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COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION

SEP 07 2010 PUBLIC SERVICE COMMISSION

In the Matter of:

An Investigation of Natural Gas Retail Competition Programs

Case No. 2010-00146

#### **Response of**

# Retail Energy Supply Association to the Association of Community Ministries' 8/20/10 Supplemental Data Requests

Retail Energy Supply Association ("RESA") hereby responds to the supplemental data

requests propounded by the Association of Community Ministries on August 20, 2010. RESA's

response consists of one bound volume of text responses.

Respectfully submitted,

Katherine K. Yunker John B. Park YUNKER & PARK PLC P.O. Box 21784 Lexington, KY 40522-1784 (859) 255-0629

ATTORNEYS FOR RETAIL ENERGY SUPPLY ASSOCIATION

# CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this the 7% day of <u>September</u>, 2010, the original and ten (10) copies of the foregoing were hand delivered to the Commission for filing, and a copy was served, via U.S. Mail, first-class, postage prepaid, on each person at the address shown on the attached Service List.

Attorney for Retail Energy Supply Association

#### **CERTIFICATION**

STATE OF Ohio SS: COUNTY OF Frankli

The undersigned, Teresa L. Ringenbach, being duly sworn, certifies that I am the Manager of Government and Regulatory Affairs for the Midwest for Direct Energy, LLC and is the Ohio Retail Energy Supply Association State Chair. I further certify that the following responses of Retail Energy Supply Association were prepared by me or under my supervision and are true and correct to the best of my information, knowledge and belief formed after reasonable inquiry.

Ten.

Teresa Ringenbach

SUBSCRIBED and SWORN to before me, a Notary Public, this  $2^{\frac{m}{2}}$  day of

September, 2010.

MARY D. SZYMANSKI Notary Public, State of Ohio My Commission Expires Aug. 19, 2014

Muy Degymanski Notary Public My commission expires: <u>Pug. 19</u>, 2014

### Request:

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.

#### **Response**:

- a. The sites list a variety of product offerings from which customers can choose including fixed, variable, seasonal and mixed product offerings. Contracts of various lengths are available, from one month up to two years, as well as quarterly and seasonal contracts. The variety of products allows customers to choose what best fits their needs rather than a one-size-fits-all approach.
- b. The sites reflect the wide variety of products and services available to residents of states with customer choice programs. The assertion in the testimony referenced in Request No. 1.a of ACM's Second Requests for Information is the opinion of the witness based not on specific studies but on the long-term personal experience of the witness. Specifically, the statement was made based on Ms. Ringenbach's 10 years in the energy industry. This experience includes work as a Customer Service and Marketing Specialist with Integrys Energy Services. During that time Ms. Ringenbach responded to and assisted customers with making decisions and understanding customer choices and options.

## Request:

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.

#### **Response**:

RESA has not undertaken a search to identify all studies that support the assertion in the testimony referenced in Request No. 2 of ACM's Second Requests for Information to RESA. In addition to the attachments referenced in RESA's Response to Request No 3. of ACM's First Requests for Information to RESA, see the studies provided as Attachments 1, 2, and 3 to RESA's Responses to the first sets of data requests, which indicate price is a factor in energy use and engaging customers in energy efficiency.

# Request:

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.

- 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.
- 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

# **Response:**

a. This was commissioned and paid for by Direct Energy through Intelometry, an independent analysis company.

b. No other companies or organizations participated in funding.