., being duly sworn, states that he has drafted and/or supervised the preparation of responses to certain requests for information in the above-referenced case 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.



Michael E. Girata

The foregoing Verification was signed, acknowledged and sworn to before me this 30 day of July 2026, by Michael E. Girata.

Ashley G. LaRock
Attorney At Law
Notary Public, State of Ohio
My Commission has no expiration date
Sec. 147.03 R.C.



Notary Commission No. NA
Commission expiration: NA

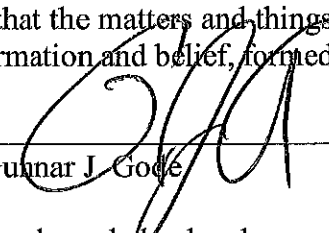
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APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF GUNNAR J. GODE

STATE OF OHIO)
)
COUNTY OF FRANKLIN)

Gunnar J. Gode, Senior Vice President, Chief Accounting and Tax Officer for NiSource Corporate Services Company, on behalf of Columbia Gas of Kentucky, Inc., being duly sworn, states that he has drafted and/or supervised the preparation of responses to certain requests for information 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.



Gunnar J. Gode

The foregoing Verification was signed, acknowledged and sworn to before me this 30 day of July 2026, by Gunnar J. Gode.

Ashley G. LaRock
Attorney At Law
Notary Public, State of Ohio
My Commission has no expiration date
Sec. 147.03 R.C.



Notary Commission No. NA

Commission expiration: NA

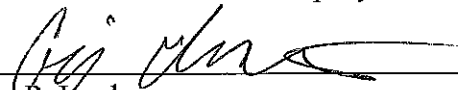
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OTHER RELIEF)

VERIFICATION OF CRAIG P. INSCHO

STATE OF OHIO)
)
COUNTY OF FRANKLIN)

Craig P. Inscho, Manager, Financial Planning & Analysis for NiSource Corporate Services Company, on behalf of Columbia Gas of Kentucky, Inc., being duly sworn, states that he has drafted and/or supervised the preparation of responses to certain requests for information 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.



Craig P. Inscho

The foregoing Verification was signed, acknowledged and sworn to before me this 28 day of July 2026, by Craig P. Inscho.

Ashley G. LaRock
Attorney At Law
Notary Public, State of Ohio
My Commission has no expiration date
Sec. 147.03 R.C.



Notary Commission No. NA
Commission expiration: NA

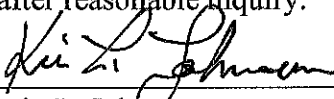
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OTHER RELIEF)

VERIFICATION OF KEVIN L. JOHNSON

STATE OF OHIO)
)
COUNTY OF FRANKLIN)

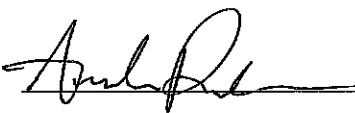
Kevin L. Johnson, Lead Regulatory Studies Analyst for NiSource Corporate Services Company, on behalf Columbia Gas of Kentucky, Inc., being duly sworn, states that he has drafted and/or supervised the preparation of responses to certain requests for information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Kevin L. Johnson

The foregoing Verification was signed, acknowledged and sworn to before me this 30
day of July 2026, by Kevin L. Johnson.

Ashley G. LaRock
Attorney At Law
Notary Public, State of Ohio
My Commission has no expiration date
Sec. 147.03 R.C.



Notary Commission No. NA
Commission expiration: NA

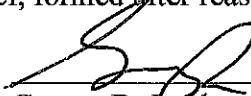
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APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF GEORGE B. JONDA

STATE OF OHIO)
)
COUNTY OF FRANKLIN)

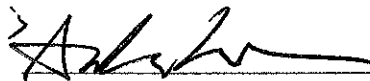
George B. Jonda, Manager Financial Planning & Analysis for NiSource Corporate Services Company, on behalf of Columbia Gas of Kentucky, Inc., being duly sworn, states that he has drafted and/or supervised the preparation of responses to certain requests for information in the above-referenced case and 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.



George B. Jonda

The foregoing Verification was signed, acknowledged and sworn to before me this 22
day of July 2026, by George B. Jonda.

Ashley G. LaRock
Attorney At Law
Notary Public, State of Ohio
My Commission has no expiration date
Sec. 147.03 R.C.



Notary Commission No. NA

Commission expiration: NA

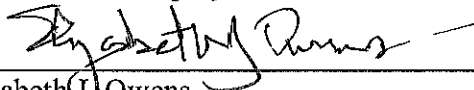
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APPROVAL OF DEPRECIATION STUDY;)
APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF ELIZABETH J. OWENS

STATE OF OHIO)
)
COUNTY OF FRANKLIN)

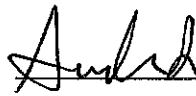
Elizabeth J. Owens, Director of Compensation for NiSource Corporate Services Company, on behalf of Columbia Gas of Kentucky, Inc., being duly sworn, states that she has drafted and/or supervised the preparation of responses to certain requests for information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.



Elizabeth J. Owens

The foregoing Verification was signed, acknowledged and sworn to before me this 28 day of July 2026, by Elizabeth J. Owens.

Ashley G. LaRock
Attorney At Law
Notary Public, State of Ohio
My Commission has no expiration date
Sec. 147.03 R.C.



Notary Commission No. NA
Commission expiration: NA

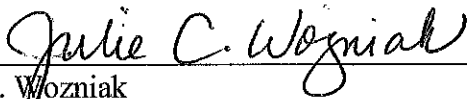
**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

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FOR AN ADJUSTMENT OF RATES;)
APPROVAL OF DEPRECIATION STUDY;)
APPROVAL OF TARIFF REVISIONS; AND)
OTHER RELIEF)

VERIFICATION OF JULIE C. WOZNIAK

STATE OF OHIO)
)
COUNTY OF FRANKLIN)

Julie C. Wozniak, Manager, Regulatory Studies for NiSource Corporate Services Company, on behalf of Columbia Gas of Kentucky, Inc., being duly sworn, states that she has drafted and/or supervised the preparation of responses to certain requests for information 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

The foregoing Verification was signed, acknowledged and sworn to before me this 28 day of July 2026, by Julie C. Wozniak.



Ashley G. LaRock
Attorney At Law
Notary Public, State of Ohio
My Commission has no expiration date
Sec. 147.03 R.C.

Notary Commission No. NA

Commission expiration: NA

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to KRS 278.130 as amended by Section 104 of House Bill 757.

- a. Provide the amount of the most recent PSC Assessment.
- b. Provide the amount of the PSC Assessment included in the base period and the forecast period, respectively.
- c. Explain how Columbia Kentucky accounted for this increase in this application generally.

Response:

- a. The PSC Assessment Fee remitted in January 2026 was \$256,416.97.
- b. Please see the table below.

PCS Fee	Amount (\$)	Application Reference
PSC Assessment Fee expense for the unadjusted Base Period	\$319,826	Tab 72, FR 807 KAR 5:001 Section 16-(8)(a), Workpaper WPD-2.4.A, Line 33
PSC Assessment Fee expense in the unadjusted Forecasted Test Period	\$285,204	Tab 72, FR 807 KAR 5:001 Section 16-(8)(a), Workpaper WPD-2.4.B, Line 33
Adjusted PSC Assessment Fee expense (included in the revenue requirement)	\$369,755	Tab 72, FR 807 KAR 5:001 Section 16-(8)(a), Workpaper WPD-2.7.F, Line 3

- c. Columbia adjusted the PSC Assessment Fee expense to reflect the recent passage of House Bill 757, which amended KRS 278.130. In addition, Columbia incorporated the updated PSC Assessment Fee rate of 0.23 percent in the calculation of the gross revenue conversion factor. For reference in Columbia's Application, Columbia's treatment of the PSC Assessment Fee may be found in Witness Davis's Direct Testimony at Page 19 (describing Schedule D-2.7, Adjustment 6); Tab 72, FR 807 KAR 5:001 Section 16-(8)(a), Schedule H-1, Line 3; and Tab 72, FR 807 KAR 5:001 Section 16-(8)(a), Workpaper WPD-2.7.F.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to the Attachment to Informal Conference Memo, page 11. Provide the NiSource Corporate Services Company (NCSC) gross payroll for calendar 2025 for each NCSC affiliate. Include in the response the percentage of the NCSC total payroll, the number of employees included in the payroll.

Response:

The Annual Total NiSource Corporate Services Company ("NCSC") Gross Base Salaries at December 31, 2025, plus Overtime and Premium Pay for TME December 2025, from the NiSource Payroll Department is \$291,684,705 (as reflected in Tab 72, FR 807 KAR 5:001 Section 16-(8)(a), Workpaper WPD-2.7.J(2), Line 2). Please refer to 2026-00099_PSC_Staff_DR_Set_3_No_2_Attachment_A_CONFIDENTIAL for the corresponding dollar amounts and percentages by affiliate. For purposes of this response, the Company utilized Calendar Year 2025 general ledger actuals as the basis for applying the affiliate allocation percentages to the Annual Total NCSC Gross Base Salaries at December 31, 2025, plus Overtime and Premium Pay for TME December 2025.

The number of active NCSC employees at December 31, 2025, as provided by the NiSource Human Resources Department was 2,584 and as shown in 2026-

00099_PSC_Staff_DR_Set_3_No_2_Attachment_B. Please also refer to Columbia's response to KY PSC Staff 3-24, specifically Attachment B for the number of employees for calendar year 2025.

ATTACHMENT A
FILED UNDER SEAL
PURSUANT TO A
MOTION FOR
CONFIDENTIAL
TREATMENT

**ATTACHMENT B
IS AN EXCEL
SPREADSHEET
AND UPLOADED
SEPARATELY**

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 3.

- a. Explain how shortening Columbia Kentucky's rate case expense amortization for the instant proceeding correlates to increasing its earned rate of return.
- b. Explain whether the Commission has ever set a one-year amortization period for Columbia Kentucky to amortize its rate case expenditures.
- c. Explain whether Columbia Kentucky would continue to have the concern of erosion of its earned rate of return if the Commission approved an increase in base rates in this case.

Response:

- a. Generally, Operating Expense amortizations, including Rate Case Expense Amortization, have no impact on a company's earned rate of return. The level of revenue reflected in a revenue requirement for the rate case expense amortization is equal to the expense to be amortized on the company's books. As such, there is no impact on the company's net operating income from the

amortization of rate case expense, thereby no impact to an earned rate of return. A company's earned rate of return calculation is reflective of its total unadjusted or adjusted operating revenues and expenses for a specific period. A primary reason for proposing a one-year amortization of rate case expense was to more directly align the length of time the costs were incurred with the timing of recovery.

- b. Columbia is not aware of the Commission previously approving a one-year amortization period of the Company's rate case expense.
- c. It is difficult for Columbia to answer this question as it is an incomplete hypothetical that lacks the requisite specifics to answer fully. Nevertheless, it stands to reason that there would be less erosion of the Company's earned rate of return if the Commission approved an increase in base rates, all else held equal, including the one-year amortization of rate case expense.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's Second Request, Item 5. Refer also to the Application, Volume Five, Tab 72 at Schedule F-1.A through Schedule F-1.C.

- a. Explain how Columbia Kentucky was able to budget the Operations and Maintenance (O&M) expense exclusions in the forecasted test year for Corporate Dues and Memberships, yet was unable to budget the total expenses for each individual Dues-Requiring-Organizations in the test year.
- b. Explain whether Columbia Kentucky has the ability to forecast its O&M expenses at a more granular level.

Response:

a. and b.

Columbia's budget is not done on a vendor-specific level; therefore, the Corporate Dues and Memberships budget is not itemized on an organizational/membership-specific level. Please see the testimony of Company witnesses Jonda and Inscho for a further explanation of how Columbia formulates its budget for the BP and FTP.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's Second Request, Item 9.

- a. Provide the accounts Columbia Kentucky references when it states that it does not forecast "certain other gas revenues."
- b. Explain why Columbia Kentucky does not forecast unbilled revenues, off-system sales revenues, and certain other gas revenues, as explained in response to Staff's Second Request, Item 5(a).

Response:

- a. Columbia does not forecast "certain other gas revenues" recorded to Account 49500000, primarily specific to alternative revenue recognition entries recorded in actuals to account for the difference in recoveries as compared to the Commission approved SMRP revenue requirement. As the SMRP budgeted operating revenues are reflective of the SMRP revenue requirement, a budget to Account 49500000 is not needed and is appropriately reflected as \$0.
- b. Columbia forecasts billed revenues for 12 billing cycles by customer for Commercial and Industrial customers and by rate schedule for Residential

customers. This approach assigns volumes by customer and rate block, eliminating the need to separately forecast unbilled volumes.

Columbia removes off-system sales revenues from test year revenue, consistent with the treatment of purchased gas cost revenue (expense). Any off-system sales revenues (margin) retained by the Company is excluded from base rates as the margin revenues are returned to customers through the Purchased Gas Adjustment mechanism. Accordingly, off-system sales have no impact on the base rate revenue requirement.

As to “certain other gas revenues” please see Columbia’s response to Part a.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's Second Request, Item 29, Attachment A, page 7.

- a. Provide Attachment A in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.
- b. Explain the approximate \$2,278,434 increase in Columbia Kentucky's "Outside Service Employed" Expense from calendar year 2025 to the forecasted test period.

Response:

- a. and b.

Please see 2026-00099_PSC_Staff_DR_Set_3_No_6_Attachment_A for a revised Excel version of 2026-00099_PSC_Staff_DR_Set_2_No_29_Attachment_A providing allocation of the budget to the FERC subaccounts as the initial response allocated costs to the 3-digit FERC Account (i.e. 923); thereby, capturing both 92300000 and 92301000 in a single line-item. 2026-00099 PSC Staff DR Set 3 No 6 Attachment A splits those amounts out by sub-account into 92300000 and 92301000. As shown in 2026-00099_PSC_Staff_DR_Set_2_No_29_Attachment_A, the "Outside Services

Employed” expense (account 92300000) for the FTP reflects a *decrease* of \$114,689 for the FTP (\$4,904,0287) as compared to calendar year 2025 (\$5,018,717).

It is important to note that the Company’s budget is not prepared at a FERC Account level basis. The Company utilized calendar year 2025 actuals as a basis of allocation in arriving at the budgeted Base Period and FTP FERC Account amounts in the original response and the revised Attachment included herein.

**ATTACHMENT
IS AN EXCEL
SPREADSHEET
AND UPLOADED
SEPARATELY**

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's Second Request, Item 36. Explain why Columbia Kentucky is including expenditures in the forecasted test year for a project that has yet to be approved by the Commission.

Response:

The expenditures associated with customer service software system upgrades included in the forecasted test year are those expected to be incurred during the period.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to the Attorney General's First Request for Information (Attorney General's First Request), Item 16, Attachment A at cell J7. Confirm that the adjustment amount should be a reduction to rate base, as opposed to an addition to rate base. If not confirmed, explain the response.

Response:

Columbia confirms that the rate base amount of \$109,259,903 reflected in Excel cell J7 of Attachment A to the Attorney General's First Request, Item 16, represents a reduction to Rate Base to remove SMRP as described in the direct testimony of Witness Black, and consistent with the adjustment description reflected in Excel cell C7 and the adjustment purpose and description reflected in Excel cell G7.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

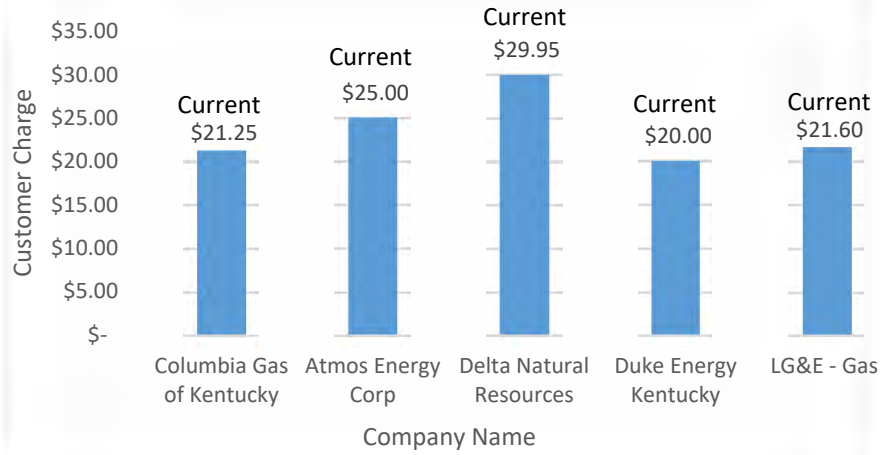
Refer to Columbia Kentucky's response to the Attorney General's First Request, Item 23.

- a. Provide a chart comparing Columbia Kentucky's current monthly residential customer charge to the monthly residential customer charge of other similarly situated gas utilities in Kentucky.
- b. Provide a chart comparing Columbia Kentucky's proposed monthly residential customer charge to the monthly residential customer charge of other similarly situated gas utilities in Kentucky.

Response:

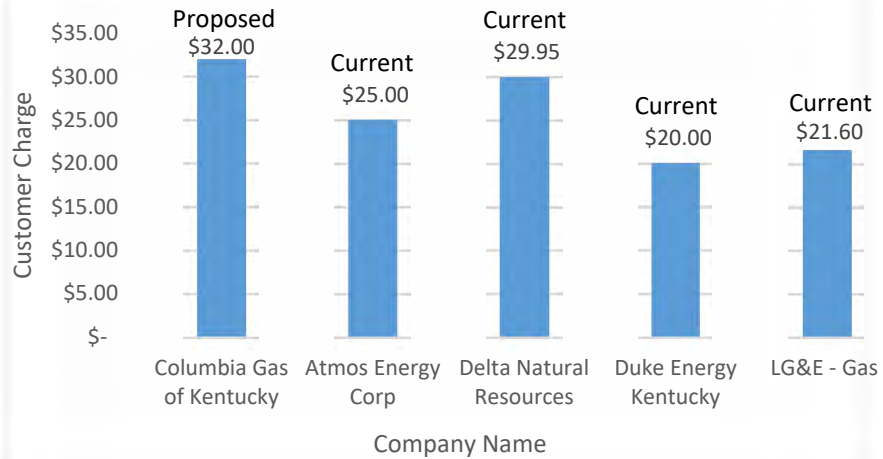
a. and b. Please see the charts below comparing Columbia's current and proposed residential customer charge to the current customer charge of other similarly situation gas utilities in Kentucky.

Columbia Gas of Kentucky - Current Customer Charge*



* All customer charges are current

Columbia Gas of Kentucky - Proposed Customer Charge*



* Columbia customer charge is proposed and all other customer charges are current

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to the Attorney General's First Request, Item 30, Attachment A.

- a. Specifically pertaining to scheduling required meter changes instead of cold calling, provide the amount of overtime savings that Columbia Kentucky experienced related to meter changes.
- b. Quantify the savings from reassigning the retired leakage technician's job responsibilities and eliminating the leakage technician vacancy. Further explain whether these savings are reflected in the forecasted test period.
- c. Provide the amounts that Columbia Kentucky saved on contractor costs by in-sourcing the work typically performed by contractors. Further explain how these savings are reflected in the forecasted test period.
- d. Provide the amounts that Columbia Kentucky saved by having a trainer travel to Lexington to do training classes rather than sending Columbia Kentucky employees out of state to training centers. Further explain whether those savings are reflected in the forecasted test period.

Response:

a. The company does not separately distinguish overtime specifically attributable to meter changes nor does the Company have a system identifier to distinguish overtime savings specifically attributable to meter changes. However, the budgeting process accounts for savings or cost avoidance for total O&M, which was captured in the development of the BP budget and FTP. Specifically, overtime is monitored during monthly budget reviews and overtime underruns can be inferred due to reduced meter change units and other operational activities.

b. The leakage inspector position was vacated in September 2025. At which point, work was transferred to a Senior Work Coordinator and 50% of their time is charged to Columbia resulting in total realized savings of \$70,770. The savings are included in the forecasting process and reflected in the BP budget and FTP.

c. SCADA work in-sourced realized \$550,000 savings in 2025. Corrosion remediation was in-sourced as much as possible in 2025, instead of hiring contractors resulting in \$111,000 in savings based upon the fact that in 2024, the company spent \$311,000 on corrosion remediation using contractor services, while in 2025, the Company spent approximately \$200,000 on corrosion remediation, using contractor services. In 2025 test stations were read by Company employees, which lowered contractor spend by \$23,000. Additional savings have been realized by clearing grade 2 leaks prior to the sixth month. This reduces the number of required reinspects which

allows us to perform leakage inspection on mains and services or curb box inspections that would normally be performed by contractors. These savings are realized as part of the forecasting process and reflected in the BP budget and FTP.

d. Columbia avoided \$53,550 in employee travel expense by having a trainer onsite in Lexington in lieu of seventy-three employees traveling to the out of state training center. The trainers' expenses totaled \$3,150 (14 days of travel x \$225 per day) for a net avoidance of \$50,550. The cost avoidance is realized as part of the budget process and reflected in the BP budget and FTP.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to the Attorney General's First Request, Item 32(b). Explain why only 2.3 miles of pipe mileage were replaced in 2025 when 10.7 miles of pipe mileage were replaced in the preceding year.

Response:

There was a typo in the initial response. Miles of pipe replaced in 2025 should have read 12.3 miles.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to the Attorney General's First Request, Item 38, Attachment A at Line 1, "Rate Base." Refer also to Columbia Kentucky's response to the Attorney General's First Request, Item 18(a). The cash working capital adjustment, as supported by Attachment A, is \$(11,137,929), yet in Columbia Kentucky's response to the Attorney General's First Request, Item 18(a), Columbia Kentucky states that the Lead Lag study resulted in a calculated cash working capital of \$(11,189,551). Reconcile the difference between the two amounts.

Response:

Columbia's cash working capital amount of \$(11,189,551) is calculated prior to inclusion of cash working capital in rate base and revenue requirement. When cash working capital is included in rate base it produces a change in interest (rate base multiplied the weighted cost of debt) and income tax expense (operating income less interest). As the pro forma expenses change, the lead lag calculation of the pro forma interest and income tax expenses provides a change to cash working capital. Inclusion of cash working capital in rate base produces an iterative calculation in the calculation of a revenue requirement. The iterative impacts to taxable income, via the interest deduction, and income tax

expense are demonstrated in Schedule E-1.2 (supported by Columbia witness Gode). The \$(11,137,929) is the amount of cash working capital as a result of its inclusion as a reduction to rate base and all iterative impacts to pro forma expenses.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to the Attorney General's First Request, Item 48.

Explain the drivers that caused Columbia Kentucky's actual capital spend to exceed its budgeted capital expenditures for the years 2021 through 2023. Further, explain how Columbia Kentucky will address these concerns in the forecasted test period.

Response:

As noted in the Direct testimony of Witness Scott, the budgeting process for NiSource is a continual management process. The amounts set forth in the response to Attorney General's First Request, Item 48 were compared to the initial budget set prior to beginning of each respective calendar year. Columbia updates its budgets throughout the year to reflect changes in capital allocations, which is a practice that is considered normal within industry as work progresses in the field. The final capital budgets for each respective year were as follows:

Year	Amount \$000
2025	\$77,598
2024	\$68,268
2023	\$74,295
2022	\$78,103
2021	\$72,742

Budget variances are expected based upon the type of work that is performed by a regulated utility because actual spend must address both planned and unplanned work, such as customer requests (including municipalities), emergency work, and the condition of assets in the field. The actual spend for 2021 through 2025 were all within less than 5% of the final budgeted amounts.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to the Attorney General's First Request, Item 54(g). Identify and explain in detail the tangible benefits that Columbia Kentucky's ratepayers receive as a result of utilizing corporate aircraft as opposed to commercial airlines.

Response:

Travel on corporate aircraft is for activities such as Energy Conferences, Industry Meetings, Internal Meetings, Investor Relations, Partner Meetings, and Vendor Meetings. Although these activities relate to NiSource's business operations, Columbia customers benefit from such activities through, among other things, increased participation in industry forums, strengthened vendor and partner relationships that may contribute to more favorable contract terms, and improved workforce efficiency when NiSource leadership or employees are able to attend and participate in meetings in person.

In addition, the reduced travel time has tangible benefits to Columbia customers by optimizing productive time of those individuals traveling. In a high level estimate, utilizing commercial aircraft results is an estimated productivity loss of approximately 8 to 12 hours per flight when considering total travel time to major airport hubs vs. smaller

airports closer to meeting locations, limited commercial schedule availability, TSA wait time, aircraft delays, and the impact on work performed on subsequent days. Considering the average passenger load is three, this equates to approximately 4,500 annual hours of avoided lost productivity. On top of this, the incremental cost of flights, which typically are not planned more than a few weeks in advance, result in additional costs of lodging. Commercial airline schedules often dictate additional overnight stays between arrival/departure availabilities, instead of day trip flexibility offered by corporate aviation. Additional overnights lead to increased hotel, ground transportation, and meals expense. Unforeseen issues such as commercial delays or missing connecting flights add further risk of missing critical meetings.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's Second Request, Item 23. Explain whether it is typical FERC approved accounting practice to combine pipe fitting into the mains cost in the plant account.

Response:

Yes. Under the FERC Uniform System of Accounts (18 C.F.R. Part 201), Account 376 – Mains includes the cost of distribution mains, including associated pipe and fittings. The FERC accounting instructions identify "Pipe and fittings" as items included in Account 376. The Uniform System of Accounts does not prescribe separate plant accounting for pipe versus fittings within Account 376. Accordingly, it is typical accounting practice for the costs of pipe and associated fittings to be recorded together in the mains plant account.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's Second Request, Item 24b and Item 25.

- a. Confirm that the Main Line Delivery Service (MLDS) class is 440 percent above its revenue responsibility at an equalized rate of return. If unable to confirm, explain.
- b. Explain why Columbia Kentucky continues to propose that MLDS recover more than its cost-to-serve for the benefit of the Residential class.
- c. Explain whether Columbia Kentucky has considered only increasing the rate for the Residential class in an effort to move it closer to its cost-to-serve.
- d. Explain whether Columbia Kentucky has considered increasing the rates for all classes except for MLDS in an effort to lower the revenue responsibility for MLDS.

Response:

- a. The proposed revenue allocation to the MLDS customer class is 440% above the revenue responsibility at equalized rate-of-return resulting from the allocated cost of service study (ACOSS).

- b. The proposed allocations, including that for the MLDS class, were designed to keep the revenue-to-cost responsibility for all classes at approximately the same ratio at current rates while mitigating rate impacts for the residential class.
- c. Columbia Kentucky did not consider only increasing the rate for the Residential class. Based on the results of the class cost of service study, under current rates the Residential, General Service Other and Interruptible Delivery Service customer classes' revenues are below their respective cost of service. Increasing the rate for only the Residential class would result in residential customers subsidizing the General Service Other and Interruptible Deliver Service customers. Columbia does not consider this a viable solution.
- d. Columbia has not considered increasing the rates for all classes except for MLDS. As discussed in my direct testimony on page 45, the benchmark option for revenue allocation was to move all classes to their cost to serve, which resulted in decreasing rates for the MLDS and IUS classes. As a matter of judgement, however, it was decided this method was not the preferred solution to the interclass revenue allocation issues. Instead, the Company's preferred revenue allocation approach resulted in revenue to cost responsibility for all classes that approximated their parity ratio levels under current rates with no reduction in the existing interclass rate subsidies.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's First Request, Item 1, Attachment A, page 1, line 4.

- a. Describe the drivers behind the 178.45 percent increase in property tax expense between calendar year 2023 and 2024.
- b. Explain whether Columbia Kentucky protested any property tax valuations received in 2024, 2025, or 2026. If so, provide documentation supporting the protest and the outcome of that protest.

Response:

- a. The increase in property tax expense from 2023 to 2024 was primarily driven by the settlement of property taxes for tax years 2020 through 2022. A total of \$3.25 million was settled in 2023, which reduced property tax expense in 2023. Excluding this settlement impact, the actual property tax expense recorded in 2023 was \$6,366,285. Also, 2024 expense classified pipeline property as tangible personal property, which is taxed at a higher rate due to the *Marathon* ruling from the Kentucky Court of Appeals.

Pipeline property for tax year 2023 was expensed as real property, which is taxed at a lower rate.

- b. No, Columbia Kentucky did not formally protest any property tax valuations received in 2024 or 2025 (the 2026 valuation has not yet been received).

Instead, Columbia, Kentucky participates in an informal negotiation process regarding values before the assessed value is finalized. The table below depicts the negotiated decreases to expense for tax years 2024 and 2025.

Tax Year	True-Up Amount
2024	\$0.581 million
2025	\$2.1 million
Total	\$2.68 million

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's First Request, Item 6, Attachment B.

Provide a general description of the scope of work or activities, and how they benefit

Kentucky customers, associated with the affiliate charges from the following vendors:

- a. Concentric Energy Advisors, Inc.
- b. Continuum Capital, LLC.
- c. E Source Companies LLC
- d. Executive Consultants United, LLC
- e. Guidehouse, Inc.
- f. McKinsey & Company, Inc.
- g. NetJets Aviation Inc.
- h. Pekron Consulting
- i. Pinkerton Consulting & Investigations
- j. R&D Acquisitions, Inc.
- k. Regulatory Capital Consultants, L.L.C.

Response:

- a. **Concentric Energy Advisors, Inc.:** Concentric Energy Advisors conducted a market assessment that assisted Columbia in the validation of its detailed demand

forecast. This validation confirmed that Columbia's methodology is reasonable in the context of this rate case.

- b. **Continuum Capital, LLC.** Continuum Capital evaluated Columbia's gas distribution construction lifecycle process, focusing on streamlining execution and delivering capital efficiency opportunities. With this information, efficiencies realized through these opportunities are anticipated to be reinvested back into Columbia's capital program for the benefit of customers.
- c. **E Source Companies LLC.** E Source provides access to utility industry research, benchmarking data, customer experience insights, operational best practices, and subject matter expertise to improve customer experience. These resources help Columbia evaluate performance relative to industry peers, identify emerging trends, assess customer needs and expectations, and inform strategic and operational decision-making. The subscription enables Columbia to make data-driven decisions that enhance service quality, operational effectiveness, and value for customers.
- d. **Executive Consultants United, LLC.** Executive Consultants' services focus on improving cross-functional collaboration and providing strategic guidance to support complex transformation efforts are delivered effectively, with minimal disruption to operations, strong quality outcomes, and disciplined financial management, all of which benefit customers.

- e. **Guidehouse, Inc.:** Upon further investigation in preparation for this response, Columbia identified that Guidehouse, Inc. expenses should have been removed from its FTP in the amount of \$790 adjusted for inflation in arriving at the amount to remove from the revenue requirement.
- f. **McKinsey & Company, Inc.:** Upon further investigation in preparation for this response, Columbia identified that McKinsey & Company, Inc. expenses should have been removed from its FTP in the amount of \$8,972 adjusted for inflation in arriving at the amount to remove from the revenue requirement.
- g. **NetJets Aviation Inc.:** Please see Columbia's response to KY PSC Staff 3-14 for further information on the benefits and use of corporate aircraft. Columbia identified a budget allocation correction to the FTP for NetJets in the amount of \$35,619 that will be excluded from the Company's future revenue requirement update.
- h. **Pekron Consulting:** Pekron Consulting performs mandatory asbestos building surveys and Ergonomic Evaluation videos are provided to field employees to aid in injury prevention, thus reducing potential costly workplace injuries. In addition to promoting the health and safety of building occupants, these surveys help mitigate costly fines from regulatory agencies arising from noncompliance and/or costly litigation arising from employee exposures. These reduced risks and associated costs/fines inure to the benefit of customers.

- i. **Pinkerton Consulting & Investigations:** Upon further investigation in preparation for this response, Columbia identified that Pinkerton Consulting & Investigations expenses should have been removed from its FTP in the amount of \$7,904 adjusted for inflation in arriving at the amount to remove from the revenue requirement.in 2025.
- j. **R&D Acquisitions, Inc.:** R&D Acquisitions, Inc. d/b/a MSR provides independent customer satisfaction (CSAT), relationship, and Voice of the Customer research. Through survey administration, analytics, and customer feedback collection, they help Columbia understand customer needs, identify pain points, and measure the effectiveness of customer experience initiatives that may help Columbia make data-driven decisions, prioritize improvements, and track progress toward customer experience and satisfaction goals.
- k. **Regulated Capital Consultants, L.L.C.:** Regulated Capital Consultants (“RCC”) provides accounting and tax support services specifically related supporting our Powerplan modules that is the subledger for all our plant and fixed asset related activities. Powerplan is the software that houses the PowerPlant (for fixed assets) and Powertax (tax) systems. RCC has specialized expertise with Powerplan in general and our implementation and processing. Specifically, they assist with special projects that increase the efficiency and accuracy of maintaining our plant records, as well as facilitating our tax depreciation forecasts and actual tax

depreciation studies for our annual tax returns. All of these systems and activities are required to keep the books and records to support CKY's plant balances, depreciation expense and related tax accounts, which benefits customer accordingly.

KY PSC Case No. 2026-00099
Response to Staff's Data Request Set Three No. 19
Respondent: Elizabeth N. Davis, George B. Jonda

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's First Request, Item 6, Attachment B.

Provide a breakdown of the charges labeled "Manual Journal Vouchers – Various".

Response:

Please refer to 2026-00099_PSC_Staff_DR_Set_3_No_19_Attachment_A for the details of the "Manual Journal Vouchers – Various" amounts included in Staff's First Request, Item 6, Attachment B.

**ATTACHMENT
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AND UPLOADED
SEPARATELY**

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's First Request, Item 7, Attachment B.

Provide a general description of the scope of work or activities, and how they benefit

Kentucky customers, associated with the affiliate charges from the following vendors:

- a. Bully Pulpit Interactive, LLC
- b. Lee Enterprises, Inc
- c. Gerard Media, LLC
- d. Charles Ryan Associates, Inc.

Response:

In reference to Staff's First Request No. 7, Attachment B, please see below for the requested vendors:

- a. **Bully Pulpit Interactive, LLC**: The Company has removed the costs associated with this vendor from the FTP revenue requirement.
- b. **Lee Enterprises, Inc.**: The Company engaged this vendor to execute a campaign designed to reduce third-party damages to Company facilities in Kentucky. Prevention of such damages benefits customers by reducing the likelihood of service interruptions, avoiding unnecessary deployment of emergency services

and the associated public costs, and supporting the continued safe and reliable delivery of natural gas within the communities served by the Company.

- c. **Gerard Media LLC**: The Company has removed the costs associated with this vendor from the FTP revenue requirement.
- d. **Charles Ryan Associates, Inc.**: Charles Ryan Associates, Inc. assisted Columbia with its Start, Stop, Move Service Campaign, which is intended to educate customers regarding service-related processes. The education program benefits customers by educating them on the process involved in Start, Stop and Move Services to improve the customer experience and reduce customer call times.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), WPD-2.7 B(2), page 174, Line 6. Explain the basis for the forecasted 4 percent merit increase in 2027. Provide the target merit increases provided to bargaining and non-bargaining employees of Columbia Gas and NiSource CSC for each of the last ten years.

Response:

As demonstrated in Witness Owens' 2026-00099 testimony in Attachment EJO-4 (Non-Union Merit Increase Market Data), NiSource's recent annual merit increases have slightly lagged the national, regional, and industry merit increases. Based on the information contained in Attachment EJO-4, the Company has forecasted a four percent merit increase for the FTP due to internal trends and marketplace benchmarks in order to retain and attract talent.

Please see table below for the general wage and merit increases granted over the last ten (10) calendar years to Columbia Gas of Kentucky and NiSource Corporate Service Company.

Year Granted	Union ¹	Non-Exempt (Non-Union)	Exempt
2026	TBD ^{1,2}	3%	3%
2025	2.5%	3%	3%
2024	3%	4%	4%
2023	3%	3%	3%
2022	3%	3%	3%
2021	3.5%	3%	3%
2020	3%	3%	2.3%
2019	2%	3%	3%
2018	3%	3%	3%
2017	2%	3%	3%
2016	3%	3%	3%

¹United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union “Local 372”

² Union wages are on a cycle that begins on December 1 each year pursuant to the collective bargaining agreement. The current collective bargaining agreement expires on November 30, 2026.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), WPD-2.7 B(2), page 174 Line 2.

- a. Provide the basis for the annual gross salary at December 31, 2025. For example, explain whether that figure is based upon the actual calendar year 2025 gross salary expenses, the December 2025 monthly gross salary expense multiplied by 12, or some other derivation.
- b. Provide all supporting workpapers and calculations in Excel with native executable format with links and formulas intact. Provide the monthly gross base salary for each month in calendar year 2025.

Response:

- a. Columbia employee labor amounts reflected on WPD-2.7.B(2), Line 2, are based on actual annual wage / base salary information as of December 2025 per the NiSource Payroll Department and as reflected on each employee's Form W-2, as described in the testimony of Witness Davis regarding Adjustment 2, at page 18.
- b. Please refer to 2026-00099_PSC_Staff_DR_Set_3_No_22_Attachment_A, which provides the supporting workpapers in Excel format reflecting Calendar Year 2025 actual annual wage / base salaries by month for Columbia.

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SEPARATELY**

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), WPD-2.7 J(2), page 186, Line 2.

- a. Provide the basis for the annual gross salary at December 31, 2025. For example, explain whether that figure is based upon the actual calendar year 2025 gross salary expenses, the December 2025 monthly gross salary expense multiplied by 12, or some other derivation.
- b. Provide all supporting workpapers and calculations in native executable format with links and formulas intact. Provide the monthly gross base salary for each month in calendar year 2025.

Response:

- a. NiSource Corporate Service Company ("NCSC") employee labor amounts reflected on WPD-2.7.J(2), Line 2, are based on actual annual wage / base salary information as of December 2025 per the NiSource Payroll Department and as reflected on each employee's Form W-2, as described in the testimony of Witness Davis regarding Adjustment 9.3, at page 20. Additionally, a level of overtime and premium pay is included based on the twelve-months-ended December 2025

actual experience as per the payroll reports received from the NiSource Payroll Department.

- b. Please refer to 2026-00099_PSC_Staff_DR_Set_3_No_23_Attachment_A, which provides the supporting workpapers in Excel format reflecting Calendar Year 2025 actual annual wage / base salaries by month for NCSC.

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COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), WPD-2.7 J(5), page 189. Provide an anonymized list of employees who have left Columbia Kentucky or NiSource CSC since Dec. 31, 2025. Include each employee's job title, salary, allocation to CKY for 2025, O&M experience ratio, incentive compensation, and gross benefits cost.

Response:

Please refer to the table below, which identifies employees who have separated from the Company since December 31, 2025.

Table: Employees Separated Since December 31, 2025			
Line No.	Description	Columbia	NCSC
1	Active	5	140
2	Interns	0	9
3	No Allocation to Columbia	0	10
4	Hired Post Dec 2025 & Since Separated	0	11
5	Inactive / On Leave	0	9
6	Total	5	179

In addition, please refer to CONFIDENTIAL_2026-00099_PSC_Staff_DR_Set_3_No_24_Attachment_A and B for listings of the active employees who have separated from the Company since December 31, 2025, for Columbia Gas of Kentucky and NiSource Corporate Service Company, respectively. As reflected in my testimony on page 18, Adjustment 2 for Columbia and page 20, Adjustment 9.3 for NCSC, the Company included only active employees and employees anticipated to be hired prior to the effective date of new rates in the development of its revenue requirement request. For clarity, while these are recently separated positions since December 31, 2025, the majority of these positions have been replaced, are in the process of being replaced, or are expected to be replaced.

ATTACHMENTS
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PURSUANT TO A
MOTION FOR
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TREATMENT

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ATTACHMENTS
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COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), WPD-2.7.L, page 191. Provide the source data and assumptions for the 1.302 percent property tax expense effective rate. Include all workpapers and calculations used to derive that rate in native, executable format with formulas and links intact.

Response:

The 1.302 percent property tax expense effective rate is based on the most recent known assessed value and total billed property tax from 2024. Columbia paid tax of \$5,845,292 million on an assessed value of \$448,923,466. $\$5,845,292 \div \$448,923,466 = 1.302$ percent; no accompanying workpapers had been prepared. See attached 2026-00099_PSC_Staff_DR_Set_3_No_25_Attachment_A for 2024 tax year assessment.

ATTACHMENT A

COMMONWEALTH OF KENTUCKY
DEPARTMENT OF REVENUE
OFFICE OF PROPERTY VALUATION
PUBLIC SERVICE BRANCH
STATION 32 4TH FL, 501 HIGH STREET
FRANKFORT, KY 40601-2103
Phone Fax (502) 564-8192

NOTICE OF ASSESSMENT

COLUMBIA GAS OF KENTUCKY INC
290 W NATIONWIDE BLVD
COLUMBUS, OH 43215-0000

GNC: 005525
TYPE CO: GU
TAX TYPE: 035
TAX ID: 550139565

This Notice of Assessment will become final on 06/09/2025, 60 days from the notice date. A corresponding Notice of Tax Due is being sent from the Compliance and Accounts Receivable System based on the Total Assessment shown below. The Notice of Tax Due will provide the state tax liability, any applicable interest and/or filing penalties that may be assessed. Local taxes will be billed separately by the local taxing jurisdictions where your property is located.

If you protest this assessment, see enclosed 61F009 Notification-Protesting your Assessment. You must submit a written protest in accordance with KRS 131.110; and as required by KRS 132.825(10) and KRS 136.180(2), your protest must specify the valuation you claim to be true. Your written protest stating your claimed value and your payment of tax for your claimed value must be submitted to the Department of Revenue on or before 06/09/2025 or no further remedies will be available regarding this assessment per KRS 134.590. Submit your protest and payment to: ATTN: Public Service Branch, Division of State Valuation, KENTUCKY DEPARTMENT OF REVENUE, Sta. 32, 4th Floor, 501 High Street, Frankfort, KY 40601-2103. You may contact the Public Service Branch at Phone (502) 564-8175 and Fax (502) 564-8192.

NOTICE DATE: 04/10/2025 TAX YEAR: 2024 (For Year Ending December 31, 2023)

PROPERTY CLASS	TAX RATE Per \$100	ASSESSED VALUE	STATE TAX DUE
Subject to State and Local Tax			
Real Estate	0.109	\$393,647,608.11	\$429,075.89
**Tangible Personal Property	0.45	\$55,275,858.24	\$248,741.36
Business Inventory	0.05	\$0.00	\$0.00
Inventory In Transit	0.00	\$0.00	\$0.00
Subject to State Tax Only			
Foreign Trade Zone Property	0.00	\$0.00	\$0.00
Recycling Equipment	0.45	\$0.00	\$0.00
Manufacturing Machinery	0.15	\$0.00	\$0.00
Pollution Control Equipment	0.15	\$0.00	\$0.00
Business Inventory (MM)	0.05	\$0.00	\$0.00
IRB Property	0.015	\$0.00	\$0.00
IRB Property Nontaxable	0.00	\$0.00	\$0.00
TOTALS		\$448,923,466.35	\$677,817.25

** Excludes Motor Vehicles \$0.00

A 10% penalty is charged for late filed returns per KRS 132.290(3). A 20% penalty is charged for omitted property per KRS 132.290(4). Applicable interest will be applied when late or omitted.

KY PSC Case No. 2026-00099
Response to Staff's Data Request Set Three No. 26
Respondent: Gunnar J. Gode

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a) Schedule E-1.1, page 193, Sheet 1. Provide a version of the schedule with line references in column "REFERENCE" corrected.

Response:

The line references have been corrected as set forth in 2026-00099_PSC_Staff_DR_Set_3_No_26_Attachment_A.

**ATTACHMENT
IS AN EXCEL
SPREADSHEET
AND UPLOADED
SEPARATELY**

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), Schedule E-1.1, page 194, sheet 2. Explain whether the SMRP Book/Tax Basis Difference – Adjustment shown on line No. 38 is specific to 2023 and 2023 SMRP investment. If not, provide the amount of book to tax basis difference attributable to 2023-24 SMRP investment separately from 2025-26 SMRP investment.

Response:

Yes, this is the book to tax basis difference specific to the 2023 SMRP investment.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), Schedule E-1.1, page 195, Sheet 3. Explain the basis for the adjustments to the amortization of excess ADIT shown on lines 4 and 11 and the adjustments to the flow through of excess book/tax depreciation shown on lines 3 and 12. Provide any supporting workpapers, assumptions, and inputs to the calculations in native, executable format with formulas and links intact.

Response:

The adjustments shown on lines 4 and 11 in column 4 on Schedule E-1.1, page 195, Sheet 3 simply represent the difference between the projected excess ADIT amortization for the base period shown in column 3 and the projected excess ADIT amortization for the forecasted test period shown in Column 5. The Federal excess ADIT represents the impact on certain property and non-property deferreds as a result of the Tax Cuts and Jobs Act reducing the corporate tax rate to a flat rate of 21%, while the state excess ADIT represents the impact on certain property and non-property deferred tax balances as a result of Kentucky House Bill 487 reducing the Kentucky corporate tax rate to 5%. Prior to the tax rate decreases, taxes were previously collected from customers at a higher rate than what they will eventually be paid. The excess ADIT is then amortized over time as effect of the

new lower tax rate is returned to customers. The amount for the projected Federal excess ADIT amortization for the forecasted test period related to property is calculated in the tax fixed asset software PowerTax. PowerTax keeps the records of the Company's fixed assets and the associated accumulated and deferred tax amounts. The 2027 Property EDIT and FT tab within attached 2026-00099_PSC_Staff_DR_Set_3_No_28_Attachment_A depicts a report from PowerTax detailing the projected ADIT and flow through activity for the forecasted tax period. In this PowerTax report, column I represents the excess ADIT activity for the forecasted period, while the individual rows represent the various property related deferred tax balances. The projected total Federal excess ADIT amortization related to property is shown in cell I43 of the report.

The Non-Property components of Federal excess ADIT and both the property and non-property components of state excess ADIT are amortized on a straight-line basis and maintained outside of PowerTax. The table depicted within the 2027 Total EDIT and FT tab show the amounts that feed into the totals on Schedule E-1.1. This table provides the basis for amortization and calculates yearly activity for each federal non-property component and each state component in rows 18-23. Rows 6-11 summarizes the excess ADIT activity for Property and each component of Non-Property for the forecasted test period. In addition, the total Federal excess ADIT amortization is reduced by the amount of state excess ADIT amortization multiplied by the federal 21% corporate tax rate because federal taxable income already includes a deduction for state income taxes.

Netting the Federal excess ADIT amortization with the federal benefit of the state excess ADIT amortization ensures that there is no double-counting for the state excess ADIT amortization. The amount in cell C14 represents the total projected Federal excess ADIT amortization for the forecasted test period net of the federal benefit of state and ties to the amount listed in schedule E-1.1, sheet 3, line 4, column 5. The amount in cell E12 represents the projected state excess ADIT amortization for the forecasted test period and ties to the amount listed in schedule E-1.1, sheet 3, line 11, column 5. The “Summary of Base Period Return at Current Rates Adjustment” table on the 2027 Total EDIT and FT tab calculates the difference between the base period and forecasted test period excess ADIT activity for federal in cell C35 and state in cell D35, which tie respectively to the amounts on lines 4 and 11 of Schedule E-1.1, sheet 3, column 4.

The adjustments shown on lines 3 and 12 represent the change in projected flow through depreciation activity for the base period vs the projected flow through depreciation activity for the forecasted test period. The federal excess flow through depreciation reflects the federal tax benefits on tax depreciation related to the Tax Cuts and Jobs Act reducing the corporate tax rate to a flat rate of 21% that is immediately passed onto customers, while the state excess flow through depreciation represents state tax benefits on depreciation related to Kentucky House Bill 487 reducing the Kentucky corporate tax rate to 5%. Both the federal and state flow through activity is calculated in the tax fixed asset software PowerTax. In the PowerTax report depicted on the 2027 Property EDIT

and FT tab within the attached 2026-00099_PSC_Staff_DR_Set_3_No_28_Attachment_A, the flow through amounts for each property basis adjustment can be found in column H. The Federal flow through of excess depreciation is shown in cell H43, while the state flow through or excess depreciation is shown in cell H80. These flow through amounts are presented again on the “2027 Forecasted Test Period Flow Through” table on the 2027 Total EDIT and FT tab in row 27. In addition, the total Federal flow through activity is reduced by the amount of state flow through activity multiplied by the Federal 21% corporate tax rate because Federal taxable income already includes a deduction for state income taxes. Netting the Federal excess flow through activity with the Federal benefit of the state flow through activity ensures that there is no double-counting for the state flow through activity. The Federal flow through activity for the forecasted test period net of the Federal benefit of state is calculated cell C29 of the table and ties to schedule E-1.1, sheet 3, line 3, column 5. The projected state flow activity for the forecasted test period is shown in cell E27 and ties to schedule E-1.1, sheet 3, line 12, column 5. The “Summary of Base Period Return at Current Rates Adjustment” table on the 2027 Total EDIT and FT tab calculates the difference between the base period and forecasted test period excess depreciation flow through activity for Federal in cell E35 and state in cell F35, which tie respectively to the amounts on lines 3 and 12 of Schedule E-1.1, sheet 3, column 4.

**ATTACHMENT
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SPREADSHEET
AND UPLOADED
SEPARATELY**

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), Schedule F-8.A, page 220, Sheet 1.

Explain the drivers for the forecast increase in employee expenses from \$1,041,527 in the base period to \$1,228,918 in the forecasted period shown on line 6.

Response:

The \$1,228,918 reflects the unadjusted forecasted test period ("FTP"); whereas, the adjusted FTP (what the Company is seeking in this case), of \$1,084,858 (as explained further below), is more comparable to the BP of \$1,041,527. Columbia confirms its unadjusted budget for the FTP is \$1,228,918 reflects the total company unadjusted FTP employee expenses budget for Columbia and NiSource Corporate Services Company "NCSC" billed to Columbia. It is important to note; however, as described in the testimony of Columbia Witness Davis (specifically, Schedule D-2.7, Adjustments 8.1, 8.2, 9.1 and 9.2 and workpapers WPD-2.7.H (Columbia) and WPD-2.7.I (NCSC billed to Columbia)) and in Columbia's response to Staff's Data Request Set Two No. 8, a proxy level of non-recoverable costs have been removed from the unadjusted FTP resulting in an adjusted forecasted test period expense of \$1,084,858.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), Schedule F-9, page 223, Sheet 1. Provide the basis for the \$380,000 in customer notification expense shown on line 3 including all assumptions, calculations and inputs in native executable format with formulas and links intact.

Response:

The customer notification expense is a line item that is included as one part of the total expected rate case expense based on past experience. Specifically, this is the same value for customer notices that Columbia has used for its past three rate cases. Actual rate case expense, including expenses related to customer notification, is provided in updates to Columbia's Supplemental Response to Commission Staff's First Request for Information, Item 14.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 72, 807 KAR 5:001 Section 16-(8)(a), Schedule I-3, page 235, Sheet 1. Explain the basis for the forecasted decrease in sales customers from 127,220 in 2025 to 124,621 for the unadjusted base period ending 8/31/26 shown on line No. 14. Explain why Columbia Kentucky believes the total number of sales customers will be approximately flat from calendar year 2025 through calendar year 2027.

Response:

The forecasted decrease in sales customers from 127,220 in 2025 to 124,621 for the unadjusted base period ending 8/31/26 shown on line No. 14, is due to the fact that the 127,220 sales customers reflect the year-end total as of December 31, 2025, while the 124,621 sales customers reflect the projected total as of August 31, 2026, the end of the Base Period. Customer counts fluctuate throughout the year and are typically lower in the summer due to occurrences such as non-payment shutoffs and higher in the winter when customers are more likely to restore service for heating needs.

Regarding why Columbia Kentucky believes the total number of sales customers will be approximately flat from calendar year 2025 through calendar year 2027, this is primarily explained by the following:

- Residential: the forecast is approximately flat because the residential customer count model is tied to population data which shows slow growth of 0.48%, 0.13%, and 0.06% in 2025, 2026, and 2027, respectively.
- Commercial: the forecast is approximately flat because Columbia of Kentucky has seen actual growth slowing down in the past several years.
- Industrial: actual customer counts have varied 1-2 customers per year since 2022. There are no indications that customer count will change throughout the forecast horizon.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Tab 84, 807 KAR 5:001 Section 16-(8)(m), Schedule M, page 1 and 2. Describe the factors that result in a forecasted decrease in total revenue excluding gas cost shown on line 12 from 144,744,446 in the base period to 135,278,504 shown in the forecast period.

Response:

The decrease in total revenue from the base period to the forecasted test period is primarily due to ratemaking adjustments that remove certain base-period items from the forecasted test period. These items include unbilled revenue, off-system sales, and SMRP-related entries used to align SMRP billed revenue with earned revenue under the alternative revenue program. Please also refer to the responses to PSC Staff DR Set 2 No. 9 and PSC Staff DR Set 3 No. 5.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to the Direct Testimony of Elizabeth J. Owens, page 28, line 3. Provide the total requested Long-Term Incentive expense in the test year revenue requirement broken down by restricted stock units (RSU) and performance stock units (PSU) components.

Response:

Please see the table below for the identification and quantification of Long-Term Incentive Compensation ("LTI") O&M Expense for the adjusted (pro forma) Forecasted Test Period ("FTP").

<u>FTP Long-Term Incentive Compensation</u>	<u>Total</u>
Columbia – RSUs	\$408,722
Columbia – PSUs	\$446,990
Columbia – Other	<u>\$8,956</u>
Total Columbia LTI	\$864,668
NCSC Billed / Budgeted to Columbia – RSUs	\$539,481
NCSC Billed / Budgeted to Columbia – PSUs	\$893,050
NCSC Billed / Budgeted to Columbia – Other	<u>\$14,379</u>
Total NCSC Billed / Budgeted to Columbia LTI	\$1,446,909
Total FTP	\$2,311,577

KY PSC Case No. 2026-00099
Response to Staff's Data Request Set Three No. 34
Respondent: George B. Jonda

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff's Second Request, Item 29. Provide the derivation of the Basis 1-20 allocation percentages for 2023, 2024, and 2025. Provide the source for each input to the calculation and provide that calculation in native executable format with formulas and links intact.

Response:

Please see CONFIDENTIAL_2026-00099_PSC_Staff_DR_Set_3_No_34_Attachment_A.

ATTACHMENTS
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CONFIDENTIAL
TREATMENT

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Refer to Columbia Kentucky's response to Staff Second Request, Item 29, Attachment A.

Describe the difference between the "Direct Billed", "Basis 20" and "Direct NCSC" basis for allocating costs to Columbia Kentucky.

Response:

"Direct Billed" costs are ones where the Columbia specific Billing Pool (0032) is used and where Columbia is the sole recipient and beneficiary of the expense and activity being performed.

"Basis 20" includes services that are provided to all NiSource affiliates. All affiliates would benefit from and receive an allocation of costs for these services. Allocation percentages to the affiliates is predetermined based on the relation of Service Corporation billing costs in total.

"Direct NCSC" are expenses that are allocated first to NCSC, and then in accordance with Article 3.3 and 3.5 of the Service Agreement are billed to affiliates each month based on the affiliate's proportion of the total Service Corporation billing costs for that month.

Exhibit A of Attachment GBJ-2 – 16-(7)(a) provides further details about Direct Billing and the Bases of allocation.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S THIRD REQUEST FOR INFORMATION
DATED JULY 17, 2026

Explain what factors caused allocated O&M costs to increase from a total of 20,998,813 in 2023 to 25,605,083 in 2024. Describe why that elevated level of O&M expense continued in 2025 and is forecasted to be required going forward.

Response:

As further explained on page 12 of the Direct Testimony of Elizabeth N. Davis (including Table END-1), the increase in total O&M costs (direct incurred charges or billed to Columbia by NCSC), must be viewed in relation to the surrounding years, which reflects a total historical inflation comparison including 2023 and 2024. The increase in NiSource Corporate Services Company ("NCSC") O&M expenses billed to Columbia in 2024 compared to 2023 reflects a combination of filling open positions (such as customer care centers, IT, and fleet, which are necessary to provide safe and reliable service), higher employee benefit costs, ongoing technology needs, and broader inflationary pressures across the business. For instance, employee insurance costs are generally expected to increase from year to year due to the continued rise in the cost of medical services and prescription drugs, provider reimbursement rates, and the utilization of services by covered employees and dependents. These increases are also affected by broader health

care inflation, changes in the mix and severity of claims, and the introduction of new or higher-cost treatments and medications. As a result, even when plan design and covered populations remain relatively stable, the underlying cost of providing employee insurance benefits typically trends upward over time. Additionally, some of the increase in NCSC O&M billed to Columbia is associated with the shifting of some costs directly incurred by Columbia compared to costs billed to Columbia by NCSC. As such, this analysis should be viewed in total rather than in isolation. Also, the increased O&M expense in 2025 can be attributed to the property tax entry as further explained in the Company's response to Attorney General Data Request 2-19. Moreover, while these factors have contributed to an increase in costs, Columbia remains focused on identifying efficiencies to offset inflationary pressures wherever possible. These efforts have helped to limit O&M expense growth from 2024 through the Unadjusted 2027 Forecasted Test Period while maintaining the resources needed to provide safe and reliable service to customers.