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COVER

FAX

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SHEET

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To: Jeff Derouen - Executive Director  
Fax #: 502.564.3460  
Subject: Case No. 2009-00141  
Date: August 12, 2009  
Pages: 11 pages, including this cover sheet.

COMMENTS:

Attached please find **Columbia Gas of Kentucky's Data Request Served Upon Interstate Gas Supply, Inc.** to be filed with respect to the above-referenced matter.

Thank you.

From the desk of...

Dan Creekmur  
Attorney  
Columbia Gas of Kentucky, Inc.  
200 Civic Center Drive  
Columbus, Ohio 43215  
(614) 460-4680  
Fax: (614) 460-6986



August 12, 2009

**SENT VIA FAX AND  
OVERNIGHT DELIVERY**

Mr. Jeff Derouen  
Executive Director  
Public Service Commission  
Commonwealth of Kentucky  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602

**RE: Case No. 2009-00141**

Dear Mr. Derouen,

Enclosed for filing are Columbia Gas of Kentucky's Data Requests Served Upon Interstate Gas Supply, Inc. One copy is being faxed, and the original and eleven (11) copies are being sent by overnight delivery. Please docket the fax copy, and upon receipt of the overnight delivery please docket the original and ten (10) copies and return the extra copy to me in the self addressed stamped envelope enclosed. Should you have any questions about this filing, please contact me at 614-460-4648. Thank you!

Sincerely,

A handwritten signature in cursive script, appearing to read 'Stephen B. Seiple'.

Stephen B. Seiple  
Assistant General Counsel

Enclosures

cc: All Parties of Record  
Hon. Richard S. Taylor

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

In the Matter of: )  
Application of Columbia Gas of Kentucky, Inc., ) Case No. 2009-00141  
for an Adjustment in Rates. )

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**COLUMBIA GAS OF KENTUCKY, INC.'S  
DATA REQUESTS SERVED UPON  
INTERSTATE GAS SUPPLY, INC.**

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Pursuant to the Commission's Order in this proceeding, dated July 31, 2009, Columbia Gas of Kentucky, Inc. ("Columbia"), propounds the following data requests to be answered by Interstate Gas Supply, Inc. ("IGS") in writing. These data requests shall be deemed to be continuing so as to require supplementary answers between the time the answers are served and the time of hearing.

**INSTRUCTIONS FOR ANSWERING**

(1) All responses shall be in writing, and each response shall identify the name and position of the person(s) who provided the response. Each data request shall be answered separately and fully. Each response shall first restate the data request being answered.

(2) All responses to data requests shall be served upon Columbia at the offices and its attorneys in this proceeding:

Stephen B. Seiple  
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Columbus, Ohio 43216-0117  
Telephone: (614) 460-4648  
Fax: (614) 460-6986  
e-mail: sseiple@nisource.com

Richard S. Taylor  
225 Capital Avenue  
Frankfort, Kentucky 40601  
Telephone: (502) 223-8967  
Fax: (502) 226-6383  
e-mail: attysmitty@aol.com

(3) You are reminded that all answers must be made separately and fully, and that an incomplete or evasive answer is a failure to answer.

(4) You are under a continuing duty to seasonably supplement your response with respect to any question directly addressed to the identity and location of person having knowledge of discoverable matters, the identity of any person expected to be called as an expert witness at hearing, and the subject matter of which he or she is expected to testify, and to correct any response which you know or later learn is incomplete or incorrect.

(5) All information is to be divulged which is in your possession or control or within the possession and control of your attorneys, investigators, agents, employees, or other representatives of you or your attorney.

(6) Where a data request calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable.

(7) Where an objection is interposed to any data request, or part thereof, answer all parts of the data request to the extent not objected to.

(8) Identification. As used herein, the terms "identification," "identify," or "identity," when used in reference to (a) a natural individual, requires you to state his or her full name and residential and business address; (b) a corporation, requires you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the address of all of its offices in Kentucky; (c) a business, requires you to state the full name or style under which the business is conducted, its business address or ad-

dresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a document, requires you to state the number of pages and the nature of the document (*e.g.*, letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location and custodian; (e) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the person participating in the communication and to state the date, manner, place and substance of the communication.

(9) Identification of documents. With respect to each data request, in addition to supplying the information requested, you are to identify all documents that support, refer to, or evidence the subject matter of each data request and your answer thereto.

If any or all documents identified herein are no longer in your possession, custody, or control because of destruction, loss, or any other reason, then do the following with respect to each and every such document: (a) describe the nature of the document (*e.g.*, letter or memorandum); (b) state the date of the document; (c) identify the persons who sent and received the original copy of the document; (d) state in as much detail as possible the contents of the document; and (e) state the manner and date of disposition of the document.

If you contend that you are entitled to withhold from production any or all documents identified herein on the basis of attorney-client privilege, the work product doctrine, or other grounds, then do the following with respect to each and every document: (a) describe the nature of the document (*e.g.*, letter or memorandum); (b) state the date of the document; (c) identify the persons who sent and received the original and a copy of the document; (d) state the subject mat-

ter of the document; and (e) state the basis upon which you contend you are entitled to withhold the document from production.

(10) Representative. As used herein, the term "representative" means any and all agents, employees, servants, officers, directors, attorneys, or other persons acting or purporting to act on behalf of the person in question.

(11) Person. As used herein, the term "person" means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments, and other units therein, and shall include, but not be limited to, a public or private corporation, partnership, joint venture, voluntary or unincorporated association, organization, proprietorship, trust, estate, governmental agency, commission, bureau, or department.

(12) Document. As used herein, the term "document" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram cable, report, record, contract, agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, electronic mail, computer discs or tapes, or computer produced interpretations thereof, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody, or control or which was, but is no longer, in your possession, custody or control.

(13) Communication. As used herein, the term "communication" means any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made,

including, but not limited to, correspondence, conversations, dialogues, discussion, interviews, consultations, agreement, and other understandings between or among two or more persons.

(14) **Contention Data Request.** When a data request requires you to “state the basis of” a particular claim, contention, or allegation, state in your answer the identity of each and every communication and each and every legal theory that you think supports, refers to, or evidences such claim, contention, or allegation.

(15) **The Word “Or.”** As used herein, the word “or” appearing in a data request should not be read so as to eliminate any part of the data request, but, whenever applicable, it should have the same meaning as the word “and.” For example, a data request stating “support or refer” should be read as “support and refer” if an answer that does both can be made.

### DATA REQUESTS

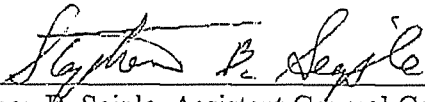
1. On page 3, lines 20 and 21, of Mr. White's testimony, and other places in his testimony, Mr. White refers to "IGS Energy." Is IGS Energy a different business entity that IGS (Interstate Gas Supply, Inc.)? If so, please explain IGS Energy's relationship with IGS.
2. On page 6, line 13, of Mr. White's testimony, Mr. White states that IGS is a commodity supplier in a competitive market. Does IGS offer any services to customers other than the sale of natural gas as a commodity? If so, please describe all of the services offered by IGS other than the sale of natural gas as a commodity.
3. Does IGS have any corporate affiliates?
  - (a) Does IGS maintain an ownership interest in any other business entities?
  - (b) If the answer to either part (a) or part (b) above is yes, please identify each such affiliate or business entity and describe the nature of its business.
4. Please describe IGS's understanding of the differences between Columbia's proposed PPS and NSS unregulated services and IGS's unregulated services?
5. Does IGS file with the Kentucky Public Service Commission the prices it proposes to charge Kentucky customers?
  - a. If the answer is yes, how far in advance of the effective date of the prices does IGS file the prices with the Public Service Commission?
  - b. If the answer is no, why does IGS not file its prices with the Commission?
6. Regarding the Direct Testimony of Mr. White, page 4, lines 19-23. Please explain why IGS believes that Columbia will violate K.R.S. § 278, *et seq.*, and provide "impartial" recommendations of the proposed PPS and NSS services.
7. Regarding the Direct Testimony of Mr. White, page 8, lines 15-19. Please explain IGS's method of predicting the daily, weekly, monthly or annual gas usage of its customers.
8. Please describe IGS's experience with the Columbia Gas of Pennsylvania, Columbia Gas of Virginia, and the NIPSCO CHOICE Programs.
  - a. In which of these programs does IGS participate?
  - b. How long has IGS participated in each program and on what date did IGS begin participating?
  - c. How many customers does IGS have enrolled in each Choice Program?
  - d. How has the existence of a PPS program in each of those states affected IGS's ability to enroll customers in Choice Programs?
  - e. In each of the states referenced earlier in this question, how many customers has IGS enrolled through the Choice Programs in each state since the inception of PPS programs in each state?



- f. In each of the states referenced earlier in this question, how many CHOICE customers has IGS enrolled each year for calendar years 2006, 2007, 2008 and 2009 year to date?
9. Please describe IGS's experience with the Columbia Gas of Pennsylvania, Columbia Gas of Virginia, and the NIPSCO transportation programs, other than CHOICE.
  - a. In which of these programs does IGS participate?
  - b. How long has IGS participated in each program and on what date did IGS begin participating?
  - c. How many customers does IGS have enrolled in each transportation program?
  - d. How has the existence of a PPS program in each of those states affected IGS's ability to enroll customers in transportation programs?
  - e. In each of the states referenced earlier in this question, how many customers has IGS enrolled through the transportation programs in each state since the inception of PPS programs in each state?
10. When a customer calls IGS, does IGS inform customers of any products or services offered by any of IGS's competitors?
  - a. If the answer is yes, please describe the information provided by IGS.
  - b. If the answer is no, please explain why IGS does not offer such information to customers.
11. Does IGS's website provide information about the products or services of any of IGS's competitors?
  - a. If the answer is yes, please describe the information provided by IGS.
  - b. If the answer is no, please explain why IGS does not offer such information to customers.
12. Please describe the start up costs incurred by IGS associated with IGS's entry into the CHOICE program and into the transportation programs of Columbia Gas of Kentucky, Columbia Gas of Pennsylvania, Columbia Gas of Virginia, and NIPSCO.
13. Please describe IGS's costs to market and serve IGS' customers.
  - a. What is the average IT cost per customer?
  - b. What is the average customer service cost per customer?
  - c. What is the average cost of securing gas supply and hedging per customer, excluding the actual cost of the gas commodity?
  - d. What is the average advertising cost per customer?
  - e. What is the largest component of the prices IGS charges to a customer, excluding the actual cost of the gas commodity?

Dated at Columbus, Ohio, this 12<sup>th</sup> day of August 2009.

Respectfully submitted,  
**COLUMBIA GAS OF KENTUCKY, INC.**

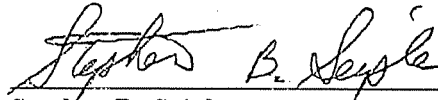
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Attorneys for  
**COLUMBIA GAS OF KENTUCKY, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Data Requests of Columbia Gas of Kentucky, Inc., to IGS were served upon all parties of record by regular U. S. mail and/or by email this 12<sup>th</sup> day of August, 2009.



Stephen B. Seiple  
Attorney for  
COLUMBIA GAS OF KENTUCKY INC.

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