

# BATES & SKIDMORE

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JACK B. BATES

IRIS G. SKIDMORE

**Via Hand-Delivery**

June 2, 2009

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

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JUN 02 2009

PUBLIC SERVICE  
COMMISSION

**Re:** Application of Columbia Gas of Kentucky, Inc. for an Adjustment in Rates  
Case No. 2009-00141

Dear Mr. Derouen:

Enclosed for filing in the above styled action is an original and ten copies of the Initial Request for Information on Behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.

Sincerely,



Iris G. Skidmore

c: Parties

Enclosures

RECEIVED

JUN 02 2009

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA	)	
GAS OF KENTUCKY, INC. FOR AN	)	CASE NO. 2009-00141
ADJUSTMENT IN RATES	)	

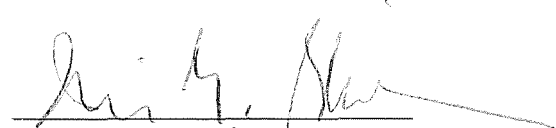
**INITIAL REQUEST FOR INFORMATION ON BEHALF OF CAC**

\* \* \* \* \*

Comes now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and hereby submits the following Initial Request for Information to Columbia Gas of Kentucky, Inc.:

1. How many Columbia Gas residential accounts were shut off for non-payment in each year 2005, 2006, 2007 and 2008?
2. How many Columbia Gas residential accounts were shut off for non-payment in the time period January 1, 2009 through the latest date in 2009 for which records are available?
3. How many Columbia Gas residential accounts received payments from a third-party assistance program or agency (LIHEAP, WinterCare, etc.) in each year 2005, 2006, 2007, 2008, and through the latest date in 2009 for which records are available?
4. What is the total amount of funding Columbia Gas has contributed in each year 2005, 2006, 2007, 2008, and 2009 to programs or organizations that directly assist its customers who have difficulty paying their bills? This response should break down ratepayer vs. shareholder funding.

5. How much have Columbia Gas ratepayers, through voluntary donations given through billing statements, contributed to the WinterCare Energy Fund in each year 2005, 2006, 2007, 2008, and 2009?
6. How many Columbia Gas ratepayers, through voluntary donations given through billing statements, contributed to the WinterCare Energy Fund in each year 2005, 2006, 2007, 2008, and 2009?
7. Please provide a list of Kentucky counties in which Columbia Gas provides service and the number of residential customers in each of those counties.
8. What is the current, average, total monthly cost for all residential customers of Columbia Gas (including all charges)?
9. Based on the requested residential rate increase, what will be the real dollar annual increase for the average Columbia Gas residential customer in Year 1? And in Year 2?
10. Assuming approval of the requested residential rate increase, what will be the estimated average, total monthly cost for residential customers in Year 1? And in Year 2?
11. Please provide the unduplicated number (customers who were late multiple times should be counted only once) of residential accounts which were paid late at any time in 2005, 2006, 2007, 2008 and thus far in 2009.
12. Please provide the number of residential accounts which were assessed a reconnect fee at least one time in 2005, 2006, 2007, 2008, and thus far in 2009.



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COUNSEL FOR CAC

**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2009, a true and accurate copy of the foregoing Initial Request for Information on Behalf of CAC was served by United States mail, postage prepaid, to the following:


Hon. Stephen B. Seiple  
Columbia Gas of Kentucky, Inc.  
200 Civic Center Drive  
P.O. Box 117  
Columbus, OH 43216-0117

Hon. Richard S. Taylor  
225 Capital Avenue  
Frankfort, Kentucky 40601

Hon. Dennis G. Howard II  
Hon. Lawrence W. Cook  
Office of the Attorney General  
1024 Capitol Center Drive, Suite 200  
Frankfort, KY 40601

Hon. David F. Boehm  
Boehm, Kurtz, and Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, Ohio 45202

Hon. William H. May, III  
Hon. Matthew R. Malone  
127 West Main Street  
Lexington, KY 40507



Counsel for CAC