

RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

MAY 28 2010
PUBLIC SERVICE
COMMISSION

In the Matter of:

An Investigation of Natural Gas Retail
Competition Programs

Case No. 2010-00146

**MOTION OF RETAIL ENERGY SUPPLIERS ASSOCIATION
FOR FULL INTERVENTION**

Pursuant to 807 KAR 5:001 §3(8) and the Order of the Kentucky Public Service Commission (“Commission”) entered April 19, 2010, the Retail Energy Supply Association (“RESA”) hereby moves for full intervenor status in the above-captioned proceeding.

RESA is a non-profit trade association of independent corporations that are among the largest retail suppliers of natural gas and electricity in the United States.¹ RESA’s goals and interests as a trade association of retail energy suppliers differ from and are not adequately represented by any other party or prospective party in the above-captioned case. RESA’s participation will lead to the presentation of relevant facts and issues that will assist the Commission in the investigation of natural gas retail competition programs. RESA’s participation will not unduly complicate, disrupt or delay the proceedings. In support of the foregoing motion, RESA states as follows:

1. RESA’s participation in this proceeding will provide the Commission with the important viewpoint of an association that specifically represents the interests of national retail gas and electricity suppliers. RESA has unique experience in working to open and maintain

¹ RESA’s members include ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Exelon Energy Company; GDF SUEZ Energy Resources NA, Inc.; Gexa Energy; Green Mountain Energy Company; Hess Corporation; Integrys Energy Services, Inc.; Just Energy; Liberty Power; Sempra Energy Solutions LLC. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

competitive markets throughout the United States, and can bring real world knowledge and experience from other states' successes and failures.

2. RESA as a trade association of retail energy suppliers has information and experience that is not possessed by any other party.

3. In particular, RESA can bring to the proceeding the experience and expertise of participating RESA members Constellation New Energy, Gas Division, LLC ("CNEG"), Direct Energy, LLC, and Exelon Energy Company.

4. CNEG is a Kentucky limited liability company with its natural gas office located at 9960 Corporate Campus Drive, Suite 2000, Louisville, Kentucky 40223. CNEG is a retail marketer of natural gas throughout the United States, including in Kentucky, where CNEG provides natural gas service to commercial and industrial end users.

5. Direct Energy, LLC is a retail supplier of natural gas and electricity in 20 states and 10 Canadian provinces. Direct Energy serves all sizes of customers from the smallest residential to the largest industrial customers throughout the United States and Canada with over 5 million customer relationships in North America.

6. Exelon Energy is one of the largest retail energy suppliers in the country, and delivers electricity and natural gas products and services to commercial and industrial customers. Exelon Energy has over 11,000 natural gas accounts in Ohio, Illinois, Michigan and Pennsylvania.

7. RESA requests that the following persons be placed on the service list for this case:

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

Tracy McCormick
Executive Directory
RETAIL ENERGY SUPPLY ASSOCIATION
P.O. Box 6089
Harrisburg, PA 17112


Lisa M. Simpkins
Vice President-Energy Policy, Natural Gas
CONSTELLATION ENERGY RESOURCES
111 Market Place, Suite 500
Baltimore, MD 21202

Teresa Ringenbach, Manager
Government & Regulatory Affairs – Midwest
DIRECT ENERGY, LLC
9605 El Camino Lane
Plain City, OH 43064

Stephen Bennett
Retail Policy Manager – East/Midwest
EXELON POWER TEAM
300 Exelon Way
Kennett Square, PA 19348

WHEREFORE, RESA respectfully requests that the Kentucky Public Service
Commission grant RESA full Intervener status.

Respectfully submitted,

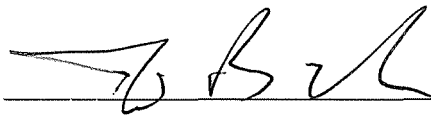


Katherine K. Yunker
John B. Park
YUNKER & PARK PLC
P.O. Box 21784
Lexington, KY 40522-1784
(859) 255-0629

ATTORNEYS FOR RETAIL ENERGY
SUPPLY ASSOCIATION

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this the 28th day of May 2010, the original and ten (10) copies of the foregoing were hand-delivered to the Commission for filing, and that a copy was served via U.S. Mail, first class and postage prepaid, on each person at the address shown on the attached Service List.



Attorney for Retail Energy Supply Association

SERVICE LIST
Ky. PSC Case No. 2010-00146

Tracy McCormick
Executive Director
RETAIL ENERGY SUPPLY ASSOCIATION
P.O. Box 6089
Harrisburg, PA 17112

Lisa M. Simpkins
Vice President-Energy Policy, Natural Gas
CONSTELLATION ENERGY RESOURCES
111 Market Place, Suite 500
Baltimore, MD 21403

Michael T. Griffiths, Esq.
PROLIANCE ENERGY, LLC
111 Monument Circle, Suite 2200
Indianapolis, IN 46204-0000

Stephen Bennett
Retail Policy Manager – East/Midwest
EXELON POWER TEAM
300 Exelon Way
Kennett Square, PA 19348

Lonnie E. Bellar
Vice President – State Regulation
LOUISVILLE GAS AND ELECTRIC COMPANY
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

Rocco D'Ascenzo, Esq.
Senior Counsel
DUKE ENERGY KENTUCKY, INC.
139 East 4th Street, R. 25 At II
P. O. Box 960
Cincinnati, OH 45201

Brooke E. Leslie, Esq.
COLUMBIA GAS OF KENTUCKY, INC.
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117

Teresa Ringenbach, Manager
Government & Regulatory Affairs – Midwest
DIRECT ENERGY, LLC
9605 El Camino Lane
Plain City, OH 43064

Tom Fitzgerald, Esq.
Liz D. Edmondson, Esq.
KENTUCKY RESOURCES COUNCIL, INC.
P.O. Box 1070
Frankfort, KY 40602-1070

Iris G. Skidmore, Esq.
BATES AND SKIDMORE
415 W. Main Street, Suite 2
Frankfort, KY 40601

John B. Brown
Chief Financial Officer, Treasurer
DELTA NATURAL GAS COMPANY, INC.
3617 Lexington Road
Winchester, KY 40391

Judy Cooper
Manager, Regulatory Services
COLUMBIA GAS OF KENTUCKY, INC.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

John M. Dosker, Esq.
General Counsel
STAND ENERGY CORPORATION
1077 Celestial Street
Building 3, Suite 110
Cincinnati, OH 45202-1629

Mark Martin
VP Rates & Regulatory Affairs
ATMOS ENERGY CORPORATION
3275 Highland Pointe Drive
Owensboro, KY 42303