COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF COLUMBIA)	
GAS OF KENTUCKY, INC. TO EXTEND ITS)	CASE NO.
SMALL VOLUME GAS TRANSPORTATION)	2021-00386
SERVICE)	

COMMISSION STAFF'S SECOND 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 electronic version of the following information. The information requested is due on February 18, 2022. The Commission directs Columbia Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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 the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 amendment to any prior response if Columbia Kentucky obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Columbia Kentucky fails or refuses to furnish all or part of the requested information, Columbia Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper 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 First Request for Information, Item 3. State the cost to Columbia Kentucky for each of the listed features.

2. Refer to the Direct Testimony of Judy M. Cooper (Cooper Testimony), page 4. Explain why Columbia Kentucky proposed to extend the Small Volume Aggregation Service and Small Volume Gas Transportation Service (CHOICE program) as a pilot program, including whether Columbia Kentucky has evaluated whether a permanent CHOICE program would benefit its customers.

-2-

3. Refer to the Cooper Testimony, page 5. Confirm that Columbia Kentucky proposed to return all CHOICE program participants to the applicable general sales rate schedule effective with Columbia Kentucky's April 2022 billing cycle if an order is not issued extending the current March 31, 2022 expiration date. If so, explain how Columbia Kentucky would effectuate this reversion and the effect on the participating customers if the CHOICE program is ultimately extended after April 1, 2022.

4. State whether Columbia Kentucky has refused to certify a Marketer because the Marketer could not meet Columbia Kentucky's requirements.

5. Provide the savings, calculated as the amount paid by customers compared to the amount the customers would have paid if they had not elected to be supplied by a marketer, which CHOICE program participants have achieved each year for the past five years. If possible, provide the savings separately for residential and commercial customers.

6. Confirm that Columbia Kentucky mails annual notices to all customers who participate in the CHOICE program. If confirmed, provide the date of the last annual mailing and provide a sample notice.

7. Explain whether Columbia Kentucky knows the contract term and cancellation fee for each CHOICE program participant.

8. Explain whether Columbia Kentucky bills any cancellation fees for CHOICE program marketers.

9. Refer to the CHOICE program survey responses, Table of Contents. Provide the "Executive Summary."

10. Refer to the CHOICE program survey responses.

-3-

a. Refer to page 1. Confirm that all of the information provided in the CHOICE program survey responses, including the respondents' profile and the summary of research, is based on how the respondents identified themselves as Choice or non-Choice customers. If this cannot be confirmed, explain.

b. Confirm that of the 165 residential CHOICE program participants surveyed, only 71 correctly identified themselves as CHOICE program participants. If this cannot be confirmed, explain.

c. Refer to page 2. Confirm that of the 13 commercial CHOICE program participants surveyed, zero correctly identified themselves as CHOICE program participants. If this cannot be confirmed, explain.

11. Refer to the CHOICE program survey responses, Summary of the Research section.

a. Refer to pages 8 and 10. Confirm that 67.6 percent of residential CHOICE program participants, who correctly identified themselves as CHOICE program participants, responded that they purportedly joined the CHOICE program to save money and responded that they are very to somewhat likely to end their participation if their monthly bills are not lower as a result of the CHOICE program. If confirmed, explain whether Columbia Kentucky understands these responses to indicate that residential customers believe the greatest benefit of participation in the CHOICE program is to achieve savings.

b. Refer to page 13. Confirm that the vast majority of Columbia Kentucky's residential customers are not aware of Columbia Kentucky's calculator tool or the Commission's resources for supplier rates. If this cannot be confirmed, explain.

Case No. 2021-00386

-4-

12. Refer to the CHOICE program survey responses, pages 23–24. Several comments from customers seem to indicate a lack of understanding about the difference between a gas utility and a gas marketer. Explain whether Columbia Kentucky has additional information or insight into the apparent confusion that CHOICE program participation does not dissolve the customer's relationship with Columbia Kentucky.

Bridwell

Linda C. Bridwell, PE Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED ______ FEB 03 2022

cc: Parties of Record

*L Allyson Honaker Goss Samford, PLLC 2365 Harrodsburg Road, Suite B325 Lexington, KENTUCKY 40504

*Brian R Greene GreeneHurlocker, PLC 4908 Monument Avenue, Suite 200 Richmond, VIRGINIA 23230

*David S Samford Goss Samford, PLLC 2365 Harrodsburg Road, Suite B325 Lexington, KENTUCKY 40504 *Honorable Matthew R Malone Attorney at Law Hurt, Deckard & May The Equus Building 127 West Main Street Lexington, KENTUCKY 40507

*Columbia Gas of Kentucky, Inc. 290 W Nationwide Blvd Columbus, OH 43215

*Victoria L Howell GreeneHurlocker, PLC 4908 Monument Avenue, Suite 200 Richmond, VIRGINIA 23230

*Gregory T Dutton Frost Brown Todd, LLC 400 West Market Street 32nd Floor Louisville, KENTUCKY 40202-3363

*James Deckard Hurt, Deckard & May The Equus Building 127 West Main Street Lexington, KENTUCKY 40507

*Judy M Cooper Director, Regulatory Services Columbia Gas of Kentucky, Inc. 2001 Mercer Road P. O. Box 14241 Lexington, KY 40512-4241

*Joseph M. Clark Columbia Gas of Kentucky, Inc. 2001 Mercer Road P. O. Box 14241 Lexington, KY 40512-4241