

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	
REASONABLENESS OF THE ENERGY)	CASE NO.
EFFICIENCY AND CONSERVATION RIDER OF)	2018-00044
COLUMBIA GAS OF KENTUCKY, INC.)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO
COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. (Columbia Kentucky), 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 July 31, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. 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.

Columbia Kentucky 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 Columbia Gas 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, Columbia Kentucky 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 Columbia Kentucky's Response to Staff's Third Request for Information (Staff's Third Request), Attachment A, the Net Ben – LIHEF Replacement tab, the Total Resource Cost (TRC) Test Calculations.

a. Provide support for the Estimated Participant Cost of \$690.

b. Refer to the Retained MCF column. Explain why the calculation for the Retained MCF cell D67, references estimated costs per participant rather than the number of participants.

c. Also refer to Columbia Kentucky's Corrected Response to Staff's Second Request for Information (Staff's Second Request), Corrected Attachment B, Net Ben – LIHEF Replacement tab, the TRC Test Calculations. Refer to the Estimated MCF savings. Explain why the savings is different between the two spreadsheets.

2. Refer to Columbia Kentucky's Response to Staff's Third Request, Attachment A, the Net Ben HEA Rebate tab, the TRC Test Calculations.

a. Provide support for the Estimated Participant Cost of \$903.

b. Also refer to Columbia Kentucky's Corrected Response to Staff's Second Request for Information (Staff's Second Request), Corrected Attachment B, Net Ben – HEA Rebate tab, the TRC Test Calculations. Refer to the Estimated MCF savings. Explain why the savings is different between the two spreadsheets

c. Refer to Columbia Kentucky's Corrected Response to Staff's Second Request, Corrected Attachment B, Net Ben HEA Rebate tab, the TRC Test Calculations.

(1) Explain why the number of participants changes from 143 in the prior filing to 1,250 in the most current filing.

(2) Explain why the number of participants is greater than the annual average participation rate as reported in Exhibit Seelye-4 of the Direct Testimony of William Steven Seelye (Seelye Testimony).

3. Provide any updates to the California Tests in Excel spreadsheet format with all formulas unprotected and all rows and columns accessible.

4. Refer to the Direct Testimony of Herbert A. Miller, Jr, page 5, lines 6–8.

a. Explain if the decline of the average annual residential consumption of natural gas from 72.4 Mcf to 68.8 Mcf has been normalized/weather adjusted.

b. Explain if Mr. Miller is attributing the 5 percent decline in residential average use to Columbia Kentucky's Demand-Side Management (DSM) programs.

c. If the response to 4b is no, provide all other factors that Columbia Kentucky attributes to this decline.

5. Refer to the Seeley Testimony, page 21, lines 9–11.

a. Provide all studies and resources that support Columbia Kentucky's assertion that the appliance rebate and replacement programs are the contributing factors to the abatement of the decline in residential customers.

b. Provide any other sources that Columbia Kentucky believes is a contributing factor to the abatement of the decline in residential customers.

c. Provide the number of new customers since 2009 that have also participated in the appliance rebate program.

6. Refer to the Seeley Testimony, page 22, lines 5–17.

a. Explain if contractors are able to participate in the appliance rebate program.

b. Explain if Columbia Kentucky believes a purpose of DSM programs is for customer retention.

7. Refer to the Seelye Testimony, page 23, lines 12–15. Provide any customer surveys and studies that Columbia conducted to support its claim that Columbia Kentucky's appliance rebate programs could prevent another significant customer decrease as it experienced during the 2002 to 2009 timeline.

8. Refer to the Seeley Testimony, page 24, lines 5–15. Explain if it is Columbia Kentucky's position that if it had the appliance rebate program from 2002 through 2009, the utility would not have lost 5,000 customers.

9. Refer to the Seeley Testimony, Exhibit Seelye-3.

- a. Explain the increase in program administration costs from October 2015 through October 2017.
- b. Explain why these costs are not included in the TRC scores.



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DATED **JUL 23 2018**

cc: Parties of Record

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