

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:)
)
ADJUSTMENT OF RATES OF COLUMBIA)
GAS OF KENTUCKY, INC.)
_____)

CASE NO. 2009-00141

**MOVANT FOR INTERVENTION AARP'S FIRST SET OF REQUESTS TO
COLUMBIA GAS OF KENTUCKY, INC. FOR INFORMATION**

Pursuant to the scheduling order adopted by the Commission in this case, Movant for Intervention AARP requests that Columbia Gas of Kentucky, Inc. file with the Commission the following information, with a copy to all parties of record, within the time specified in the Commission's Order. For each response to request for information,

- (1) Please identify the individual responsible for answering each request;
- (2) These requests shall be deemed continuing so as to require further and supplemental responses if Columbia Gas of Kentucky receives or generates additional information within the scope of these requests between the time of the response and the time of the hearing;
- (3) A request to identify a document means to state the date or dates, author or originator, the subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian;

(4) To the extent that the specific document, study or information requested does not exist, but a similar document, study or information does exist, please provide the similar document, study or information;

(5) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout;

(6) If Columbia Gas of Kentucky objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify AARP's Attorney of Record as soon as possible;

(7) For any document withheld on the basis of privilege, state the following: date; author; addressee; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted;

(8) In the event any document called for has been destroyed or transferred beyond the control of the company, please state the identity of the person by whom it was destroyed or transferred; the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy; and

(9) Where the information requested is the same as has been provided to another party in response to a request for information, it is sufficient to identify that response rather than duplicating the information requested.

Request For Information 1

Please provide the earned rate of return, and the return allowed in the most recent rate case, for each period shown on Exhibit MPB-9.

Request For Information 2

(a) Please provide the cross-price-elasticity of natural gas for each class of Columbia Gas of Kentucky customers, versus electricity.

(b) If such elasticities are available only for a larger set of customers (e.g. all Columbia Gas customers, all natural gas customers in various regions of the United States, etc.), please provide the elasticities most applicable to the customers of Columbia Gas of Kentucky.

(c) If such elasticities have changed over the last 10 years, please explain the changes.

(d) To the extent possible, please break out such elasticities for the residential class by the income levels of the customers (e.g. under 50% of federal poverty guidelines, under 100%, under 125%, under 150%, under 200%, or percentages of median income, or some similar yardstick).

Request For Information 3

Please provide the average usage per gas-using appliance (e.g. furnace, space heater, refrigerator) for each of the last 10 years. To the extent available, please break out customers' average usage per gas-consuming appliance by income, age, and disability of the customer.

Request For Information 4

Please provide the average usage per customer and the annual total usage for each class for the last 10 years.

Request For Information 5

(a) Please provide the chart on p. 6 of Ms. Efland's testimony, using only the data points 2006, 2007, 2008 and 2009.

(b) Please provide the chart on p. 6 of Ms. Efland's testimony, using the historical data for 2006, 2007, 2008 and 2009, and the company's forecast residential annual volume per customer, Columbia Gas Kentucky, normalized for weather, for each of the next 5 years. Please provide copies of all forecasts of such volumes per customer for the next 5 years.

Request For Information 6

Please provide all studies, memoranda, data or other material on which Ms. Efland bases her conclusion on p. 7 that "the downward trend in consumption per customer will continue."

Request For Information 7

Please identify any proposed gas-using appliance efficiency or usage standards or building envelop construction or building standards that are presently being considered for adoption by any Kentucky state agency or the Kentucky state legislature, or by any Federal agency or the United States Congress.

Request For Information 8

Please identify all gas-using appliance efficiency or usage standards, including building envelope construction or building standards, federal or state, that are presently in effect for customers of Columbia Gas of Kentucky.

Request For Information 9

Please provide any studies or other written material discussing the impact of a straight-fixed-variable rate upon gas consumption patterns.

Request For Information 10

Please provide any studies or other written material discussing the technical potential for gas energy efficiency among the Company's customers or gas customers similarly situated.

Request For Information 11

Please provide any studies or other written materials discussing the economic potential for gas energy efficiency among the Company's customers or gas customers similarly situated.

Request For Information 12

Please provide any studies or other written materials discussing the achievable potential for gas energy efficiency among the Company's gas customers or customers similarly situated.

Request For Information 13

(a) Please provide the results of the California standard cost-benefit tests for each of the DSM programs proposed by the Company.

(b) Please detail how customers will be informed of the proposed DSM offerings.

(c) Please describe the expected participants, by such socio-demographic characteristics as age, home ownership, income, employment, and any others considered pertinent to marketing the program.

(d) Please provide the Company's understanding of the market barriers and imperfections, if any, that prevent its customers from taking advantage of energy efficiency absent the Company's DSM offerings, and explain in detail how each proposed DSM program overcomes any of the identified market barriers or imperfections.

Request For Information 14

Please provide the number of residential customers in arrears in each of the last 36 months, broken out by length of time in arrears, such as 0 – 30 days, 31-60 days, 61-90 days, over 90 days. Please use the time periods used by the company for bill collection and arrearage management purposes. Please break out each group by the number who are low-income, or elderly, and provide your definition of the terms “low-income” and “elderly.” Please break out each group by receipt of LIHEAP in the last 12 months.

Request For Information 15

Please provide the aggregate and average dollar amount of residential customer bills in arrears in each of the last 36 months, broken out by length of time in arrears, such as 0 – 30 days, 31-60 days, 61-90 days, over 90 days. Please use the time periods used by the company for bill collection and arrearage management purposes. Please break out each group by the number who are low-income, or elderly, and provide your definition of the terms “low-income” and “elderly.” Please break out each group by receipt of LIHEAP in the last 12 months.

Request For Information 16

Please provide the number of residential customers in each of the last 36 months who (a) have been sent late notices within the last month (or billing period), (b) have

been sent termination notices within the last month (or billing period), (c) have been terminated from service within the last month (or billing period), (d) have been reconnected in the last month (or billing period), and (e) have paid a reconnection charge in the last month (or billing period). Please provide this information broken out by income, age and LIHEAP receipt in the last 12 months, to the extent possible.

Request For Information 17

Please state the mean, mode, median, maximum and minimum lengths of time residential customers were without power between disconnection for non-payment and reconnection in the last year, broken out by income, age, and LIHEAP receipt in the last 12 months, to the extent possible.

Request For Information 18

Please identify the annual revenue that would have been charged and the average revenue per terminated residential customer that would have been charged, had the customer continued to obtain service during the time of termination, broken out by income, age, and LIHEAP receipt in the last 12 months, to the extent available.

Request For Information 19

Please provide any memoranda, internal policy documents, instructions to employees, statutes or regulations, or any other written material describing and prescribing the company's bill collection policies, covering any of the following topics:

- (a) Effectiveness of preconditions for becoming a customer, including arrearages, credit ratings, prior payment patterns, or the like;
- (b) Effective methods for collecting payments;
- (c) Effectiveness of non-payment notices and notice policies and practices;

(d) Effectiveness of non-payment termination policies, including any minimum amount in arrears for any minimum time, and any other preconditions to termination;

(e) Effectiveness of payment plan policies, including eligibility, and treatment of inability to meet existing payment plan terms;

(f) Effectiveness of winter, summer, extreme weather (defined), customer category (e.g. elderly, defined), or other restraints on termination; and

(g) Effectiveness of fees for non-payment, late-payment, returned checks, or other credit and collection-related fees.

Request For Information 20

With regard to payment plans offered to customers in the last two years, please provide: (a) the average period (in months) for successful plan satisfaction; (b) the average amount of arrearages placed in the payment plan; and (c) the average down payment requested, if any. Please break this information out by income, age, and LIHEAP receipt in the last 12 months.

Request For Information 21

Please provide any information in the possession of the company regarding the elasticity of demand of residential customers, broken out by income, age, and LIHEAP receipt in the last 12 months to the extent available.

Respectfully submitted,



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Counsel for Movant for Intervention
AARP

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies have been tendered this day for filing by hand delivery to the Commission and have been served by first-class mail upon all parties of record and applicants for intervention this 2nd day of June, 2009.

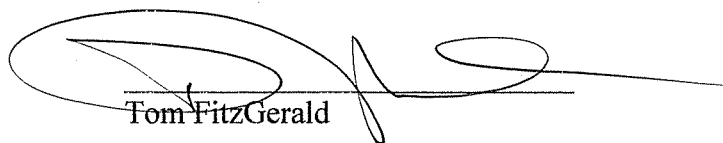
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