

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION OF NATURAL GAS)	ADMINISTRATIVE
RETAIL COMPETITION PROGRAMS)	CASE NO. 2010-00146

COMMISSION STAFF'S FIRST INFORMATION REQUEST
TO INTERSTATE GAS SUPPLY, INC., SOUTHSTAR ENERGY
SERVICES, LLC, AND VECTREN RETAIL, LLC D/B/A VECTREN SOURCE

Interstate Gas Supply, Inc., SouthStar Energy Services, LLC, and Vectren Retail, LLC d/b/a Vectren Source ("Retail Suppliers"), pursuant to 807 KAR 5:001, are to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than July 29, 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 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 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.

Retail Suppliers shall make timely amendment to any prior response if they obtain 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 Retail Suppliers fail or refuse to furnish all or part of the requested information, Retail Suppliers shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should 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. Although the Testimony of Gregory F. Collins ("Collins Testimony"), generally addresses many of the 15 elements contained on pages 14 and 15 of the Commission's Order of April 19, 2010, it did not specifically address each element the Kentucky General Assembly directed the Commission to consider. Explain whether the Commission should consider Retail Suppliers' silence on the elements not addressed to mean that Retail Suppliers have no stated position on these elements. If no, then Retail Suppliers should state their positions. The 15 elements have been reproduced here for convenience.

- The role of the Commission in a competitive marketplace;
- The obligation to serve;
- The supplier of last resort;
- Alternative commodity procurement procedures;
- Non-discriminatory access to services offered;
- Codes of conduct for marketers and affiliates of regulated utilities;

- Billing which should include the desirability of the purchase of receivables;
- Certification of suppliers;
- Transition costs;
- Stranded costs;
- Uncollectibles;
- Disconnections;
- Steps necessary to maintain system integrity;
- Access to pipeline storage capacity; and
- Impacts of new natural gas retail competition programs on existing utility services and customers.

2. Provide:

- a. A list of the states in which Retail Suppliers provide small-volume customers with gas supply.
- b. The utilities in whose service territories Retail Suppliers are active in each state.
- c. The number of customers of each utility identified in b. above and the number of customers served by Retail Suppliers within the utility's service territory.
- d. The length of time Retail Suppliers have served customers in each utility's service territory.
- e. The experience of Retail Suppliers' customer growth (or decline) in each utility's service territory.
- f. For each response to items a. through e. above, indicate the mix of residential and commercial customers served by Retail Suppliers.

3. Columbia Gas of Kentucky ("Columbia") filed the most recent annual report on its Choice Program with the Commission on June 4, 2010. The last paragraph on page 2 of the report indicates that, since the inception of the program through the most recent month available when the report was filed, participants in the program had paid \$17,280,299 more than "[i]f they had not opted to be supplied by a marketer in the first place." Explain whether Retail Suppliers consider Columbia's Choice Program to be successful, from a customer perspective, based on the absence of customer savings.



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cc: Parties of Record

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