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PUBLIC SERVICE
COMMISSION

September 7, 2010

Via Hand-Delivery

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

RE: *Case No. 2010-00146; An Investigation of Natural Gas Retail Competition Programs*

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of Interstate Gas Supply Inc.'s, SouthStar Energy Services, LLC's and Vectren Source's data request responses to the following:

- The Commission Staff; and
- The Association of Community Ministries

Please place the documents of file.

Regards,



Matthew Malone

C: File; Parties

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION OF NATURAL GAS)
RETAIL COMPETITION PROGRAMS)

CASE NO.2010-00146

**INTERSTATE GAS SUPPLY, INC.'S, SOUTHSTAR ENERGY SERVICES,
LLC'S AND VECTREN SOURCE'S CERTIFICATE OF SERVICE REGARDING
DATA REQUEST RESPONSES TO ACM**

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, individually, and collectively, by counsel, and hereby certify that an original and ten (10) copies of the attached data request responses to ACM were served via hand-delivery upon Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class US Mail, postage prepaid, on the following, on this 7th day of September 2010:

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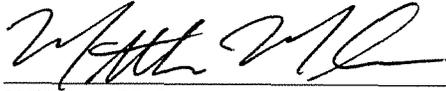
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Respectfully submitted,



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SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

**INTERSTATE GAS SUPPLY, INC., SOUTHSTAR ENERGY
SERVICES, LLC'S AND VECTREN SOURCE'S
RESPONSE TO DATA REQUEST OF ACM**

Request for Information 1

Please refer to Retail Suppliers' response to Request No. 1 of the First Information Request of Commission Staff, wherein it is stated on page 10 that "the introduction of competition does not displace utility services related to customer payment," and that "[b]udget billing options, extended payment arrangements and low income assistance programs can continue without impact."

- (a) For each utility service area in which any of the Retail Suppliers operate, please identify and describe the budget billing options, extended payment arrangements and low income assistance programs available to residential customers.

Response. Objection. This questions calls for the Retail Suppliers to engage in independent research regarding each program in which they participate to ascertain information that is equally available to ACM, which ACM can investigate through the same means available to the Retail Suppliers. Without waiving the objection, in each program where purchase of receivables (POR) exists in which the Retail Suppliers are aware, the utility continues to offer a budget billing option to consumers. This is the case in all 4 Ohio programs, in New York, Pennsylvania, Michigan, Indiana, and on

the Columbia Kentucky system. In Georgia, the suppliers are responsible for the billing and various options are available. In Illinois, Nicor Gas offers a budget bill for its charges and the supplier can offer a budget billing option for its charges. Where bill ready billing is available, regardless of whether it is a POR situation, the supplier could offer a budget bill option. Because most of the programs offer purchase of receivables, payment arrangements are managed by the utility under the same terms and conditions offered by the utility as a provision of the program. The purchase of receivables program makes the utility the owner of all rights, title and interest in the receivable, which allows them to treat the receivable as they would any other, so that as a condition of the program the same opportunities and protections exist for the customer getting competitive supply service as a customer served by the utility. This includes access to assistance programs, or if access to assistance programs would be impeded the rules have developed so that those customers participating in such programs would be considered ineligible for competitive service. For example, in Illinois both LIHEAP and PIPP (percentage of income payment program) are available to customers regardless of whether they take competitive service or regulated service for commodity. In Ohio, customers that are participating in PIPP are considered ineligible for choice service.

(b) For each option, arrangement or program identified in (a), above, please indicate whether the option, arrangement or program is available to customers who purchase their gas supply from Retail Suppliers or other competitive suppliers.

Response. See response to question 1(a), above.

(c) Do any of the Retail Suppliers offer budget billing options, extended payment arrangements, arrearage management or low income assistance programs to their residential Customers? If “yes,” please provide the following information concerning each such offering:

- i. a detailed description of the offering;
- ii. the name of the Retail Supplier involved;
- iii, the state and utility service territory in which the offering is available;
- iv. any written information provided to customers about the offering.

Response. Objection. This request seeks information which is overly broad and irrelevant to this proceeding. Without waiving the objection, as discussed in response to question 1(a) in jurisdictions where purchase of receivables is available in the choice programs, the utility provides a consolidated bill that includes both the utility charges and the competitive charges, and offers the same programs it offers for budget billing, extended payment arrangements, arrearage management and low income assistance programs that it offers for residential customers not purchasing competitive supply. With respect to the Retail Suppliers specifically, in jurisdictions where purchase of receivables is not available, the supplier is responsible for managing the receivables and as such offers various programs including budget

billing, extended payment arrangements and arrearage management programs. Low income assistance programs are paid for with funds either collected by or managed by the LDC.

Biography of Vincent Parisi, Esq.
General Counsel and Regulatory Affairs Officer of IGS Energy

As the general counsel and regulatory affairs officer for one of the biggest retail gas marketing companies in the country, Vincent Parisi has developed an impressive career in the natural gas industry. In 2003, Vince joined IGS Energy as general counsel, working on many aspects of the daily business including credit and risk, compliance, regulatory compliance, certifications and reviewing marketing materials and interactions with consumers for compliance with Federal, State and Commission rules and laws governing those relationships. Prior to coming to IGS Energy, Vince worked as an associate with the Columbus Ohio law firm Chester, Willcox & Saxbe LLP as a business attorney and litigator, working with IGS Energy as a client in a number of areas.

In his career to date with IGS Energy, Vince is responsible for all regulatory, legislative and related work in all of the market areas in which IGS Energy operates, including seven states and approximately 14 utility service territories. In addition, Vince oversees the compliance, legal and regulatory departments for IGS Energy, managing the interaction with outside counsel, regulatory and legislative consultants and interactions with competitive companies on regulatory and legislative matters. In his role with IGS Energy, Vince also manages its relationships with several groups with the charge of being involved in regulatory, legislative and utility processes to help to make the competitive markets more dynamic and competitive. These groups include National Energy Marketers Association, where Vince serves as the Co-chair for the Midwest on Natural Gas Policy, Ohio Gas Marketers Group, Illinois Retail Gas Suppliers, New York State Energy Marketers Coalition, and ad hoc groups in others states, including Kentucky, Pennsylvania and elsewhere.

In his regulatory and legislative role, Vince has worked on rules and legislation in Pennsylvania under the S.E.A.R.C.H. process, in Illinois, Michigan, Ohio, New York revisions to the Uniform Business Practices Act, as well as in Kentucky. Also, Vince has worked through rate cases and commodity review processes in several territories, including Nicor Gas, Peoples Northshore, MichCon, Consumers Energy, Duke Ohio, Columbia Gas of Ohio, Pennsylvania, and Kentucky, Vectren Delivery of Ohio, Dominion East Ohio, NIPSCO, National Fuel, Niagara Mohawk, Central Hudson, Pennsylvania Gas Works, and Chesapeake and had oversight of IGS' regulatory team in cases in Baltimore Gas & Electric, Washington Gas & Electric, ConEd, Keyspan. Vince has also been involved in rule reviews in Maryland, New Jersey, New York, Ohio, Michigan, Illinois, Pennsylvania and Indiana related to evolving choice programs.

IGS is somewhat unique in that it is privately held, has no long-term debt and relies on traditional bank financing. IGS Energy has been in business for over 20 years, in choice markets for residential customers for over 10 and has been successfully been providing choice natural gas products to consumers throughout that time. Vince attributes IGS Energy's success to a focus on customer service and an understanding of the gas industry.

Raised in Toledo, Ohio, Vince has resided in the Columbus Ohio area for over 20 years, is a graduate of The Ohio State University with an undergraduate degree in Economics, graduate of Capital University Law School with a Juris Doctorate, magna cum laude, and an LLM from Capital University in Business and Tax. Vince is married and has three children.