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**PUBLIC SERVICE
COMMISSION**

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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

CASE NO. 2010-00146

**DATA REQUESTS OF LOUISVILLE GAS AND ELECTRIC COMPANY
TO STAND ENERGY CORPORATION**

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to Stand Energy Corporation (“Stand Energy”) to be answered by the date specified in the Kentucky Public Service Commission’s (“Commission”) procedural schedule order herein.

Instructions

As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to Stand Energy, its witnesses or counsel.

A. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if Stand Energy receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

C. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

E. If Stand Energy has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for LG&E as soon as possible.

F. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

G. In the event any document requested has been destroyed or transferred beyond the control of Stand Energy or any of its witnesses, state: the identity of the person by whom it was destroyed or transferred and 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 transferred by reason of a document retention policy, describe in detail the document retention policy.

H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer LG&E to the record where the document is located.

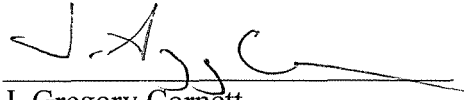
Data Requests

1. On unnumbered page 5 of 13 of Mark Ward's testimony, he states that "Stand Energy has served the Kentucky State Reformatory in Lagrange [sic] Kentucky which is served by Louisville Gas in [sic] Electric (LG&E). In the five years we have served this account the reformatory has saved \$522,000 over what they would have paid LG&E." For the period indicated by Stand Energy, please provide the following: (1) all supporting workpapers and all spreadsheets with formulas intact, data, and other documents showing in detail how the \$522,000 in claimed savings was calculated, and (2) a copy of all invoices rendered by Stand Energy to the Kentucky State Reformatory for natural gas service.

2. On unnumbered page 9 of 13 of Mark Ward's testimony, he states that "We also serve a large motel complex in the Louisville area.... Since January 2009 the account has saved close to \$35,000 over what they would have paid LG&E for tariff gas." For the period indicated by Stand Energy, please provide the following: (1) all supporting workpapers, and all spreadsheets with formulas intact, data and other documents showing in detail how the \$35,000 in claimed savings was calculated, and (2) a copy of all invoices rendered by Stand Energy to the motel complex for natural gas service.

Dated: July 15, 2010

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Gregory Cornett", written over a horizontal line.

J. Gregory Cornett
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Counsel for Louisville Gas and
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the following persons on the 15th day of July, 2010, by United States mail, postage prepaid:

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