

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

In the matter of:	)	
	)	
ELECTRONIC APPLICATION OF	)	Case No. 2026-00129
COLUMBIA GAS OF KENTUCKY, INC.	)	
FOR A DECLARATORY ORDER OR IN	)	
THE ALTERNATIVE A CERTIFICATE OF	)	
PUBLIC CONVENIENCE AND	)	
NECESSITY AUTHORIZING THE	)	
INSTALLATION OF NEW CUSTOMER	)	
SERVICE SOFTWARE SYSTEM	)	
UPGRADES	)	

**COLUMBIA GAS OF KENTUCKY, INC.'S VERIFIED RESPONSES TO
STAFF'S FIRST SET OF DATA REQUESTS
DATED JUNE 29, 2026**

Comes now Columbia Gas of Kentucky, Inc. ("Columbia" or "Company"), by
counsel, and does hereby tender its Verified Responses to Commission Staff's First Set of
Data Request dated June 29, 2026.

Filed: July 10, 2026

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SERVICE SOFTWARE SYSTEM	)	
UPGRADES	)	

VERIFICATION OF JUDY COOPER

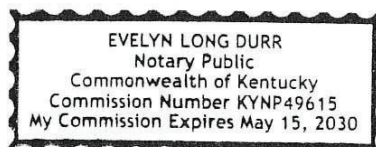
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF FAYETTE)

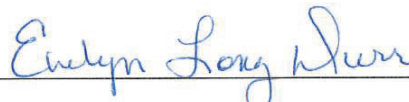
Judy Cooper, Director of Regulatory Affairs for Columbia Gas of Kentucky, Inc., being duly sworn, states that she has drafted and/or supervised the preparation of responses to certain requests for information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.



Judy Cooper

The foregoing Verification was signed, acknowledged and sworn to before me this 9th day of July 2026, by Judy Cooper.





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

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

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PUBLIC CONVENIENCE AND	)	
NECESSITY AUTHORIZING THE	)	
INSTALLATION OF NEW CUSTOMER	)	
SERVICE SOFTWARE SYSTEM	)	
UPGRADES	)	

VERIFICATION OF SHANNON BANKS-BROOKS

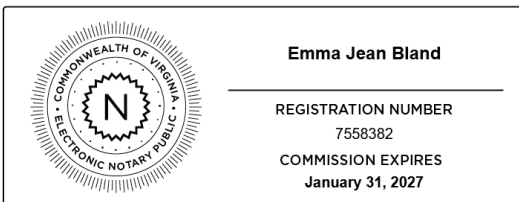
STATE OF Commonwealth of Virginia)
)
COUNTY OF Prince William)

Shannon Banks-Brooks, Senior Director Customer Transformation for NiSource Corporate Services Corporation, 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.

Shannon Banks-Brooks

Shannon Banks-Brooks

The foregoing Verification was signed, acknowledged and sworn to before me this 9th day of July 2026, by Shannon Banks-Brooks.



Emma Jean Bland

Notary Commission No. 7558382

Commission expiration: 01/31/2027

Electronic Notary Public

Notarized remotely online using communication technology via Proof.

**COMMONWEALTH OF KENTUCKY
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UPGRADES	)	

VERIFICATION OF KEVIN JOHANNSEN

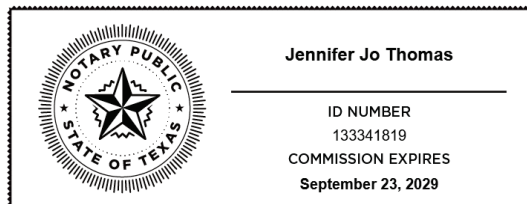
STATE OF Texas)
)
COUNTY OF Travis)

Kevin Johannsen, Vice President, Digital Transformation for NiSource Corporate Services Corporation, 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.

Kevin Johannsen

Kevin Johannsen

The foregoing Verification was signed, acknowledged and sworn to before me this 9th day of July 2026, by Kevin Johannsen.



Jennifer Jo Thomas

Notary Commission No. 133341819

Commission expiration: 09/23/2029

Electronically signed and notarized online using the Proof platform.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to the Application, generally. Confirm that Columbia Kentucky completed a cost-benefit analysis comparing the selected vendors for its various Information Technology (IT) system upgrades to alternative solutions that Columbia Kentucky considered in the process of selecting vendors. If confirmed, provide the cost-benefit analysis. If the answer is anything but confirmed, explain why Columbia Kentucky did not complete a cost-benefit analysis in this proceeding.

Response:

As explained on pages 21-24 of the Direct Testimony of Company Witness Johannsen, the Company first conducted an evaluation of potential alternatives to address the obsolete and aging existing Information Technology ("IT") infrastructure, which resulted in the most effective solution being replacement with a cloud-based platform. The Company performed a detailed RFP process to select vendors to implement the various cloud-based IT system upgrades that would serve as that replacement. This RFP process included an analysis evaluating the costs, benefits, and capabilities of the various vendors that provided responses to the RFP. The Company was assisted in this endeavor by a third-

party evaluator. The comprehensive vendor comparison led to the selection of the providers that are contained in the documentation set forth in Attachments KJ-3 and KJ-4 to the Direct Testimony of Company Witness Johannsen.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to Application, page 4. Provide a table of the assets that will be replaced, including the original useful life; current depreciated value; and the date the asset either was or will be fully depreciated.

Response:

The table below accounts for all the assets identified to be retired as part of the IT systems upgrades that had a net plant balance as of 12/31/2024. There are numerous other assets that will be replaced that were fully depreciated before 12/31/2024 and were not contained on this list because of their vintage and the fact that they have been fully depreciated for a number of years, some even for over a decade. These include systems such as, for example, the Distributed Information System, Gas Transportation System, and Gas Measurement Billing.

<u>Description</u>	<u>Plant Balance</u>	<u>Initial Life (Months)</u>	<u>Remaining Post Life as of 12/31/2026</u>	<u>Net Plant Balance 12/31/2026</u>	<u>Retirement Month</u>
<u>Intangible Plant - Misc. Software</u>					
Automation of Regulatory - Billing	\$ 9,226	60	-	\$ -	01-2025
Printing - Bar Code Changes Capital	\$ 883	60	-	\$ -	01-2025
DIS Online&Memo Enhancements Bundle	\$ 23,459	60	-	\$ -	02-2025
Component Level Detail DIS, GMB-TCS	\$ 417	60	-	\$ -	02-2025
Regulatory: Update Choice Rates DIS	\$ 4,153	60	-	\$ -	03-2025
DIS Customer List Enhancements	\$ 17,896	60	-	\$ -	05-2025
DIS Address Standardization Needs	\$ 15,712	60	-	\$ -	05-2025
Upgrade Oracle 19C	\$ 1,336	60	-	\$ -	05-2025
New Cust Payment Service Providers	\$ 1,559	60	-	\$ -	07-2025
GMB Final Bill indicator	\$ 904	60	-	\$ -	07-2025
Cust New Business-Multi Site PSID	\$ 1,712	60	-	\$ -	08-2025
Regulatory: Update PGA Rates DIS	\$ 3,177	60	-	\$ -	10-2025
HMB 2020 DIS Enhancement Work	\$ 20,435	60	-	\$ -	01-2026
Paperless Billing Ph 2 DIS	\$ 4,008	60	-	\$ -	10-2026
Paperless Billing Ph 1 DIS	\$ 1,441	60	-	\$ -	10-2026
2023 DIS E-Channels Agile Product Team	\$ 7,658	60	10.5	\$ 1,340	11-2027
Expand Tax Array for all DIS states	\$ 69,221	60	10.5	\$ 12,114	11-2027
2022 DIS E-Channels Agile Product Team	\$ 8,367	60	11.5	\$ 1,626	12-2027
Paperless Phase 2: Opt Out of Paper Invoicing in the GTS System	\$ 7,861	60	29.5	\$ 3,865	07-2029
<u>Total</u>				<u>\$ 18,945</u>	

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to Application, pages 12–13.

a. Explain how the allocation from NiSource to Columbia Kentucky was calculated.

Include any supporting workpapers.

b. Provide the allocations to each other NiSource affiliate.

Response:

a and b:

The costs are allocated using NiSource Corporate Service Company's allocation methodologies approved by FERC and utilized for shared service activities. When preparing the cost estimates for the customer software system upgrades, the costs were allocated based upon the number of customers served by each operating company, which reflects expected utilization and benefits received from the upgraded systems. To the extent certain costs are incurred exclusively for a particular operating company, if feasible, those costs will be directly charged to the applicable NiSource operating

company. However, it is anticipated that the majority of costs for the various IT system upgrades will be charged to Columbia on an allocated basis.

Please see the 2026-00129_PSC_Staff_DR_Set_1_No.3_Attachment_A for a calculation of how the customer IT infrastructure upgrades will be allocated to the various different operating companies of NiSource. NiSource has other unregulated affiliates that do not have retail customers and are therefore not allocated any of the Customer IT Upgrade costs because they will not use any of these systems.

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

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to the Direct Testimony of Kevin Johannsen (Johannsen Direct Testimony), page 12, lines 9–11. Expand on how common design reduces complexity, eliminates duplication, and enables unified customer experience across digital channels, contact centers, and customer operations.

Response:

Common Design refers to the development of standardized customer processes, business rules, system configurations, and customer interaction models across participating NiSource operating companies.

Common Design reduces complexity by eliminating the need to create, maintain, and support unique solutions for each operating company. Rather than supporting multiple versions of customer processes and system functionality, the Customer System Upgrades program establishes a single design framework that can be consistently implemented across customer information systems, digital channels, contact center technology, and customer-facing operations.

Common Design eliminates duplication because business requirements, integrations, testing activities, training materials, and system enhancements can be developed once and leveraged across multiple operating companies.

Common Design also supports a more unified customer experience by providing consistent customer journeys, communication preferences, self-service capabilities, contact center interactions, and account management capabilities regardless of channel. Customers will be able to experience more consistent service whether interacting through digital platforms, customer service representatives, or other customer support channels.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to the Johannsen Direct Testimony, page 18, lines 5–6. Provide the percentage of Columbia Kentucky's current IT system(s) that are currently at the end of its service life as of the date of this request.

Response:

As discussed in the Application and testimony, multiple components of Columbia Kentucky's existing customer technology environment have already reached or are approaching end-of-life or end-of-support status.

As part of ongoing management of the IT infrastructure, the Company assesses and reviews the risk of obsolescence and whether IT solutions will no longer be supported. Based upon the most recent assessment, conducted in 2025, as of 2026 Columbia Kentucky estimates that approximately 70% of the customer technology environment supporting customer information, customer engagement, billing, contact center, and related functions is at or approaching end-of-life/end-of-support status

and/or obsolete. Based on that same analysis, by 2029, approximately 81% of Customer IT Systems will be end-of-life/end-of-support and/or obsolete.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to the Direct Testimony of Shannon Banks-Brooks (Banks-Brooks Direct Testimony), page 5, lines 8 - 13. Confirm that Columbia Kentucky has quantified the cost savings associated with the projected increased efficiencies. If the answer is confirmed, provide the quantifiable cost savings that Columbia Kentucky will experience as a result of the proposed project. If the answer is anything but confirmed, provide an explanation as to how the improved efficiencies of upgrading Columbia Kentucky's IT system will reduce costs in the future.

Response:

The Company has not developed a specific quantified estimate of operational cost savings from the proposed Customer Service IT Upgrades. The primary objective of the Customer System Upgrades is replacement of aging, fragmented, and obsolete systems that present operational, cybersecurity, customer service, and business continuity risks.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to the Banks-Brooks Direct Testimony, page 8, lines 5–6. Consider this an ongoing request. Confirm that the comprehensive customer communication strategy will be completed throughout the pendency of this case. If confirmed, once available, provide the comprehensive customer communication strategy. If not confirmed, explain the response.

Response:

The corresponding customer communication strategy is being developed in advance of the deployment of each software system, which is not anticipated to be completed before August 1, 2026.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to Application, page 7. Explain how Columbia Kentucky plans to recover the costs associated with the IT upgrades.

Response:

Columbia expects to seek recovery for costs associated with the Customer System Upgrades in rate cases that correlate with the timeframe of the costs being incurred or the assets being used and useful. Rates would be updated upon Commission Order granting recovery.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to Application, page 5. Provide a copy of the letter NiSource received from one of its current software vendors stating that it will no longer be providing support of one of the existing technology systems.

Response:

Please refer to 2026-000129_PSC_Staff_DR_Set_1_No_9_Attachment_A for a copy of the letter NiSource Corporate Services Company received from one of its current software vendors.

ATTACHMENT A

October 28, 2025

NiSource Corporate Services Company
Attn: Michelle Tisher
mtisher@nsource.com

Re: Nonrenewal of Maintenance Services

Dear Ms. Tisher,

Genesys Cloud Services, Inc. ("Genesys"), formerly Genesys Telecommunications, Inc. and NiSource Corporate Services Company and its entities and/or respective Affiliates ("NiSource"), entered into a Master Software License and Services Agreement on or about August 3, 2016. Under that Agreement, NiSource purchased software licenses and continued to purchase associated maintenance and support for such licenses.

Pursuant to the terms of that Agreement, this letter is to inform NiSource of that Genesys will no longer be providing maintenance and support services and will not be renewing such services upon expiration of the current annual maintenance term, or on December 31, 2025. This includes the cessation of all services currently provided under Genesys' maintenance and support performance obligations, such as security updates, error resolution, and access to Genesys support personnel for issue management.

Genesys is available to discuss options, including transitioning NiSource to the Genesys Cloud service, under terms mutually agreeable to both parties. Genesys values its continued partnership with NiSource and appreciates its collaboration during this transition.

You can discuss such options with 

Thank you for your immediate attention to this matter and we look forward to serving you further.

Sincerely,

Genesys Cloud Services, Inc.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Confirm that Columbia Kentucky's existing IT systems will remain operational until the new IT systems are implemented. If not confirmed, explain the response.

Response:

The Company has planned a phased transition approach whereby legacy systems remain available until deployment, as shown in Attachment KJ-2 in the Direct Testimony of company Witness Johannsen, which commences with an August 1, 2026, build date.

COLUMBIA GAS OF KENTUCKY, INC.
RESPONSE TO STAFF'S FIRST REQUEST FOR INFORMATION
DATED JUNE 29, 2026

Refer to the Application, page 14–15. Confirm that there will be an annual \$5.7 million increase to operating and maintenance expense, relative to the current IT expense, for this IT upgrade. If not confirmed, explain the response.

Response:

No. The approximately \$5.7 million amount referenced on pages 14-15 of the Application does not represent an annual increase in operating and maintenance expense relative to current customer technology operating costs; rather, it consists of the estimated annual ongoing IT expense for the various IT systems that are in place, as explained on page 26 of Company witness Johannsen's Direct Testimony.