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* Of Counsel

October 27, 2010

RECEIVED

OCT 28 2010

PUBLIC SERVICE
COMMISSION

Kentucky Public Service Commission
Attn: Filing Division
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

RE: *Case No. 2010-00146; An Investigation of Natural Gas Retail Competition Programs*

To Whom It May Concern:

Please find enclosed the original and thirteen (13) copies of Interstate Gas Supply, Inc.'s, Southstar Energy Services, LLC's and Vectren Source's Post Hearing Data Request Responses to the Commission Staff in the above-referenced case.

Please place the document of file and return a file stamped copy to our office using the enclosed pre-addressed stamped envelope.

Thank you in advance for your attention to this matter and should you have any questions or concerns please do not hesitate to contact me.

Regards,



Emily Williams
Paralegal

C: File; Parties

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

RECEIVED

OCT 28 2010

PUBLIC SERVICE
COMMISSION

In the Matter of:

AN INVESTIGATION OF NATURAL GAS)
RETAIL COMPETITION PROGRAMS)

CASE NO.2010-00146

**INTERSTATE GAS SUPPLY, INC.'S, SOUTHSTAR ENERGY SERVICES, LLC'S AND
VECTREN SOURCE'S POST HEARING DATA REQUEST RESPONSES
TO THE COMMISSION STAFF**

Respectfully submitted,

HURT, CROSBIE & MAY PLLC



William H. May, III
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Counsel for,
**INTERSTATE GAS SUPPLY, INC.
SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE**

CERTIFICATE OF SERVICE

Comes Interstate Gas Supply, Inc. (“IGS”), SouthStar Energy Services, LLC (“SouthStar”) and Vectren Retail, LLC d/b/a Vectren Source (“Vectren”), individually, and hereinafter, collectively, by counsel, and hereby certifies that an original and twelve (12) copies of the foregoing was served via facsimile and US Mail, postage prepaid, upon Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail, postage prepaid, on the following, on this 27 day of October 2010.

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

John B Brown
Delta Natural Gas Company, Inc.
36 17 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, Esq.
Duke Energy Kentucky, Inc.
139 East 4th Street, R.25 At II
P. O. Box 960
Cincinnati, OH 45201

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

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

Thomas J. FitzGerald, Esq.
Counsel & Director
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, KY 40602

Lisa Kilkelly, Esq.
Legal Aid Society
416 W. Muhammad Ali Blvd.
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Louisville, Kentucky 40202

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

Brooke E Leslie, Esq.
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columb1ls, OH 43216-0117

Mark Martin
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

Iris G Skidmore, Esq.
4 15 W. Main Street, Suite 2
Frankfort, Kentucky 4060 1

Hon. Lawrence Cook
Assistant Attorney General
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Hon. Mark David Goss
Frost, Brown, Todd, LLC
250 W. Main Street
Suite 2700
Lexington, KY 40507

Hon. Michael T. Griffith
111 Monument Circle Suite 2200
Indianapolis, IN 46204

Hon. Mark Hutchinson
Wilson, Hutchinson & Poteat
611 Frederica Street
Owensboro, KY 42301

Hon. Jeanne Kingery
Duke Energy Business Services, Inc.
155 W. Broad Street, 21st Floor
Columbus, OH 43215

Hon. Carroll M. Redford, III
Miller, Griffin & Marks, PSC
271 W. Short Street, Suite 600
Lexington, KY 40507

Hon. Holly Rachel Smith
Hitt Business Center
3803 Rectortown Road
Marshall, VA 20115

Hon. Robert M. Watt, III
Stoll Keenon & Ogden
300 W. Vine Street
Suite 2100
Lexington, KY 40507-1801



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Counsel for,
INTERSTATE GAS SUPPLY, INC.
SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

**INTERSTATE GAS SUPPLY, INC., SOUTHSTAR ENERGY
SERVICES, LLC'S AND VECTREN SOURCE'S
RESPONSE TO POST HEARING DATA REQUESTS OF COMMISSION STAFF**

Request for Information 1

Please provide the following information regarding Kentucky Consumers for Energy Competition, Inc. ("KCEC").


- (a) Who paid the fees for any of the mailers sent out by KCEC relative to Ms. Williams' testimony?
- (b) From where did the source list of the approximately 22,000 persons identified in Ms. Williams' testimony as having initially received a mailer to join KCEC and the approximate 6,000 that did join arise?
- (c) Please provide a copy of the initial letter that was actually sent to the KCEC members and the mailer to the 1,000 persons as members of KCEC.
- (d) How did KCEC determine the "random sample" for the 1,000 persons that received the mailer/letter from the approximate 6,000 members of KCEC?
- (e) Please verify whether the mailing by KCEC was prepared in-house or by an outside firm?
- (f) Please provide copies of any tax returns for KCEC for 2008 or 2009.

Response

- (a) IGS Energy, Inc.
- (b) The pre-existing list was from persons already enrolled in the Columbia Choice Program and came from IGS Energy, Inc.
- (c) Attached.
- (d) Executive Director of KCEC, Dan Bayens, picked 1,000 persons randomly from the approximate 6,000 members of KCEC.
- (e) The mailer was prepared in-house by Dan Bayens.

- (f) KCEC has had no income and no tax returns have been filed or prepared.

IGSENERGY
 Your Natural Gas Choice.
 IGSEnergy.com

7 - 667 - 2340014 - (2313013) - TANDC-20090818 1
 Homer L Hicks
 190 Mountain Shadows Dr
 Hazard KY 41701-9446


August 18, 2009

Dear Homer L Hicks,

We wanted to take a moment to thank you for choosing IGS Energy as your natural gas supplier. We greatly appreciate the opportunity to serve you.

We also wanted to make you aware of an opportunity to help us improve the natural gas market in Kentucky, which could result in even more options and benefits for you.

The Choice program that you currently participate in allows IGS Energy to supply your natural gas. Your utility, Columbia Gas, continues to deliver the gas through their existing pipes and respond to any emergencies. This program ensures that you have a choice in pricing and plan, while also allowing you to take advantage of the services and support Columbia offers.

The program has been highly successful, as evidenced by the more than 28,000 households and businesses in central and eastern Kentucky that now participate. But there are a couple of simple changes that would make the program even better.

First, the Choice program should be made permanent. Right now, the Columbia program is set to expire in less than two years. If this happens, you would no longer be able to choose your price and plan. IGS Energy would be unable to supply your gas in the future and you would be required to pay Columbia's monopoly rate.

Second, Choice programs like yours should be expanded so that everyone in Kentucky can participate. Currently, only those customers in the Columbia Gas service area can enroll. Opening up the natural gas market statewide would attract more suppliers and greater competition. This could mean lower prices and even more choices for you.

These changes require legislative action, meaning the Kentucky General Assembly must act. But before they act, they must hear from you! And there is an easy way to show your support.

There is a group in Kentucky that is working to make sure these small, but important, changes happen. Kentucky Consumers for Energy Competition (KCEC) provides a voice for natural gas users like you who value having a choice.

There is no cost and no obligation to join. All KCEC needs is to add your voice to the hundreds of others that have already signed up. Simply sign and return the reply card in the pre-paid envelope. That's it! Or you may sign-up online by visiting EnergyChoiceKY.org/join.

We hope you agree that when it comes to natural gas, you deserve the freedom and choice to make the best decisions for you and your family. That's why it's important to make your voice heard.

We value your business and the opportunity to supply your natural gas.

Thank you,

IGS Energy

To join KCEC, please detach, sign, and mail this card in the enclosed pre-paid envelope or sign up online at EnergyChoiceKY.org/join



Yes! I want to join Kentucky Consumers for Energy Competition.
 I value having a choice. I want to add my voice to the hundreds of other natural gas consumers in Kentucky who support freedom and competition!

If necessary, update address on the lines below.

Name: Homer L Hicks
 Address: 137 E Main St
 City, State Zip: Hindman, KY 41822

Address: _____
 City, State Zip: _____

Signature (REQUIRED) _____

Email Address (so we may update you on our progress) _____ 2340014

Update of KCEC activities, your right to choose!

July 26, 2010

Dear Marion Gildersleeve & Jennifer Werman :

I want to briefly take this opportunity to thank you for your support, and give you an update on a couple of important items.

First, your support **helped us to pass legislation** in the 2010 Kentucky General Assembly session that directed the Kentucky Public Service Commission to give the legislature some guidance on how to most efficiently and effectively open natural gas competition to more people in Kentucky.

Second, Columbia Gas of Kentucky, your natural gas utility, has asked the Commission to allow Columbia to **extend its Choice program for another 3 years**. Only through this Choice program can you make a choice regarding who supplies your natural gas and take control of your natural gas price. We think this is great news, and we will be encouraging the Commission to approve the extension of this great program.

While these are both positive steps, our work is not done. We hope that we can count on you to continue to support our efforts to bring effective gas competition to Kentucky. It is our belief that competition creates downward pressures on prices, increases quality, promotes innovation and, most importantly, provides transparency for the buyer and accountability for the seller. If you share these opinions then we could use your help in letting the Kentucky Public Service Commission know that you continue to support the development of competitive natural gas programs.

Your voice in this process is important. Now, more than ever, it is important that the Commission hear from you. Your voice, along with hundreds of others, will let the Commission know that you support energy competition and that you like to have the right to choose your natural gas supplier. And that this choice benefits you because it gives you the control to make decisions that you feel are best for you and your family.

We ask you to take a minute and sign the card below and send it back to us (the postage is pre-paid so you just have to drop it in the mail). We will compile all of the letters and let the Commission know that you support your right to choose and want these programs to *continue and be available for others*.

Thank you again for your support. Choice only works because you participate!

Sincerely,



Dan Bayens, Executive Director

Dear Public Service Commissioners:

I support competition and like having a right to choose my natural gas supplier. Choice programs give me that right. Natural gas choice allows me to take control and decide for myself. Choice creates transparency, and provides me with better information than with only a utility option. Please continue my right to choose, continue the choice program and allow others throughout Kentucky the same opportunity. If you would like to include further comments, please do so on the back of this card.

If necessary, update address on the lines below.

Address: _____

City, State, Zip: _____

Sign to show your support _____

Email Address (so we may update you on our progress) _____

1257854

Comments:

COMMONWEALTH OF KENTUCKY

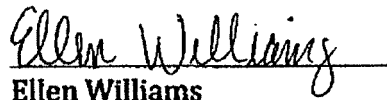
BEFORE THE PUBLIC SERVICE COMMISSION

In re the Matter of:

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

AFFIDAVIT OF ELLEN WILLIAMS

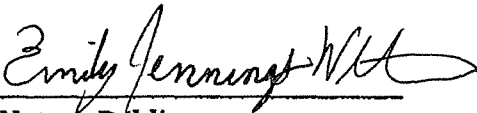
Comes the undersigned, Ellen Williams, being duly sworn, deposes and states that she is a volunteer consultant for Kentucky Consumers for Energy Competition and she is a witness on behalf of Interstate Gas Supply, Inc., SouthStar Energy Services, LLC and Vectren Retail, LLC doing business as Vectren Source, that she has personal knowledge of the matters set forth in the foregoing post-hearing data request responses, and if inquiries were made as to the facts in said testimony she would respond as therein set forth and the answers contained therein are true and correct to the best of her knowledge.


Ellen Williams

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF FAYETTE)

Subscribed and sworn to me this 27th day of October 2010, by Ellen

Williams.



Notary Public

My Commission Expires: 11/21/2011