

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BULLDOG'S ENTERPRISES, INC. D/B/A)	
BULLDOG'S ROADHOUSE)	
)	CASE NO.
V.)	2010-00404
)	
DUKE ENERGY KENTUCKY, INC.)	
)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO BULLDOG'S ENTERPRISES, INC. D/B/A BULLDOG'S ROADHOUSE

Bulldog's Enterprises, Inc. d/b/a Bulldog's Roadhouse ("Bulldog"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due on or before December 14, 2011. Responses to requests for information shall be appropriately bound, tabbed and indexed. 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 the 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.

Bulldog shall make timely amendment 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 Bulldog 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 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.

1. Refer to Bulldog's response to Items 2.b. and 2.c of Duke Energy Kentucky, Inc.'s ("Duke Kentucky") Initial Request for Production of Documents and Interrogatories ("Duke Kentucky's Initial Request"). In these responses, Bulldog states that the restaurant was used during the July 4, 2010 weekend and one other night in July.

a. Provide the number of days the restaurant would have been in use in preparation for these events.

b. State the level at which the thermostat would have been set for preparation days and event days.

2. Refer to Bulldog's response to Items 3.a. of Duke Kentucky's Initial Request. Bulldog states that the "air was off." However, in a June 29, 2010 letter to

Duke Kentucky,¹ Mr. Eric Deters states that “our air conditioner has been off or on 80 the entire time.” State whether the air conditioner was turned off or set to 80 degrees.

3. The complaint letters and e-mails attached to Bulldog’s response appear to pertain to Duke Energy Ohio, Inc. and not Duke Kentucky. State which, if any, of the complaint letters or e-mails pertain to Duke Kentucky.



Jeff Berouen
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED NOV 30 2011

cc: Parties of Record

¹ The letter was attached to Bulldog’s response to Duke Kentucky’s Initial Request.

Rocco D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East 4th Street, R. 25 At II
P. O. Box 960
Cincinnati, OH 45201

Eric C Deters
Eric Deters & Associates
5247 Madison Pike
Independence, KENTUCKY 41051

Mark David Goss
Frost, Brown, Todd, LLC
250 West Main Street
Suite 2800
Lexington, KENTUCKY 40507

David S Samford
Frost, Brown, Todd, LLC
250 West Main Street
Suite 2800
Lexington, KENTUCKY 40507