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PURSUING JUSTICE RESTORING HOPE

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July 14, 2010

Via Hand Delivery

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

RECEIVED

JUL 14 2010

**PUBLIC SERVICE
COMMISSION**

**Re: Case No. 2010-00146
An Investigation of Natural Gas Retail Competition Programs**

Dear Mr. Derouen:

Enclosed for filing in the above-captioned matter please find an original plus ten (10) copies of each of the following:

- First Request For Information Of Association Of Community Ministries To Columbia Gas Of Kentucky, Inc.
- First Request For Information Of Association Of Community Ministries To Retail Energy Supply Association

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy of each of these documents, and returning it to me in the enclosed self addressed stamped envelope.

Thank you for your assistance in this matter. Please contact me if you need further information.

Very truly yours,

Eileen Ordover
Attorney for ACM

Cc: Parties of record



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JUL 14 2010
PUBLIC SERVICE
COMMISSION

In The Matter Of:

AN INVESTIGATION OF NATURAL GAS) CASE NO.
RETAIL COMPETITION PROGRAMS) 2010-00146

**FIRST REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY
MINISTRIES TO COLUMBIA GAS OF KENTUCKY, INC.**

Pursuant to the Procedural Order issued in this matter on June 8, 2010, Association of Community Ministries (“ACM”), by counsel, requests the response of Columbia Gas of Kentucky, Inc. to the following Requests for Information.

GENERAL INSTRUCTIONS

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (4) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.
- (5) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature of and legal basis for the privilege asserted.
- (6) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

REQUESTS FOR INFORMATION

1. Please refer to pages 5 and 6 of the Prepared Direct Testimony of Judy M. Cooper On Behalf of Columbia Gas of Kentucky, Inc. Note that on page 5, line 21 Ms. Cooper states that an original goal of the Columbia CHOICE program was that “[t]he program must provide an opportunity for customers to save money on their gas bills.” Note further that, according to the testimony at lines 23 through 38 on page 6, this is no longer a goal.

(a) When did Columbia change this goal, particularly as it relates to residential customers?

(b) Please explain the basis of Columbia’s decision to change this goal, particularly as it relates to residential customers.

(c) Please provide copies of any report, study, analyses or other information upon which Columbia relied, in whole or part, in deciding to change this goal.

2. Please continue to refer to pages 5 and 6 of the Prepared Direct Testimony of Judy M. Cooper On Behalf of Columbia Gas of Kentucky, Inc. In regard to residential customers, what is the difference between the original goal that the CHOICE program “must provide an opportunity for customers to save money on their gas bills,” as stated on page 5, lines 21-22, and the current goal, as stated on page 6, lines 26 -28, that residential customers have “an opportunity for reduced gas prices and/or more stable gas prices”?

3. For each year that the CHOICE program has been in operation, please provide:

(a) The average cost per Mcf paid by residential customers participating in the CHOICE program; and

(b) The average cost per Mcf paid by residential customers purchasing their natural gas from Columbia.

4. For each year that the CHOICE program has been in operation, please provide:

(a) The amount of the average total monthly bill for natural gas services paid by residential customers participating in the CHOICE program; and

(b) The amount of the average total monthly bill for natural gas services paid by residential customers purchasing their natural gas from Columbia.

5. Please provide a comparison of how much residential CHOICE customers in the aggregate have paid for natural gas over the life of the CHOICE program versus what they would have paid had they purchased their natural gas from Columbia.

6. For each year that the CHOICE program has been in operation, please state how many and what percentage of Columbia's residential customers participated in CHOICE.

7. For each year that the CHOICE program has been in operation, please provide:

(a) the number of residential CHOICE customers disconnected from service for nonpayment, and

(b) the number of residential customers purchasing their gas from Columbia that were disconnected from service for nonpayment.

8. Please refer to page 6 of the Prepared Direct Testimony of Judy M. Cooper On Behalf of Columbia Gas of Kentucky, Inc. Note that on lines 16 through 18, Ms. Cooper states that an original goal of the Columbia CHOICE program was that “[c]ustomer education is critical to the success of the program and customers must have an opportunity to learn about the program for a period of time before they begin to receive offers from marketers.” Note further that, according to the testimony at lines 23 through 38 on page 6, this is no longer a goal.

(a) When did Columbia change this goal, particularly as it relates to residential customers?

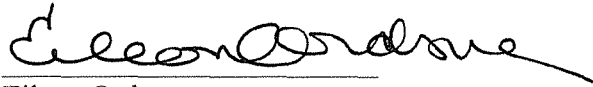
(b) Please explain the basis of Columbia's decision to change this goal, particularly as it relates to residential customers.

(c) Please provide copies of any report, study, analyses or other information upon which Columbia relied, in whole or part, in deciding to change this goal.

9. For each year that the CHOICE program has been in existence, please provide the following:

- (a) the total volume of billing inquiries from residential customers in Kentucky received by Columbia Gas's Customer Contact Center; and
- (b) the number of the billing inquiries in (a), above, that were from CHOICE customers.

Respectfully submitted,

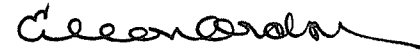


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing First Request For Information Of Association Of Community Ministries To Columbia Gas Of Kentucky, Inc. was served on the following parties on the 14th day of July, 2010 by United States mail, postage prepaid.



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