

#### LEGAL AID SOCIETY

PURSUING JUSTICE RESTORING HOPE

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August 19, 2010

RECEIVED

Via USPS Express Mail

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601 AUG 2 0 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 each of the following:

- Second Request For Information Of Association Of Community Ministries To Columbia Gas Of Kentucky, Inc.
- Second Request For Information Of Association Of Community Ministries To Retail Energy Supply Association
- First Request For Information Of Association Of Community Ministries To 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 of each of these documents, 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.

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Very truly yours,

Eileen Ordover Attorney for ACM

Cc: Parties of record







## COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 2 0 2010

PUBLIC SERVICE COMMISSION

In The Matter Of:

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

# SECOND 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 refer to RESA's response to Request No. 2 of ACM's First Requests for Information.
  - (a) Please specify where in the websites listed therein ACM may find the empirical evidence underlying the assertion in the Direct Testimony of Teresa L. Ringenbach that the price products available to residential customers in states with choice programs "often serve to better reflect the unique economic and energy needs of that individual customer."
  - (b) If RESA cannot so specify, please provide said empirical evidence, as previously requested by ACM.
- 2. Please refer to RESA's response to Request No. 3 of ACM's First Requests for Information. Please confirm that the Attachments referenced therein are the sole empirical evidence underlying the assertion at page 5, lines 1-3 of Ms. Ringenbach's direct testimony 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." If this is not the case, please provide the remainder of the empirical evidence underlying said assertion.
- 3. Please refer to Attachment 1 to RESA's Responses to Duke Energy of Kentucky, Inc., ACM and the AARP Initial Data Requests, entitled Ohio Natural Gas Choice, Analysis of Customer Benefits, dated October 9, 2009 and prepared by Intelometry.

- (a) Please confirm that this study was commissioned and paid for by Direct Energy, a RESA member that markets natural gas to residential customers in Ohio.
- (b) Please identify and provide contact information for any other companies or organizations that participated in funding, designing or commissioning this study, or in developing the scope of work to be performed by Intelometry.

Respectfully submitted,

Eileen Ordover

Lisa Kilkelly

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Attorneys for ACM

### CERTIFICATE OF SERVICE

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

Eileen Ordover

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