

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	
REASONABLENESS OF THE)	CASE NO.
CONSERVATION/ENERGY EFFICIENCY)	2018-00029
PROGRAM OF DELTA NATURAL GAS)	
COMPANY, INC.)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
DELTA NATURAL GAS COMPANY, INC.

Delta Natural Gas Company, Inc. ("Delta"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due June 14, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Delta shall make timely amendments to any prior response if it obtains information, which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

Delta fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Delta shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Delta's response to Staff's First Request for Information ("Staff's First Request"), Item 1.

a. Delta states that the Ratepayer Impact Measure ("RIM") is the most important test in determining if the Conservation/Efficiency Program ("CEP") is fair, just, and reasonable. Provide a list of other Kentucky utilities who primarily rely on the RIM as the primary test in determining whether or not to implement a demand-side management program.

b. Delta states that if the Commission orders the CEP to be reduced or eliminated, Delta requests the option, at its discretion, to continue a similar rebate program on its own.

(1) Explain how such an optional CEP program would be funded.

(2) Explain how such an optional CEP program would be implemented and the revisions that would be needed to Delta's existing CEP tariff.

2. Refer to Delta's response to Staff's First Request, Item 2. Explain if Delta has considered a CEP targeted towards low-income customers.

3. Refer to the Application, CEP Billing Factor Calculation. For the CEPRC – Conservation/Efficiency Recovery Component, the estimated residential sales are 1,617,000 Ccf. Refer to Delta's Tariff filing, TFS 2016-00735, CEP Billing Factor Calculation. Here, the CEPRC – Conservation/Efficiency Recovery Component estimated residential sales are 15,932,000 Ccf. Explain why the estimated sales are 14,315,000 Ccf less in the current calculation as compared to the 2016 filing. If this is an error, provide an update to the billing factor calculations.

4. Refer to the table included in Delta's response to the Attorney General's First Request for Information, Item 6.

a. Provide the amounts of the average residential customer's monthly consumption and monthly bill by year from 2010 through April 2018, used as inputs in the table.

b. Recalculate the percent of total bill and per bill impact for 2017 assuming the same average monthly consumption and monthly bill except that the CEP rate is \$.24857 per Ccf for the entire year.

c. Recalculate the percent of total bill and per bill impact for 2017 assuming the same average monthly consumption and monthly bill except that the CEP rate is revised to reflect Delta's response to Item 3 above.


for Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED **JUN 07 2018**

cc: Parties of Record

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