

LEGAL AID SOCIETY

PURSUING JUSTICE RESTORING HOPE

EILEEN L ORDOVER (502) 614-3125 EORDOVER@LASLOU ORG

July 28, 2010

RECEIVED

Via Hand Delivery

Mr. Jeff Derouen **Executive Director** Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

JUL 28 2010

PUBLIC SERVICE COMMISSION

Re:

Case No. 2010-00146

An Investigation of Natural Gas Retail Competition Programs

Dear Mr. Derouen:

Enclosed for filing in the above-captioned matter please find an original plus ten (10) copies of Response of Association of Community Ministries to the First Information Requests of Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy, and returning it to me in the enclosed self addressed stamped envelope.

Thank you for your assistance in this matter. Please contact me if you need further information.

Very truly yours,

Eileen Ordover

decomposione

Attorney for ACM

Cc: Parties of record







COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF
ASSOCIATION OF COMMUNITY MINISTRIES
TO THE FIRST INFORMATION REQUESTS OF
INTERSTATE GAS SUPPLY, INC., SOUTHSTAR ENERGY SERVICES, LLC,
AND VECTREN SOURCE

Filed: July 28, 2010

VERIFICATION

COMMONWEALTH OF KENTUCKY)	
)	SS
COUNTY OF JEFFERSON)	

The undersigned, Marlon Cummings, being duly sworn, deposes and states that he has personal knowledge of the matters set forth in the Response of Association of Community Ministries ("ACM") to First Information Requests Of Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source and that the answers contained therein are true and correct to the best of his information, knowledge and belief.

MARLON CUMMINGS

Subscribed and sworn to before me, this 27th day of July, 2010.

NOTARY PUBLIC

KENTUCKY STATE AT LARGE

deemandone

My Commission expires: 3/1/2012

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Response of Association of Community Ministries to First Information Requests Of Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source was served on the following parties on the 28th day of July, 2010 by United States mail, postage prepaid.

Eileen Ordover Counsel for ACM

a leen Ordn

Lonnie E Bellar Vice President, State Regulation Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40202

Stephen Bennett Retail Policy Manager - East/Midwest Exelon Power Team 300 Exelon Way Kennett Square, PA 19348

John B Brown Chief Financial Officer, Treasurer Delta Natural Gas Company, Inc. 3617 Lexington Road Winchester, KY 40391

Judy Cooper Columbia Gas of Kentucky, Inc. 2001 Mercer Road P. O. Box 14241 Lexington, KY 40512-4241 Rocco D'Ascenzo Senior Counsel Duke Energy Kentucky, Inc. 139 East 4th Street, R. 25 At II P. O. Box 960 Cincinnati, OH 45201

John M Dosker General Counsel Stand Energy Corporation 1077 Celestial Street Building 3, Suite 110 Cincinnati, OH 45202-1629

Trevor L Earl Reed Weitkamp Schell & Vice PLLC 500 West Jefferson Street Suite 2400 Louisville, KY 40202-2812

Thomas J Fitzgerald Counsel & Director Kentucky Resources Council, Inc. Post Office Box 1070 Frankfort, KY 40602

Michael T. Griffiths, Esq. ProLiance Energy, LLC 111 Monument Circle, Suite 2200 Indianapolis, IN 46204-0000 Sandra Minch Guthorn Senior Counsel Regulatory Affairs MXEnergy Inc 100 10 Junction Drive. Suite 104-S Annapolis Junction, MD 2070 1

Brooke E Leslie Columbia Gas of Kentucky, Inc. 200 Civic Center Drive P.O. Box 117 Columbus, OH 43216-0117

Matthew R Malone Attorney at Law Hurt, Crosbie & May PLLC The Equus Building 127 West Main Street Lexington, KY 40507

Mark Martin VP Rates & Regulatory Affairs Atmos Energy Corporation 3275 Highland Pointe Drive Owensboro, KY 42303

Tracy McCormick Executive Director Retail Energy Suppliers Association P.O. Box 6089 Harrisburg, PA 171 12 Teresa Ringenbach, Manager Government & Regulatory Affairs-MW Direct Energy, LLC 9605 El Camino Lane Plain City, OH 43064

Stephen R. Seiple, Esq. Columbia Gas of Kentucky, Inc. 200 Civic Center Drive P.O. Box 117 Columbus, Ohio 432 16-01 17

Lisa M. Simpkins V.P.-Energy Policy, Natural Gas Constellation Energy Resources 111 Market Place, Suite 500 Baltimore, MD 21403

Iris G Skidmore Bates and Skidmore 415 W. Main Street, Suite 2 Frankfort, KY 40601

Katherine K Yunker John B. Park Yunker & Park, PLC P.O. Box 21784 Lexington, KY 40522-1784

CASE NO. 2010-00146

Response of Association of Community Ministries ("ACM") to First Information Requests Of Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source

Responding Witness: Marlon Cummings

Q-1. In preparing your testimony, please identify with whom you discussed the issue of retail competition?

Λ-1. I discussed the issue of retail competition with ACM's legal counsel.

CASE NO. 2010-00146

Response of Association of Community Ministries ("ACM") to First Information Requests Of Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source

- Q-2. Please provide copies of all work papers, documents or data used to complete your testimony.
- A-2. I did not use work papers to complete my testimony. The documents and data I used are attached to my testimony as exhibits A, B and C.

CASE NO. 2010-00146

Response of Association of Community Ministries ("ACM") to First Information Requests Of Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source

- Q-3. Please refer to p. 3 lines 10-13 in your testimony where you refer to having reviewed information from, "the LIHEAP Clearinghouse, newspaper coverage, and other sources available to the general public.." please provide copies of the data you reviewed in compiling your testimony and all work papers or data used to complete your testimony.
- Λ-3. Please see the response to Q.-2. The data I reviewed in compiling my testimony is the data included in the documents attached to my testimony in Exhibits A, B and C.

CASE NO. 2010-00146

Response of Association of Community Ministries ("ACM") to First Information Requests Of Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source

- Q-4. Please refer to p. 4 lines 2-5 in your testimony, where you refer to relying upon "media reports" please provide any documentation you relied upon in creating your testimony beyond what has been provided in Exhibit "A."
- Λ-4. All the documentation I relied upon has been provided in Exhibit "A."

CASE NO. 2010-00146

Response of Association of Community Ministries ("ACM") to First Information Requests Of Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source

- Q-5. Please refer to p. 4 lines 15 in your testimony where you indicate, "...it appears that states restructuring or deregulating natural gas service to residential customers have also, through legislation and/or regulation, put into place mandatory low income energy assistance programs to ameliorate the potential harsh impact on low-income customers". Please advise what evidence or documentation you possess to support this statement beyond your Exhibit "B."
 - a. Additionally, please confirm whether prior to deregulation in Georgia and Ohio whether some low income customers were already receiving benefits from low income energy assistance programs were in place?
- A-5. All of the evidence or documentation I possess is in Exhibit "B."
- A-5(a). I have no knowledge of whether or not low-income energy assistance programs were in place in Georgia and Ohio prior to deregulation.