

RECEIVED

OCT 11 2010

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN INVESTIGATION OF NATURAL GAS ) Case No. 2010-00146  
RETAIL COMPETITION PROGRAMS )

---

**STAND ENERGY CORPORATION'S REVISED RESPONSES TO REQUESTS FOR  
INFORMATION FROM LOUISVILLE GAS & ELECTRIC COMPANY**

---

Intervenor, Stand Energy Corporation ("SEC"), by and through counsel, submits the following revised responses to requests for information from Louisville Gas & Electric:

1. On unnumbered page 5 of 13 of Mark Ward's testimony, he states that "Stand Energy has served the Kentucky State Reformatory in Lagrange [sic] Kentucky which is served by Louisville Gas in [sic] Electric (LG&E). In the five years we have served this account the reformatory has saved \$522,000 over what they would have paid LG&E." For the period indicated by Stand Energy, please provide the following: (1) all supporting workpapers and all spreadsheets with formulas intact, data, and other documents showing in detail how the \$522,000 in claimed savings was calculated, and (2) a copy of all invoices rendered by Stand Energy to the Kentucky State Reformatory for natural gas service.

**Revised Response: Responder: Mark Ward.**

The attached spreadsheets (Attachment A attached hereto and incorporated herein as if fully set forth) show the difference between what the State Reformatory paid for natural gas versus the LG&E GCR. There is an individual spreadsheet for each of the fiscal years from July 2005 through May 2010. Also included are the monthly invoice reconciliation sheets for the period in question. The reconciliation sheet for each month shows the actual amount paid for that month. The invoices sent at the beginning of the month reflect projected nominations. At the end of the month the invoice is reconciled to reflect actual deliveries to LG&E for that month. The difference on the reconciliation will be added or subtracted in subsequent invoices. The dollar value for the savings analysis in the spreadsheets was taken from the monthly reconciliations.

2. On unnumbered page 9 of 13 of Mark Ward's testimony, he states that "We also serve a large motel complex in the Louisville area. Since January 2009 the account has saved close to \$35,000 over what they would have paid LG&E for tariff gas." For the period indicated by Stand Energy, please provide the following: (1) all supporting workpapers, and all spreadsheets with formulas intact, data and other documents showing in detail how the \$35,000 in claimed savings was calculated, and (2) a copy of all invoices rendered by Stand Energy to the motel complex for natural gas service.

**Revised Response: Responder: Mark Ward.**

The attached spreadsheet (Attachment B, attached hereto and incorporated herein as if fully set forth) shows two different analyses for the [REDACTED]. One compares what the hotel paid to Stand Energy in comparison with the LG&E GCR had they stayed on the monthly variable rate in the Stand Energy Contract from January 2009 through May 2010. This shows a

potential savings of \$55,655. For budget control purposes and to avoid the volatile swings in gas prices the hotel decided to fix prices from August 2009 through May 2010. The resultant actual savings over the entire period was \$22,714. The \$35,000 savings stated in Ward's testimony compared the actual calendar 2009 savings of \$54,218 minus the potential savings(loss) of a minus \$19,622, or \$34,596 and should have used the actual negative savings of \$31,503 in 2010. Also included are the monthly invoice reconciliation sheets for the period in question.

### VERIFICATION

I, Mark T. Ward, being duly sworn under oath state that I am Vice President of Regulatory Affairs for Stand Energy Corporation and that the statements contained herein are true and correct as I verily believe.

  
\_\_\_\_\_  
MARK T. WARD

**STATE OF OHIO  
COUNTY OF FRANKLIN**

Signed and sworn to before me, a Notary Public for the State of Ohio, on this 11<sup>th</sup> day of October, 2010 by Mark T. Ward, who stated that these responses were prepared by him on behalf of Stand Energy Corporation and that the responses are true and accurate to the best of his knowledge, information and belief formed after a reasonable inquiry. My commission expires: \_\_\_\_\_.



**CHRISTOPHER M. WARD**  
**ATTORNEY AT LAW**  
Notary Public, State of Ohio  
My Commission Has No Expiration  
Section 147.03 R.C.

  
\_\_\_\_\_  
NOTARY PUBLIC STATE-AT-LARGE.