### **COMMONWEALTH OF KENTUCKY**

# BEFORE THE PUBLIC SERVICE COMMISSIGNECEIVED

JUL 1 4 2010

PUBLIC SERVICE COMMISSION

### In The Matter Of:

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

## FIRST REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY MINISTRIES TO RETAIL ENERGY SUPPLY ASSOCIATION

Pursuant to the Procedural Order issued in this matter on June 8, 2010,

Association of Community Ministries ("ACM"), by counsel, requests the response of

Retail Energy Supply Association ("RESA") to the following Requests for Information.

### GENERAL INSTRUCTIONS

(1) Please identify the company and witness who will be prepared to answer questions concerning each request.

(2) If any request appears confusing, please request clarification directly from the undersigned.

(3) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(4) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.

(5) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature of and legal basis for the privilege asserted.

(6) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

#### **REQUESTS FOR INFORMATION**

1. Please provide a list of the members of RESA. For each member, please indicate whether the company markets natural gas to residential customers and, if so, in what state(s) it does so.

2. Please refer to page 4, lines 21-23 of the Direct Testimony Of Teresa L. Ringenbach On Behalf Of The Retail Energy Supply Association. Please provide the empirical evidence underlying the assertion therein that residential customers in states with choice programs "typically can choose from a broad array of price products that often serve to better reflect the unique economic and energy needs of that individual customer."

3. Please refer to page 5, lines 1- 3 of Ms. Ringenbach's direct testimony. Please provide the empirical evidence underlying the assertions therein that with retail choice, "customers become more engaged in what appears on their energy bill," and that "[t]his in turn leads to customer concentration on not only price but on how energy is used."

4. Please refer to pages 7 - 8 of Ms. Ringenbach's direct testimony, wherein she discusses the role of the Public Service Commission in a competitive market for residential customers. Does RESA support collection of a fee from natural gas marketers to fund this role in Kentucky?

5. Please refer to page 17, lines 2 - 9 of Ms. Ringenbach's direct testimony, wherein she discusses the need for licensing by the Kentucky Public Service Commission of

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suppliers serving residential customers. Does RESA support collection of a fee from natural gas marketers to fund such a licensing program?

Respectfully submitted,

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Attorneys for ACM

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing First Request For Information Of Association Of Community Ministries To Retail Energy Supply Association. was served on the following parties on the 14th day of July, 2010 by United States mail, postage prepaid.

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