COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In t	he	M	latter	of:
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COLUMBIA GAS OF KENTUCKY, INC.)
COMPLAINANT)) CASE NO
V.) 2009-00340
NATURAL ENERGY UTILITY CORPORATION)
DEFENDANT)

SECOND DATA REQUEST OF COMMISSION STAFF TO COLUMBIA GAS OF KENTUCKY, INC.

Columbia Gas of Kentucky, Inc. ("Columbia"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than April 26, 2010. 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 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.

Columbia 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 Columbia 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.

- 1. Refer to Columbia's response to Item 3 of the First Data Request of Natural Energy Utility Corporation ("NEUC's First Request") and Item 1 of the First Data Request of Commission Staff.
- a. The bills provided for Checkers Video & Laundromat at 1001 13th Street are addressed to Jim Gibbs. Provide the name of the person responsible for the account at this location.
- b. The bills provided for Ashland Mandarin at 915 13th Street are addressed to Fenkai Chen. Provide the name of the person responsible for the account at this location.
- c. Provide the name of the person responsible for the account at 901
 13th Street.
- d. Columbia states that it received a letter on July 22, 2009 from Shannon Gibbs requesting that the gas service at 901 13th Street, 915 13th Street and

1200 Bryan Street, Ashland, Kentucky be disconnected in October 2009. Confirm that Ms. Gibbs is the person responsible for these accounts or has authorization to request termination of service.

2. NEUC references a mutual agreement between Columbia and NEUC at page 3 of its Motion to Dismiss. In its response to Item 2 of Commission Staff's First Request to NEUC, it states that the agreement is unwritten. State whether Columbia is familiar with the mutual agreement discussed by NEUC. If so, provide a brief summary of the terms of the agreement, the intent of the parties to the agreement, and the date the agreement was reached.

Jeff Defouen

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, Ky. 40602

DATED: APR 1 2 2010

cc: Parties of Record

H. Jay Freeman President Natural Energy Utility Corporation 2560 Hoods Creek Pike Ashland, KY 41102

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