

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF COLUMBIA)	
GAS OF KENTUCKY, INC. FOR AN)	CASE NO.
ADJUSTMENT OF RATES; APPROVAL OF)	2024-00092
DEPRECIATION STUDY; APPROVAL OF TARIFF)	
REVISIONS; AND OTHER RELIEF)	

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

Columbia Gas of Kentucky, Inc. (Columbia Kentucky), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on October 4, 2024. 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 or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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 the Application, Direct Testimony of John J. Spanos (Spanos Direct Testimony), page 20.

- a. Provide a detailed list of all prior depreciation studies previously conducted where a Public Utility Commission has accepted the use of a depreciation study conducted on historical test year plant balances to forecast plant retirements,

salvage, cost of removal, reserve, and balances, by account, as of multiple years in the future, for ratemaking purposes.

b. Describe how the above response is supported with respect to Attachment JJS-2, on page 48 (2023 Depreciation Study, page VI-1), which states,

The calculated annual and accrued depreciation are the principal results of the study. Continued surveillance and periodic revision are normally required to maintain continued use of appropriate annual depreciation accrual rates. An assumption that accrual rates can remain unchanged over a long period of time implies a disregard for the inherent variability in service lives and net salvage for the change of the composition of property in service.

2. Refer to Spanos Attachment JJS-2, page 37, paragraph 3 (2023 Depreciation Study, page III-4). State what is the typical range of life spans for the plant accounts covered in this depreciation study and provide a copy of all industry studies, surveys, and other documentation relied upon by Gannett Fleming to formulate its opinions.

3. Refer to Spanos Attachment JJS-2, page 41, paragraph 2. (2023 Depreciation Study, page IV-3). State what is the typical range of salvage and cost of removal for the plant accounts covered in this depreciation study and provide a copy of all industry studies, surveys, and other documentation relied upon by Gannett Fleming to formulate its opinions.

4. Provide the following in Excel spreadsheet format with all formulas, rows, columns, and cells unprotected and fully accessible:

a. Schedules set forth in Part VI (Results of Study) of the 2023 Depreciation Study (numbered in Spanos Attachment JJS-2 as pages 50 through 51 of 240).

b. Schedules set forth in Part VII (Service Life Statistics) of the 2023 Depreciation Study (numbered in Spanos Attachment JJS-2 as pages 54 through 155 of 240).

c. Schedules set forth in Part VIII (Net Salvage Statistics) of the 2023 Depreciation Study (numbered in Spanos Attachment JJS-2 as pages 157 through 240 of 240).

d. Schedules set forth in “Results of Study” of the 2025 Depreciation Study (numbered in Spanos Attachment JJS-3 as pages 3 through 9 of 47).

e. Schedules set forth in “Detailed Depreciation Calculations” of the 2025 Depreciation Study (numbered in Spanos Attachment JJS-3 as pages 10 through 47 of 47).

5. Refer to the 2023 Depreciation Study generally. For each depreciable plant account, provide a narrative description explaining how Gannett Fleming arrived at the recommended depreciation parameters (average service life, survivor curve, and net salvage rate) based on the results of statistical analyses of historical data; the range of values for these parameters used in the gas utility industry; and insights obtained from discussions with Columbia Kentucky management, accounting, engineering, and field personnel.

6. Refer to Columbia Kentucky’s response to Commission Staff’s Third Request for Information, Item 1, Attachment, NiSource’s Distribution Integrity Management Plan (DIMP). Provide the following Kentucky specific data:

a. Identified Threats: Identify any threats to pipeline integrity that are specific to Kentucky.

b. Mitigation Measures: Identify and explain any steps or measures being taken to reduce or mitigate any identified threats.

7. Leak Management Program: Provide an overview of any leak management program specific to Kentucky. Performance Measures: Identify any metrics used to evaluate the performance of DIMP-related projects and initiatives in Kentucky.

8. Refer to Application, Attachment JTG-1, Page 14, line 356. Explain the miscellaneous software investment in the Green Path Rider.

9. Refer to Columbia Kentucky's response to Commission Staff's First Request for Information, Item 38 as well as the Attorney General's response to Staff's First Request for Information, Item 3. Explain whether direct labor includes contract labor.



Linda C. Bridwell, PE
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Public Service Commission
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DATED SEP 16 2024

cc: Parties of Record

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