

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

RECEIVED

AUG 13 2009

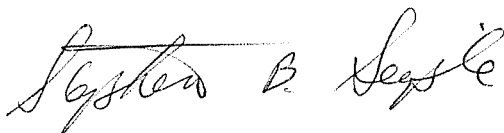
**PUBLIC SERVICE
COMMISSION**

RE: Case No. 2009-00141

Dear Mr. Derouen,

Enclosed for filing are Columbia Gas of Kentucky's Data Requests Served Upon AARP. 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,



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.)

COLUMBIA GAS OF KENTUCKY, INC.'S
DATA REQUESTS SERVED UPON
AARP

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 AARP 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:

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Telephone: (614) 460-4648
Fax: (614) 460-6986
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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

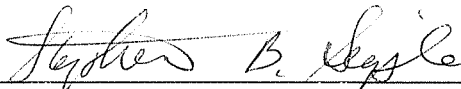
1. Regarding the Direct Testimony of Nancy Brockway, page 5, lines 19-25. Please provide all studies, memoranda, data or other material regarding gas usage of customers age 65 or older utilized by Ms. Brockway to support her testimony.
2. Regarding the Direct Testimony of Nancy Brockway, page 5. Please provide all studies, memoranda, data or other material regarding consumers age 65 or older membership in the low-income customer class of natural gas utilities utilized by Ms. Brockway to support her testimony.
3. Regarding the Direct Testimony of Nancy Brockway, page 6-7. Please provide the raw data and written report, memoranda and other material from the Residential Energy and Consumption Survey for 2005 performed by John Howat of the National Consumer Law Center for Kentucky.
4. Regarding the Direct Testimony of Nancy Brockway, page 6, lines 19-21. Please provide the studies, memoranda, data or other material which support Ms. Brockway's statement regarding Columbia's customers having usage below the level needed to benefit from the proposed SFV rate design.
5. Regarding the Direct Testimony of Nancy Brockway, page 7, lines 14-16. Please provide all studies, memoranda, data or other material supporting Ms. Brockway's statement regarding gas usage of low-income customers as compared to non-low-income customers.
6. Regarding the Direct Testimony of Nancy Brockway, page 7, lines 30-32, page 8, lines 1-5. Please provide the raw data and written report, memoranda and other material from the most recent federal Residential Energy and Consumption Survey performed by John Howat of the National Consumer Law Center, including the data which concludes that low income customers use less gas than other customers.
7. Regarding the Direct Testimony of Nancy Brockway, page 8, lines 3-5. Please explain how Columbia's residential customers who receive LIHEAP assistance likely have disproportionately higher usage than the low-income customers' average usage. Please include any and all studies, memoranda, data or other material relied upon in that assessment.
8. Regarding the Direct Testimony of Nancy Brockway, page 8, line 28. Please provide all studies, memoranda, data or other material supporting Ms. Brockway's opinion regarding the gas cost savings under Columbia's proposed DSM program.
9. Regarding the Direct Testimony of Nancy Brockway, page 8, lines 31-33. Please describe how the replacement of inefficient appliances with high-efficiency appliances will not reduce gas usage of customers in the proposed DSM programs.

10. Regarding the Direct Testimony of Nancy Brockway, page 11-12. Please provide all studies, memoranda, data or other material relied upon regarding the recovery of fixed costs for the following service industries: hairdressing, purchasing of propane gas, legal services, accounting services, and retail stores.
11. Regarding the Direct Testimony of Nancy Brockway, page 12, lines 8-14. What does Ms. Brockway believe would be an appropriate time frame in which to gradually introduce a new rate design?
12. Regarding the Direct Testimony of Nancy Brockway, pages 12-13. Please provide any historical data, forecasts or projections regarding gas usage for the Columbia Gas of Kentucky service territory, Kentucky or the East South Central Census region relied upon to determine that gas usage reductions have bottomed out.
13. Regarding the Direct Testimony of Nancy Brockway, page 13, lines 17-20. Please explain and provide any studies, memoranda, data and other material relating thereto, how the standard of reasonable rates can be met if a utility remains at risk for usage reductions.
14. Regarding the Direct Testimony of Nancy Brockway, page 13, lines 20-21. Please provide all studies, memoranda, data or other material to support Ms. Brockway's statement regarding the rise of coal and electricity prices in Kentucky.
15. Regarding the Direct Testimony of Nancy Brockway, page 14, lines 24-28. Please provide all studies, memoranda, data or other material to support Ms. Brockway's conclusion that the SFV proposal will both virtually guarantee Columbia's allowed rate of return and shift the risk of over earning onto customers.
16. Regarding the Direct Testimony of Nancy Brockway, pages 14-15. Please provide all expert testimony presented by Ms. Brockway in previous public utility commission proceedings related to the cost of equity determination for a regulated utility company.
17. Regarding the Direct Testimony of Nancy Brockway, page 15, lines 25-27. Please provide all studies, memoranda, data or other material relied upon regarding reasons customers do not pay their gas bills.
 - a. If the information relied upon is the Public Service Lifestyle Survey from 1983, contained in Exhibit NB-6, pages 3-4, please provide any more recent studies, memoranda, data or other material that Ms. Brockway relied upon regarding reasons customers do not pay their gas bills.
18. Regarding the Direct Testimony of Nancy Brockway, page 16, lines 6-13. Please provide a copy of each utility's survey which are alleged to have concluded that few non-paying customers actually had the money to pay their gas bill.

19. Regarding the Direct Testimony of Nancy Brockway, page 16, lines 20-21. Please provide a copy of the raw data of Exhibit NB-6, Ron Grosse, *Win-Win Alternatives for Credit and Collections*.
20. Regarding the Direct Testimony of Nancy Brockway, page 17, lines 14-21. Please explain how the Wisconsin Public Service funded and recovered the cost of the Early Intervention Program.
21. Regarding the Direct Testimony of Nancy Brockway, page 20, lines 17-19. Please provide any studies, memoranda, data and other material concluding that weakening the incentive to manage commodity-related uncollectible expenses can lead to less effective collections and customer relations.

Dated at Columbus, Ohio, this 12th day of August 2009.

Respectfully submitted,
COLUMBIA GAS OF KENTUCKY, INC.

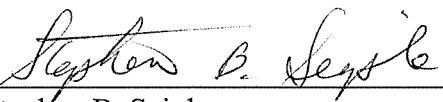
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Attorneys for
COLUMBIA GAS OF KENTUCKY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Data Requests of Columbia Gas of Kentucky, Inc., were served upon all parties of record by regular U. S. mail this 12th day of August, 2009.



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

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