

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

**AN INVESTIGATION OF NATURAL GAS
RETAIL COMPETITION PROGRAMS**

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) **CASE NO. 2010-00146**
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**AARP'S FIRST SET OF REQUESTS TO MXENERGY, INC., PROLIANCE
ENERGY, LLC, AND STAND ENERGY CORPORATION FOR INFORMATION**

Pursuant to the scheduling order adopted by the Commission in this case, AARP requests that MXenergy, Inc., ProLiance Energy, LLC, and Stand Energy Corporation file with the Commission the following information, with a copy to all parties of record, within the time specified in the Commission's Order. For each response to request for information,

- (1) Please identify the individual responsible for answering each request;
- (2) These requests shall be deemed continuing so as to require further and supplemental responses if MXenergy, Inc., ProLiance Energy, LLC, or Stand Energy Corporation receives or generates additional information within the scope of these requests between the time of the response and the time of the hearing;
- (3) A request to identify a document means to state the date or dates, author or originator, the subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian;

(4) To the extent that the specific document, study or information requested does not exist, but a similar document, study or information does exist, please provide the similar document, study or information;

(5) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout;

(6) If MXenergy, Inc., ProLiance Energy, LLC, or Stand Energy Corporation objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify AARP's Attorney of Record as soon as possible;

(7) For any document withheld on the basis of privilege, state the following: date; author; addressee; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted;

(8) In the event any document called for has been destroyed or transferred beyond the control of the company, please state the identity of the person by whom it was destroyed or transferred; the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy; and

(9) Where the information requested is the same as has been provided to another party in response to a request for information, it is sufficient to identify that response rather than duplicating the information requested.

Request for Information 1

To the extent that the testimony filed on behalf of your company includes calculations of savings that any of your members have provided to customers over the costs they would otherwise have paid under regulated utility gas service, please provide all workpapers of each such calculation or estimate, in executable spreadsheet form, with identification of all relevant source material.

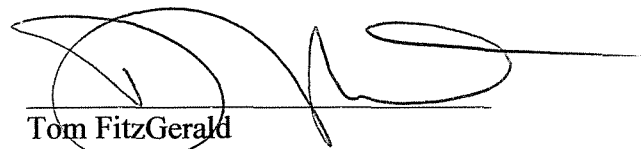
Request for Information 2

To the extent that the testimony filed on behalf of your company asserts that terms and conditions for retail gas choice in Kentucky are more onerous and fees and charges are higher than in other jurisdictions, please provide any analysis or other evidence that demonstrates that the Kentucky terms, conditions, fees or charges are: (a) not cost-based; (b) unjust; or (c) unreasonable.

Request for Information 3

Is it the position of your company that supervision by the Kentucky Public Service Commission of the competitiveness of the retail supply market in Kentucky is: (a) within the jurisdiction of the Commission, and (b) provides a state action protection against application of anti-trust laws to that market? Please provide your reasoning and relevant citations to support your position on these questions.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that an original and ten (10) copies of AARP's First Set of Requests to MXENERGY, INC., PROLIANCE ENERGY, LLC, and STAND ENERGY CORPORATION were transmitted for filing by priority mail to the Docket Clerk, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 and that a true and accurate copy of the foregoing was mailed via first class U.S. Mail, postage prepaid, this 14th day of July, 2010, to the following:

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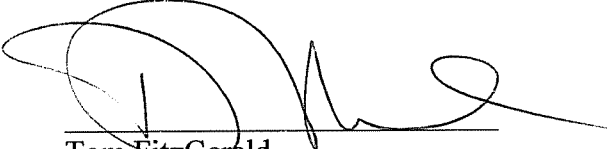
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