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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)
)
 AN INVESTIGATION OF THE)
 ENERGY AND REGULATORY ISSUES) CASE NO. 2007-00477
 IN SECTION 50 OF KENTUCKY'S 2007)
 ENERGY ACT)

DUKE ENERGY KENTUCKY, INC.'S REQUESTS FOR INFORMATION TO THE STAND
ENERGY CORPORATION

Now comes Duke Energy Kentucky, Inc., and submits its Requests for information to the Stand Energy Corp. ("Stand Energy"), to be answered by the date specified in the Commission's Order and in accord with the following:

For purpose of these discovery requests, the following terms shall have meanings set forth below:

(1) As used herein, "document", "documentation" and/or "record", whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. "Document" and "record" also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

(2) The terms “relating to”, “referring to”, “referred to”, “pertaining to”, “pertained to” and “relates to” means referring to, reporting, embodying, establishing, evidencing, comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.

(3) The terms “and”, “or”, and “and/or” within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.

(4) To “identify” shall mean:

(a) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

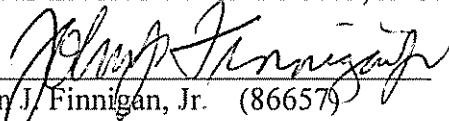
(b) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.

(c) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal business address of that person.

(5) To “produce” or to “identify and produce”, shall mean that Stand Energy shall produce each document or other requested tangible thing. For each tangible thing which Stand Energy contends are privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.



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REQUESTS FOR INFORMATION

1. Referring to the top of page 3 of Witness Mark Ward's Testimony, please explain how a competitive natural gas market would "better align the financial interests of the utility with the goals of achieving energy efficiency."

Response:

2. Please identify and describe all demand side management ("DSM") and energy efficiency programs that Stand Energy currently offers to its customers in Kentucky.

Response:

3. Does Stand Energy currently have any plans to offer DSM or Energy Efficiency programs to its Kentucky customers in the next 12 months? If the response is in the affirmative, please list and describe such programs.

Response:

4. Please identify and describe all DSM and energy efficiency programs that Stand Energy currently offers to its customers in Ohio, and in particular, in Duke Energy Ohio's Service Territory.

Response:

CERTIFICATE OF SERVICE

I certify that a copy of the attached Requests for Information to Stand Energy on behalf of Duke Energy Kentucky, Inc. has been served by UPS overnight mail to the following parties on this 10th day of March, 2008:

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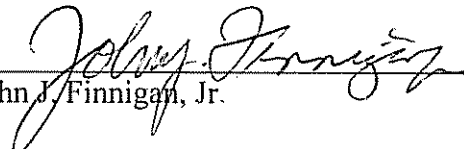
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