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October 24, 2011

**Federal Express**

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

RECEIVED

OCT 25 2011

PUBLIC SERVICE  
COMMISSION

**RE: BULLDOG'S ENTERPRISES, INC. V. DUKE ENERGY KENTUCKY,  
INC.**

Dear Mr. Derouen:

Enclosed please find an original and six copies of Bulldog's Enterprises Supplemental Response To Respondent's Initial Requests for Production of Documents and Interrogatories.

Sincerely,

Loretta Little  
Assistant to Eric C. Deters

/ll

Encl.

cc: Mark David Gross

Q:\DUKE ENERGY\ltr. Public Service Commission  
10-24-11 wpd

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 25 2011

PUBLIC SERVICE  
COMMISSION

BULLDOG'S ENTERPRISES, INC. d/b/a )  
BULLDOG'S ROAD HOUSE )  
COMPLAINANT )  
)  
VS. )  
)  
DUKE ENERGY KENTUCKY, INC. )  
RESPONDENT )

Case No. 2010-00404

BULLDOG'S ROAD HOUSE SUPPLEMENTAL REPOSE TO RESPONDENT'S INITIAL  
REQUESTS FOR PROCUCTION OF DOCUMENTS AND INTERROGATORIES

Comes now the Complainant, Bulldog's Road House, by counsel, and pursuant to the September 22, 2011 Informal Conference, does hereby further respond to the first set of data request submitted by Respondent, Duke Energy Kentucky, Inc., as set forth below:

**Bulldog's Road House**

**Supplemental Response to the Initial Data Request of Duke Energy Kentucky  
Dated: October 21, 2011**

**Case No. 2010-00404**

**Responding Witness: Eric C. Deters**

REQUESTS FOR PRODUCTION

3. Please produce an audio recording or transcript of any discussions you have had about the facts of this case during a radio broadcast in which you were a participant.

**RESPONSE:**

Respondent does not possess, and does not have the ability to obtain, an audio recording or transcript of any discussions, if any, about the facts of this case during a radio broadcast in which he may have been a participant. I didn't save any. All my podcasts were taken down by 700 WLW. I have no idea what show it would be either.

**Bulldog's Road House**

**Supplemental Response to the Initial Data Request of Duke Energy Kentucky  
Dated: October 21, 2011**

**Case No. 2010-00404**

**Responding Witness: Eric C. Deters**

5. Please produce a copy of all payroll records arising from or relating to work performed by any individuals identified in response to interrogatory \_\_. To the extent that any confidential information may be set forth in said records, the Complainant should consider seeking a designation of the confidential information pursuant to 807 KAR 5:001, Section 7.

**RESPONSE:**

Respondent does not possess, and does not have the ability to obtain, any payroll records relating to his former business, as his former business closed over twelve months ago. All records were thrown away. There was no need to keep them. If Duke would like a release to access these records from the payroll company Paycor and obtain the records from there, Respondent will sign one.

**Bulldog's Road House**

**Supplemental Response to the Initial Data Request of Duke Energy Kentucky  
Dated: October 21, 2011**

**Case No. 2010-00404**

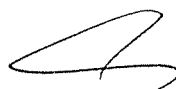
**Responding Witness: Eric C. Deters**

6. Please produce a copy of all bills of sale, bills of lading, invoices, receipts or other documents arising from or relating to deliveries of food, beverages, goods or supplies to the Premises on or after June 1, 2010.

**RESPONSE:**

Respondent does not possess, and does not have the ability to obtain, any bills of sale, bills of lading, invoices, receipts or other documents arising from or relating to deliveries of food, beverages, goods or supplies relating to his former business, as his former business closed over twelve months ago. The records were thrown away. If acceptable, Respondent could obtain his checking account records for this time period and it would reflect the lack of checks being written for these items during this time period.

Respectfully submitted,



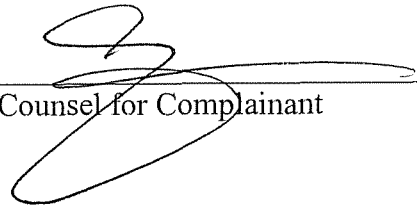
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Email: [eric@ericdeters.com](mailto:eric@ericdeters.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2011, a copy of the foregoing was served via regular U.S. mail, postage pre-paid, upon the following:

Mark David Gross  
Frost Brown Todd, LLC  
250 W. Main Street, Suite 2800  
Lexington, KY 40507-1749

  
Counsel for Complainant

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