



139 East Fourth Street, R. 25 At II
P.O. Box 960
Cincinnati, Ohio 45201-0960
Tel: 513-419-1837
Fax: 513-419-1846
dianne.kuhnell@duke-energy.com

Dianne B. Kuhnell
Senior Paralegal

VIA OVERNIGHT DELIVERY

July 14, 2010

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

RECEIVED

JUL 15 2010

**PUBLIC SERVICE
COMMISSION**

Re: Case No. 2010-00146

Dear Mr. Derouen:

Enclosed please find an original and twelve copies of the *Duke Energy Kentucky, Inc.'s Requests For Information to the Stand Energy Corporation, Duke Energy Kentucky, Inc.'s Requests For Information to the Retail Energy Supply Association and Duke Energy Kentucky, Inc.'s Requests For Information to Interstate Gas Supply, Inc, Southstar Energy Services, LLC, and Vectren Source* being filed in the above referenced matter.

Please date-stamp the two copies of the letter and the filings and return to me in the enclosed envelope.

Sincerely,

Dianne B. Kuhnell
Senior Paralegal

cc: Parties of record

RECEIVED

JUL 15 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)

**DUKE ENERGY KENTUCKY, INC.'S REQUESTS FOR INFORMATION TO INTERSTATE
GAS SUPPLY, INC, SOUTHSTAR ENERGY SERVICES, LLC, AND VECTREN SOURCE**

Now comes Duke Energy Kentucky, Inc., and submits its Requests for information to Interstate Gas Supply, Inc.; SouthStar Energy Services, LLC; and Vectren Retail, LLC d/b/a Vectren Source (“Suppliers”), to be answered by the date specified in the Commission’s Order and in accord with the following:

For purpose of these discovery requests, the following terms shall have meanings set forth below:

(1) As used herein, “document”, “documentation” and/or “record”, whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. “Document” and “record” also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

(2) The terms “relating to”, “referring to”, “referred to”, “pertaining to”, “pertained to” and “relates to” means referring to, reporting, embodying, establishing, evidencing,

comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.

(3) The terms “and”, “or”, and “and/or” within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.

(4) To “identify” shall mean:

(a) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

(b) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.

(c) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal business address of that person.

(5) To “produce” or to “identify and produce”, shall mean that Suppliers shall produce each document or other requested tangible thing. For each tangible thing which Suppliers contend are privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.



Rocco O. D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East Fourth Street, Rm 25 ATII
Cincinnati, Ohio 45201-0960
Phone: (513) 419-1843 /Fax: (513) 419-1846
e-mail: rocco.dascenzo@duke-energy.com

REQUESTS FOR INFORMATION

1. Please provide copies of any and all studies, analysis, reports, or articles including work papers, authored by Suppliers Witness Gregory Collins regarding gas retail choice for the last five years.

RESPONSE:

2. Please identify and produce any study or analysis, including work papers, to support Mr. Collins' claims regarding competition, as described on lines 8 through 20, on page 3 of Mr. Collins' testimony.

RESPONSE:

3. Referring to the answering beginning on page 5, line 20, through 8 of Mr. Collins' testimony, identify and produce the information supporting Mr. Collins' claim that these circumstances "often" or "typically" occur.

RESPONSE:

4. Referring to the answer that begins on page 8, line 19 of Mr. Collins' testimony, has Mr. Collins performed any study or analysis, or authored any reports that discuss and evaluate his "alternative methods" for addressing what he describes as a mismatch and/or compare such "alternative methods" with other approaches? If the response is in the affirmative, please provide such studies, reports or analysis, including all work papers. If the response is in the negative, on what basis does Mr. Collins contend that such methods are "reasonable"?

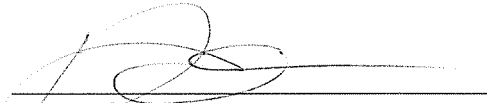
RESPONSE:

5. Referring to the answer that begins on page 10, line 3 of Mr. Collins' testimony, has Mr. Collins performed any study or analysis, or authored any reports that discuss and evaluate consolidated billing and the purchase of receivables with dual billing or consolidated bill without the purchase of receivables or that discuss and evaluate reasonable and appropriate discount rates for the purchase of receivables by regulated utilities? If the response is in the affirmative, please provide such studies, reports or analysis, including all work papers. If the response is in the negative, on what basis does Mr. Collins contend that such methods are beneficial?

RESPONSE:

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.



Rocco O. D'Ascenzo

Senior Counsel

Duke Energy Kentucky, Inc.

139 East Fourth Street, Rm 25 ATII

Cincinnati, Ohio 45201-0960

Phone: (513) 419-1843 /Fax: (513) 419-1846

e-mail: rocco.dascenzo@duke-energy.com

CERTIFICATE OF SERVICE

I certify that a copy of the attached Requests for Information to Suppliers on behalf of Duke Energy Kentucky, Inc. has been served by UPS overnight mail to the following parties on this 14th day of July, 2010.



Rocco O. D'Ascenzo

Paul D. Adams
Office of the Attorney General Utility &
Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601
Honorable Lisa Kilkelly
Attorney at Law
Legal Aid Society
416 West Muhammad Ali Blvd.
Suite 300
Louisville, KY 40202
Brooke E. Leslie
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117

Honorable Matthew R. Malone
Attorney at Law
Hurt, Crosbie & May PLLC The Equus
Building
127 West Main Street
Lexington, KY 40507
Mark Martin
VP Rates & Regulatory Affairs
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

Lonnie E. Bellar
VP – State Regulations and
Louisville Gas and Electric
220 W. Main Street
P.O. Box 32010
Louisville, KY 40202
John B. Brown
Chief Financial Officer, Treasurer
Delta Natural Gas Company, Inc.
3617 Lexington, Road
Winchester, Ky 40391

Judy Cooper
Manager, Regulatory Services
Colombia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. 14241
Lexington, KY 40512-4241
Rocco D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East 4th Street, R. 25 At II
P.O. box 960
Cincinnati, OH 45201
Honorable John M. Dosker
General Counsel
Stand Energy Corporation
1077 Celestial Street
Building 3, Suite 110
Cincinnati, OH 45202-1629

John B. Park
Katherine Y. Yunker
Yunker & Park, PLC
P. O. Box 21784
Lexington, KY 40522-1784
Iris G. Skidmore
415 W. Main Street, Suite 2
Frankfort, KY 40601

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

Trevor L. Earl
Reed Weitkamp Schell & Vice PLLC
500 West Jefferson Street
Suite 2400
Louisville, KY 40202-2812
Thomas J. FitzGerald
Counsel & Director
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KY 40602

RECEIVED

JUL 15 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)

DUKE ENERGY KENTUCKY, INC.'S REQUESTS FOR INFORMATION TO THE RETAIL
ENERGY SUPPLY ASSOCIATION

Now comes Duke Energy Kentucky, Inc., and submits its Requests for information to the Retail Energy Supply Association ("RESA"), to be answered by the date specified in the Commission's Order and in accord with the following:

For purpose of these discovery requests, the following terms shall have meanings set forth below:

(1) As used herein, "document", "documentation" and/or "record", whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. "Document" and "record" also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

(2) The terms "relating to", "referring to", "referred to", "pertaining to", "pertained to" and "relates to" means referring to, reporting, embodying, establishing, evidencing,

comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.

(3) The terms “and”, “or”, and “and/or” within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.

(4) To “identify” shall mean:

(a) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

(b) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.

(c) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal business address of that person.

(5) To “produce” or to “identify and produce”, shall mean that RESA shall produce each document or other requested tangible thing. For each tangible thing which RESA contend are privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.



Rocco D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East Fourth Street, Rm 25 ATII
Cincinnati, Ohio 45201-0960
Phone: (513) 419-1843 /Fax: (513) 419-1846
e-mail: rocco.dascenzo@duke-energy.com

REQUESTS FOR INFORMATION

1. Please provide copies of any and all studies, analysis, reports, or articles including work papers, authored by RESA Witness Teresa Ringenbach regarding gas retail choice during the last five years.

RESPONSE:

2. Referring to the sentence beginning on line 7, page 5, of Ms. Ringenbach's testimony, addressing customers' tendency to simply open bills and pay them if their only option is to remain with the utility, identify and produce any evidence that Ms. Ringenbach relied upon to support that conclusion. Also identify and produce any evidence that the witness relied upon to support the conclusion in the following sentence that the existence of "choice" often prompts a customer to scrutinize options and bills more closely.

RESPONSE:

3. Referring to the sentence beginning on line 2 of page 6, in Ms. Ringenbach's testimony, explain the nature of the switching that gives rise to the figure of 93% switching in Ohio. Specifically, break that percentage down to reflect voluntary, proactive switching initiated by the customer, aggregations, and switching that results from the local distribution company having left the merchant function or being in the process of leaving the merchant function.

RESPONSE:

4. Please identify and produce any study or analysis, including work papers, to support Ms. Ringenbach's statement, on page 6 of her testimony, that customers have become savvier in their energy use as a result of competition.

RESPONSE:

5. Referring to page 6, lines 15 through 20, of Ms. Ringenbach's testimony, please identify and produce any study or analysis, including work papers, to support each of the claims made by Ms. Ringenbach with regard to her assertion that moving the commodity function away from the utility allows the utility to focus on managing its distribution assets, thereby improving safety and streamlining infrastructure costs and efforts, and also allows commission staff to better track cost and spending. If there are no such studies or analysis, explain the basis on which Ms. Ringenbach reaches and supports these conclusions.

RESPONSE:

6. Referring to the answer that begins on line 7, page 8, of Ms. Ringenbach's testimony, identify and produce information, including data, studies, and analyses, as well as work papers, addressing and evaluating customer complaints in New York, Illinois, Michigan, the District of Columbia, Pennsylvania, and Ohio.

RESPONSE:

7. Referring to the 93 percent switching rate for Dominion East Ohio Gas that is referenced on line 2 of page 11 of Ms. Ringenbach's testimony, explain how and why this is relevant to the current proceeding in light of Dominion's exit from the merchant function. Include a description of the impact of that exit on customers and their ability not to switch to a competitive provider.

RESPONSE:

8. Referring to the discussion of customer choice in Wisconsin that begins on line 15, page 11, identify and produce any study, evaluation, or analysis, including workpapers, that supports and/or forms the basis of the conclusions reached by Ms. Ringenbach as to the cause of that market failure or the comparison between the small volume market and the transport program.

RESPONSE:

9. Referring to the discussion of the supplier of last resort function that begins on page 12 of Ms. Ringenbach's testimony, identify and produce any study, evaluation, or analysis, including workpapers, that supports and/or forms the basis of the discussion of the approaches taken in Ohio, Georgia, New York, Michigan, New Jersey, and Texas.

RESPONSE:

10. Referring to the discussion of the purchase of accounts receivable and consolidated billing that begins on page 15 of Ms. Ringenbach's testimony, identify and produce any study, evaluation, or analysis, including workpapers, that supports and/or forms the basis of the discussion of the approaches taken in Illinois, Pennsylvania, Texas and any other states that allow competition in gas supply.

RESPONSE:

11. Referring to the discussion of stranded costs and uncollectibles that begins on page 18 of Ms. Ringenbach's testimony, identify and produce any study, evaluation, or analysis, including workpapers, that supports and/or forms the basis of the discussion of the approaches taken in other states.

RESPONSE:

12. Referring to the discussion of system integrity and pipeline storage capacity that begins on page 20 of Ms. Ringenbach's testimony, identify and produce any study, evaluation, or analysis, including workpapers, that supports and/or forms the basis of the discussion of the approaches taken in other states.

RESPONSE:

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.



Rocco O. D'Ascenzo

Senior Counsel

Duke Energy Kentucky, Inc.

139 East Fourth Street, Rm 25 ATII

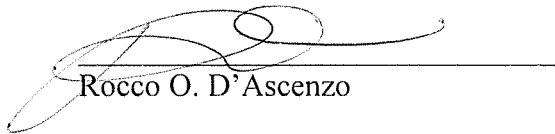
Cincinnati, Ohio 45201-0960

Phone: (513) 419-1843 /Fax: (513) 419-1846

e-mail: rocco.dascenzo@duke-energy.com

CERTIFICATE OF SERVICE

I certify that a copy of the attached Requests for Information to RESA on behalf of Duke Energy Kentucky, Inc. has been served by UPS overnight mail to the following parties on this 14th day of July, 2010.



Rocco O. D'Ascenzo

Paul D. Adams
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601

Honorable Lisa Kilkelly
Attorney at Law
Legal Aid Society
416 West Muhammad Ali Blvd.
Suite 300
Louisville, KY 40202

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

Lonnie E. Bellar
VP – State Regulations and
Louisville Gas and Electric
220 W. Main Street
P.O. Box 32010
Louisville, KY 40202

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. 14241
Lexington, KY 40512-4241

Honorable Matthew R. Malone
Attorney at Law
Hurt, Crosbie & May PLLC The Equus
Building
127 West Main Street
Lexington, KY 40507
Mark Martin
VP Rates & Regulatory Affairs
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

John B. Park
Katherine Y. Yunker
Yunker & Park, PLC
P. O. Box 21784
Lexington, KY 40522-1784
Iris G. Skidmore
415 W. Main Street, Suite 2
Frankfort, KY 40601

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

Rocco D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East 4th Street, R. 25 At II
P.O. box 960
Cincinnati, OH 45201
Honorable John M. Dosker
General Counsel
Stand Energy Corporation
1077 Celestial Street
Building 3, Suite 110
Cincinnati, OH 45202-1629
Trevor L. Earl
Reed Weitkamp Schell & Vice PLLC
500 West Jefferson Street
Suite 2400
Louisville, KY 40202-2812
Thomas J. FitzGerald
Counsel & Director
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KY 40602

RECEIVED

JUL 15 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)

DUKE ENERGY KENTUCKY, INC.'S REQUESTS FOR INFORMATION TO THE STAND
ENERGY CORPORATION

Now comes Duke Energy Kentucky, Inc., and submits its Requests for information to the Stand Energy Corp. ("Stand Energy"), to be answered by the date specified in the Commission's Order and in accord with the following:

For purpose of these discovery requests, the following terms shall have meanings set forth below:

(1) As used herein, "document", "documentation" and/or "record", whether stated as the singular or the plural, means any course of binders, book, pamphlet, periodical, letter, correspondence, memoranda, including but not limited to, any memorandum or report of a meeting or telephone or other conversation, invoice, account, credit memo, debit memo, financial statement, general ledger, ledger, journal, work papers, account work papers, report, diary, telegram, record, contract, agreement, study, draft, telex, handwritten or other note, sketch, picture, photograph, plan, chart, paper, graph, index, tape, data processing card, data processing disc, data cells or sheet, check acceptance draft, e-mail, studies, analyses, contracts, estimates, summaries, statistical statements, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of accountants, trade letters, comparisons, brochures, pamphlets, circulars, bulletins, notices, forecasts, electronic communication, printouts, all other data compilations from which information can be obtained (translated if necessary by defendants into usable form), any preliminary versions, drafts or revisions of any of the foregoing, and/or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced and regardless of origin or location, in the possession, custody and/or control of the defendant and/or their agents, accountants, employees, representatives and/or attorneys. "Document" and "record" also mean all copies of documents by whatever means made, if the copy bears any other markings or notations not found on the original.

(2) The terms "relating to", "referring to", "referred to", "pertaining to", "pertained to" and "relates to" means referring to, reporting, embodying, establishing, evidencing, comprising, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, presenting and/or constituting and/or in any way involving.

(3) The terms “and”, “or”, and “and/or” within the meaning of this document shall include each other and shall be both inclusive and disjunctive and shall be construed to require production of all documents, as above-described, in the broadest possible fashion and manner.

(4) To “identify” shall mean:

(a) With respect to a document, to state its date, its author, its type (for example, letter, memorandum, chart, photograph, sound reproduction, etc.), its subject matter, its present location and the name of its present custodian. The document may be produced in lieu of supplying the foregoing information. For each document which contains information as privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

(b) With regard to a natural person, to state his or her full name, last known employer or business affiliation, title and last known home address.

(c) With regard to a person other than a natural person, state the title of that person, any trade name, or corporate name or partnership name used by that person, and the principal business address of that person.

(5) To “produce” or to “identify and produce”, shall mean that Stand Energy shall produce each document or other requested tangible thing. For each tangible thing which Stand Energy contends are privileged or otherwise excludable from discovery, there shall be included a statement as to the basis for such claim of privilege or other grounds for exclusion.

Respectfully submitted,

DUKE ENERGY KENTUCKY, INC.



Rocco O. D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East Fourth Street, Rm 25 ATII
Cincinnati, Ohio 45201-0960
Phone: (513) 419-1843 /Fax: (513) 419-1846
e-mail: rocco.dascenzo@duke-energy.com

REQUESTS FOR INFORMATION

1. Please provide copies of any and all studies, analysis, reports, or articles including work papers, authored by Stand Witness Don Mason regarding gas retail choice for the last five years.

RESPONSE:

2. Please provide the study, analysis, including work papers to support Mr. Mason's claim that the Commonwealth has saved over \$1,380,000 over what they would have otherwise paid if they had purchased gas supplies from Columbia Gas of Kentucky.

RESPONSE:

3. Referring to page 4, lines 11-21, of Mr. Mason's testimony, please identify the hospitals, drycleaners, car dealerships, school administrators and array of businesses in Kentucky that Mr. Mason has discussed gas choice, and describe the nature of those conversations and the substance of the information Mr. Mason conveys during those conversations.

RESPONSE:

4. Referring to page 8 of Mr. Mason's testimony, has Mr. Mason performed any cost of service study that shows Duke Energy Kentucky's administrative charge is not reflective of its actual costs of providing the services associated with administering its transportation service? If the response is in the affirmative, please provide a copy of such study, including work papers.

RESPONSE:

5. Referring to page 8 of Mr. Mason's testimony, has Mr. Mason performed any cost study or analysis, or authored any reports that compare the cost structure of Duke Energy Ohio's gas operations to Duke Energy Kentucky's gas operations? If the response is in the affirmative, please provide such studies, reports or analysis, including all work papers. If the response is in the negative, on what basis does Mr. Mason contend that Duke Energy Ohio and Duke Energy Kentucky have identical natural gas operational cost structures thereby supporting his claim that Duke Energy Kentucky's administrative charge is unreasonable?

RESPONSE:

6. Referring to page 3 of Mr. Ward's Direct testimony where he discusses the purpose of his testimony as to "address the needs for changes in Local Distribution Company tariffs that will allow governmental facilities, schools, and business entities in Kentucky the option to purchase their own gas supplies from the competitive market," based upon this description, is Stand Energy not interested in providing gas service to residential customers? Please explain.

RESPONSE

7. Referring to page 4 of Mr. Ward's testimony where he defines gas transportation service, is Mr. Ward distinguishing gas transportation from retail choice? Please explain the distinction.

RESPONSE:

8. Referring to page 5 of Mr. Ward's testimony, please provide the study report or analysis supporting the statement that Stand Energy has saved customers over \$1,380,000 over what they have paid Columbia Gas of Kentucky.

RESPONSE:

9. Referring to page 7 of Mr. Ward's testimony, has Mr. Ward performed any cost of service study that shows Duke Energy Kentucky's administrative charge is not reflective of its actual costs of providing the services associated with administering its transportation service? If the response is in the affirmative, please provide a copy of such study, including work papers.

RESPONSE:

10. Referring to page 8 of Mr. Ward's testimony, has Mr. Ward performed any cost study or analysis, or authored any reports that compare the cost structure of Duke Energy Ohio's gas operations to Duke Energy Kentucky's gas operations? If the response is in the affirmative, please provide such studies, reports or analysis, including all work papers. If the response is in the negative, on what basis does Mr. Ward contend that Duke Energy Ohio and Duke Energy Kentucky have identical natural gas operational cost structures thereby supporting his claim that Duke Energy Kentucky's administrative charge is unreasonable?

RESPONSE:

11. Referring to page 5 of Mr. Dosker's testimony, please give examples of the types of retail rules for competitive subsidiaries of regulated utilities that Mr. Dosker believes the Kentucky Public Service Commission should develop.

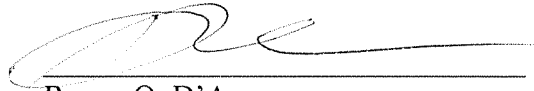
RESPONSE:

12. Referring to page 8, lines 5-8 of Mr. Dosker's testimony, please identify the predatory behavior he alleges Stand has observed by "most of Kentucky's regulated utilities." Please identify all support, facts, documents, and persons with knowledge of this accusation.

RESPONSE:

Respectfully submitted,


DUKE ENERGY KENTUCKY, INC.



Rocco O. D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East Fourth Street, Rm 25 ATII
Cincinnati, Ohio 45201-0960
Phone: (513) 419-1843 /Fax: (513) 419-1846
e-mail: rocco.dascenzo@duke-energy.com

CERTIFICATE OF SERVICE

I certify that a copy of the attached Requests for Information to Stand Energy on behalf of Duke Energy Kentucky, Inc. has been served by UPS overnight mail to the following parties on this 14th day of July, 2010:



Rocco O. D'Ascenzo

Paul D. Adams
Office of the Attorney General Utility &
Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601
Honorable Lisa Kilkelly
Attorney at Law
Legal Aid Society
416 West Muhammad Ali Blvd.
Suite 300
Louisville, KY 40202

Lonnie E. Bellar
VP – State Regulations and
Louisville Gas and Electric
220 W. Main Street
P.O. Box 32010
Louisville, KY 40202
John B. Brown
Chief Financial Officer, Treasurer
Delta Natural Gas Company, Inc.
3617 Lexington, Road
Winchester, Ky 40391

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

Honorable Matthew R. Malone
Attorney at Law
Hurt, Crosbie & May PLLC The Equus
Building
127 West Main Street
Lexington, KY 40507
Mark Martin
VP Rates & Regulatory Affairs
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

John B. Park
Katherine Y. Yunker
Yunker & Park, PLC
P. O. Box 21784
Lexington, KY 40522-1784
Iris G. Skidmore
415 W. Main Street, Suite 2
Frankfort, KY 40601

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

Judy Cooper
Manager, Regulatory Services
Colombia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. 14241
Lexington, KY 40512-4241
Rocco D'Ascenzo
Senior Counsel
Duke Energy Kentucky, Inc.
139 East 4th Street, R. 25 At II
P.O. box 960
Cincinnati, OH 45201
Honorable John M. Dosker
General Counsel
Stand Energy Corporation
1077 Celestial Street
Building 3, Suite 110
Cincinnati, OH 45202-1629
Trevor L. Earl
Reed Weitkamp Schell & Vice PLLC
500 West Jefferson Street
Suite 2400
Louisville, KY 40202-2812
Thomas J. FitzGerald
Counsel & Director
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KY 40602