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RECEIVED

JUL 15 2010

PUBLIC SERVICE
COMMISSION

July 15, 2010

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

Re: Case No. 2010-00146 - Requests For Information

Dear Mr. Derouen:

Enclosed for filing in the above-captioned matter with the Commission are ten (10) copies of Stand Energy Corporation's First Requests for Information to the regulated natural gas utilities that are parties to this case:

Atmos Energy Corporation
Columbia Gas of Kentucky, Inc.
Delta Natural Gas Company, Inc.
Duke Energy Kentucky, Inc.
Louisville Gas & Electric, Inc.

Thank you for your prompt attention to this filing.

Sincerely,

John M. Dosker
General Counsel

Encls.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 15 2010

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:)
AN INVESTIGATION OF NATURAL GAS) Case No. 2010-00146
RETAIL COMPETITION PROGRAMS)

**STAND ENERGY CORPORATION'S FIRST REQUESTS FOR INFORMATION
TO ATMOS ENERGY CORPORATION**

Intervenor, Stand Energy Corporation ("SEC"), by and through counsel, submits the following requests for information, pursuant to 807 KAR 5:001 for response from Atmos Energy Corporation ("Atmos") in accordance with the following definitions and instructions:

DEFINITIONS

1. "Affiliate" means, in relation to any Person, any entity controlled, directly or indirectly, by such Person, any entity that controls, directly or indirectly, such Person, or any entity directly or indirectly under common control with such Person. For this purpose, "control" of any entity or Person includes, but is not limited to, ownership of a majority of the voting power of the entity or Person or by contractual means or otherwise.
2. "Any" means each, every, and all Persons, Documents, Documentation, and Correspondence, places or things to which the term refers to or concerns.

3. "Communication(s)" means, but is not limited to, all forms of interaction or communication whether written, printed, oral, pictorial, electronic or by any other medium.
4. "PSC" or "Commission" refers to the Kentucky Public Service Commission, including its Members, Directors, personnel, employees and consultants.
5. "Staff" refers to the Staff of the Kentucky Public Service Commission.
6. "Consumer(s)" means all customers, end-users, and consumers, without limit, that receive at least natural gas distribution services from Atmos.
7. "Concerning" or "concerning" is used in its broadest sense when used with reference to a stated subject; "concerning" shall mean and include both of the following: (i) containing, comprising, constituting, stating, setting forth, recording, relating to, recording, including, negating or manifesting in any way, whether in whole or in part, that subject; and (ii) alluding to, describing, discussing, reflecting, interpreting, identifying, regarding, contradicting, referring to, or in any way pertaining to, whether in whole or in part, that subject.
8. "Correspondence(s)" means, without limiting its general meaning, all letters, telegrams, faxes, emails, notices, messages, memoranda and other written or electronic Communications.
9. "Document(s)" or "Documentation(s)" when used herein, means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody, or control regardless of where located; including without limiting the generality of the following: punchcards, printout sheets, movie film, slides, phonograph records, photographs, microfilm, video media, notes, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts, purchase

orders, checks and drafts, acknowledgments, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, correspondence, telegrams, drafts, discs or tapes, and computer produced interpretations thereof, instructions, announcements, schedules, price lists, electronic copies, and mechanical or electric sound recordings and transcripts thereof. In all cases, "Document(s)" or "Documentation(s)" shall also mean all written, printed, reproduced, recorded, typed, graphic, photographic, or electronic matter in your possession, custody, or control, including without limitation books, manuals, pamphlets, periodicals, correspondence, letters, memoranda, faxes, telegrams, electronic mail ("email") messages and attachments, reports, records, studies, transcripts, work papers, working papers, notes, charts, graphs, indices, data sheets, and all drafts thereof, and every copy of a document which contains handwritten or other notations not otherwise duplicated in the original or any other copy. In all cases, where originals and/or non-identical copies are not available, "Document(s)" or "Documentation(s)" shall also mean identical copies of original documents and copies of non-identical copies.

10. "Distribution Facilities" refers to equipment owned, operated, and/or controlled by CGK that is directly or indirectly related to or associated with its provision of natural gas distribution delivery and related services to Consumer(s), from the location of the equipment controlled by the Consumer and up to and including all the facilities, plant, and equipment that serve the Consumer.
11. "Identifications" or "Identify" or "Identity" or "Identified" when used herein shall mean that you are required to provide the requested information as the context requires it, and also, when used in reference to: (a) a natural individual, require you to state his or her full name, residential and business address, business title(s), and the entity(s) that the Person works for and/or worked

for at the time of the transaction or activity inquired into and at the time of the inquiry; (b) a corporation, require you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the type of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a Document or Documentation, require you to state the number of pages and the nature of the document (for example and without limitation, letter or memorandum, its title, its date, the name or names of its authors and recipients, and its present location and custodian, and whether or not it is claimed that such document is privileged and, if so, the type of privilege claimed and a statement of all the circumstances which will be relied on to support such claim of privilege; (e) Correspondence(s), to identify the Document(s) and/or Documentation(s) which refer to or evidence the Correspondence; (f) Communication, if written, to identify the Document(s) or Documentation(s) which refer to or evidence the Communication, and to the extent engaged in orally or otherwise, to provide the date, manner, place, and substance of the Communication.

12. "Load" means the consumption of Consumers that received and/or are currently receiving local distribution service (whether standard-offer or otherwise) from the local distribution company.

13. "Person(s)" includes any natural person, corporate entity, firm, partnership, association, joint venture, cooperative, municipality, city, county, irrigation district, drainage district or other special district or political subdivision, or federal, state or local governmental body,

department, or agency, entity or group of persons, unless the context clearly indicates that only an individual person is referred to.

14. "Pool" means a group of Consumers that take or receive service from a single provider that have been joined together, for Any particular purpose, with other Consumers taking or receiving from that same provider.
15. "Studies" means without limitation reports, analyses, studies, investigations, reviews, summaries, audits, forecasts, opinions, opinion Documents, justification Documents, and all drafts and prior versions of such Documents.
16. "Supplier" means without limitation, a marketer, supplier, alternate commodity supplier, capacity, supply, and/or commodity management provider, Pool operator, aggregator, or governmental aggregator but does not include system supply unless specifically requested.
17. "You" or "Your" or "Yourself" refers to the party to which or whom these discovery requests are directed, including all Affiliates, joint partnerships, corporate parents, subsidiaries, departments, divisions, officers, agents, consultants, employees, contractors, predecessors, successors and assigns, whether present or former.

INSTRUCTIONS FOR ANSWERING

1. Each response, document or objection should be immediately preceded by the corresponding request or sub-request to which it responds.
2. Each response must be supplemented by timely amendments if subsequent information renders any response incorrect in any material respect.
3. For each response, please identify the individual who prepared the response or the person(s) under whose supervision the response was prepared.

4. For these responses, please provide an oath or certification that the responses are true and accurate to the best of the preparer's knowledge, information and belief after reasonable inquiry.
5. Each request shall be deemed continuing in nature and must be updated immediately upon receipt of any new, further or different information that is responsive to the request.
6. With respect to any request consisting of separate parts or subparts, a complete response to each subpart is required as if the subpart were set forth as a separate request.
7. If any request cannot be answered in full after reasonable inquiry, please provide the response to the extent available, state why the request cannot be answered in full, and provide any information within your knowledge concerning the description, existence, availability, and custody of any unanswered portions.
8. In responding to these requests, please provide information from all files in the possession of, owned by, controlled by, or accessible to you, as well as all files maintained or controlled by officers, employees, agents or consultants or other representatives of your organization.
9. If no information or document is responsive to any request, please so state in the response.
10. If any document requested is not in your possession but you know or believe it to exist, please so state and identify to the best of your ability the last known location of the document and its custodian.
11. If any document requested or related to any request has been destroyed or discarded, please state the date the document was destroyed, the person or entity responsible for its destruction, the reason for its destruction, and provide a description of the contents of the document.
12. If any information or Documentation is not available in the exact form requested, please provide any available information or documents that best respond to the request.

13. For any information or Documents maintained by computer or data storage mechanism, please state the name of the file from which the information came, how the data is stored (CD, diskette, tape, etc.), the computer or media program in which it is stored, the name of the Person who collected or entered the information, and how the Document or information can be transmitted and retrieved.
14. The singular form of a word shall be interpreted as plural, and the plural form as singular, to the extent appropriate in order to respond to the scope of these requests and to make the request inclusive rather than exclusive.
15. “And” and “or” shall be construed either disjunctively or conjunctively as appropriate to respond to the scope of these requests.
16. Any objection to a request should provide a list of all information or documents withheld, describe the character and specific subject matter of the information withheld, including a description of the number of documents withheld and a summary of the information contained in such documents, and should clearly state the specific objection asserted and the grounds on which the objection is based.

REQUESTS FOR INFORMATION

Stand - All LDC's 1-1:

With regard to your transportation tariffs. Please answer the following:

- A. Does it cost you more to deliver third party or supplier natural gas to a customer compared to the cost to deliver natural gas to a sales customer of the same size? If so, explain why in detail.
- B. Discuss whether you believe daily balancing or monthly balancing should be required of transportation customers and explain why, in detail.
- C. Excluding periods of OFO's and OMO's, please identify the financial harm to your firm sales customers that has occurred over the past 12 months because of daily imbalances of transportation customers?
- D. During the past 12 months, please identify each day when transportation customers' deliveries provided a financial credit or system benefit to firm sales customers?
- E. If you believe that larger transportation consumers should be subject to daily balancing and smaller transportation consumers subject to monthly balancing explain how you determine the amount of daily or monthly usage that requires daily or monthly balancing and explain.
- F. If there are charges for imbalances or penalties for imbalances describe and explain the reasoning for the penalties and describe the allocation of the generated imbalance penalty dollars.
- G. Identify any operational events that have occurred that caused you to determine that daily or monthly balancing is necessary. Provide sufficient event details to justify a decision based thereon.
- H. Discuss whether or not you believe that supplier "pooling" should be allowed by Kentucky natural gas utilities to allow suppliers to pool deliveries for balancing and penalty avoidance

purposes. If not, explain in detail why not.

- I. Discuss the necessity for each penalty set forth in your transportation tariffs and the reasons underlying each of the penalty amounts.
- J. Identify and briefly explain the allocation of the generated penalty dollars.

Stand - All LDC's 1-2:

With regard to your operations pursuant to currently approved PSC tariffs, please respond to the following:

- A. For the period covering the past 24 months, identify the dates and duration of all operational flow orders, operational matching orders or other flow orders imposed by you.
- B. For all flow orders identified in (A) above, list the reason the flow order was imposed.

Stand - All LDC's 1-3:

With regard to your operations pursuant to currently approved tariffs, please respond to the following:

- A. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Supplier? If so, identify any such waiver and the Supplier that received the waiver.
- B. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Affiliate? If yes, identify any such waiver and the Affiliate that received the waiver.
- C. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any consumer? If so, identify any such waiver and the consumer that received the waiver.

Stand - All LDC's 1-4:

With respect to the total gas load served by you, please respond to the following:

- A. Of the total load served by you, (i) Identify the quantity/extent of this load that is served by commodity that you obtain from any affiliate, (ii) Identify each affiliate from whom you obtain the commodity identified in (i) above; and, (ii) for the period covering the past 24 months, identify the quantity/extent of the commodity that you obtained from the Affiliate(s) identified in (ii) above.

Stand - All LDC's 1-5:

With regard to your relationship with an unregulated Marketing Affiliate, if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Marketing Affiliate. .
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify the total revenues generated by your Marketing Affiliate under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-6:

With regard to your relationship with an "Asset Manager", if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Asset Manager.
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify both the total revenues paid to your Asset Manager and the total revenues received from your Asset Manager under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-7:

Relative to your pipeline delivery requirements, please respond to the following:

- A. During the past 2 years, with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any supplier? If so, identify and fully describe any such waiver and/or alteration, and the supplier.
- B. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any consumer or customer? If so, identify and fully describe any such waiver and/or alteration, and the

consumer/customer.

- C. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for your Gas Marketing Affiliate, if any? If so, identify and fully describe any such waiver and/or alteration, and the Affiliate.

Stand - All LDC's 1-8

Please respond to the following:

- A. Identify any item or document that you intend to or desire to use, refer to, rely on, sponsor, and/or introduce as evidence in the hearing in this matter(s).

Stand - Atmos 1-9:

- A. Please provide the number of transportation customers on your Atmos-Kentucky distribution system
- B. How many of the transportation customers described above are supplied commodity by your unregulated Affiliate, Atmos Energy Marketing?
- C. How much of your total natural gas load is produced in Kentucky?
- D. In Mr. Martin's testimony, page 13, lines 11-14, he indicates a volumetric threshold of 9,000 Mcf is needed to qualify for transportation and that below that volume a customer could not achieve savings. Should whether or not "a customer can achieve savings" be Atmos's arbitrary decision to make for customers or should customers be able to make that evaluation and decision?

- E. Do you allow your unregulated marketing affiliate to use reserved pipeline capacity (owned by you and paid for by your ratepayers) to deliver gas to the Transportation customers of your unregulated marketing affiliate on the Atmos system? Is the price paid by Atmos Energy Marketing discounted? If so, by how much?
- F. Do you allow your unregulated marketing affiliate to use reserved pipeline capacity (owned by you and paid for by your ratepayers) to deliver gas to the Transportation customers of your unregulated marketing affiliate on any other local distribution system? Is the price paid by Atmos Energy Marketing discounted? If so, by how much?

CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's First Set of Information Requests to Atmos Energy Corporation were served upon the following parties of record via U.S. Mail postage prepaid on July 15, 2010.

Ms. Judy Cooper
Manager, Regulatory Services
Columbia Gas of Kentucky, Inc.
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P.O. Box 14241
Lexington, KY 40512-4241

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Lexington, Kentucky 40507-1320
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Senior Counsel
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Cincinnati, Ohio 45201

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V.P. State Regulation
Louisville Gas & Electric Company
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P.O. Box 32010
Louisville, Kentucky 40202

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Chief Financial Officer, Treasurer
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V.P. Rates & Regulatory Affairs
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Suite 2200
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Counsel for Proliance

Katherine K. Yunker, Esq.
John B. Park, Esq.
Yunker & Park, PLC
P.O. Box 21784
Lexington, Kentucky 40522-1784
Counsel for ProLiance & RESA


JOHN M. DOSKER

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 15 2010

IN THE MATTER OF:)

PUBLIC SERVICE
COMMISSION

AN INVESTIGATION OF NATURAL GAS)

Case No. 2010-00146

RETAIL COMPETITION PROGRAMS)

STAND ENERGY CORPORATION'S FIRST REQUESTS FOR INFORMATION
TO COLUMBIA GAS OF KENTUCKY, INC.

Intervenor, Stand Energy Corporation ("SEC"), by and through counsel, submits the following requests for information, pursuant to 807 KAR 5:001 for response from Columbia Gas of Kentucky, Inc. ("CGK") in accordance with the following definitions and instructions:

DEFINITIONS

1. "Affiliate" means, in relation to any Person, any entity controlled, directly or indirectly, by such Person, any entity that controls, directly or indirectly, such Person, or any entity directly or indirectly under common control with such Person. For this purpose, "control" of any entity or Person includes, but is not limited to, ownership of a majority of the voting power of the entity or Person or by contractual means or otherwise.
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orders, checks and drafts, acknowledgments, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, correspondence, telegrams, drafts, discs or tapes, and computer produced interpretations thereof, instructions, announcements, schedules, price lists, electronic copies, and mechanical or electric sound recordings and transcripts thereof. In all cases, "Document(s)" or "Documentation(s)" shall also mean all written, printed, reproduced, recorded, typed, graphic, photographic, or electronic matter in your possession, custody, or control, including without limitation books, manuals, pamphlets, periodicals, correspondence, letters, memoranda, faxes, telegrams, electronic mail ("email") messages and attachments, reports, records, studies, transcripts, work papers, working papers, notes, charts, graphs, indices, data sheets, and all drafts thereof, and every copy of a document which contains handwritten or other notations not otherwise duplicated in the original or any other copy. In all cases, where originals and/or non-identical copies are not available, "Document(s)" or "Documentation(s)" shall also mean identical copies of original documents and copies of non-identical copies.

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for at the time of the transaction or activity inquired into and at the time of the inquiry; (b) a corporation, require you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the type of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a Document or Documentation, require you to state the number of pages and the nature of the document (for example and without limitation, letter or memorandum, its title, its date, the name or names of its authors and recipients, and its present location and custodian, and whether or not it is claimed that such document is privileged and, if so, the type of privilege claimed and a statement of all the circumstances which will be relied on to support such claim of privilege; (e) Correspondence(s), to identify the Document(s) and/or Documentation(s) which refer to or evidence the Correspondence; (f) Communication, if written, to identify the Document(s) or Documentation(s) which refer to or evidence the Communication, and to the extent engaged in orally or otherwise, to provide the date, manner, place, and substance of the Communication.

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10. If any document requested is not in your possession but you know or believe it to exist, please so state and identify to the best of your ability the last known location of the document and its custodian.
11. If any document requested or related to any request has been destroyed or discarded, please state the date the document was destroyed, the person or entity responsible for its destruction, the reason for its destruction, and provide a description of the contents of the document.
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REQUESTS FOR INFORMATION

Stand - All LDC's 1-1:

With regard to your transportation tariffs. Please answer the following:

- A. Does it cost you more to deliver third party or supplier natural gas to a customer compared to the cost to deliver natural gas to a sales customer of the same size? If so, explain why in detail.
- B. Discuss whether you believe daily balancing or monthly balancing should be required of transportation customers and explain why, in detail.
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- F. If there are charges for imbalances or penalties for imbalances describe and explain the reasoning for the penalties and describe the allocation of the generated imbalance penalty dollars.
- G. Identify any operational events that have occurred that caused you to determine that daily or monthly balancing is necessary. Provide sufficient event details to justify a decision based thereon.
- H. Discuss whether or not you believe that supplier "pooling" should be allowed by Kentucky natural gas utilities to allow suppliers to pool deliveries for balancing and penalty avoidance

purposes. If not, explain in detail why not.

- I. Discuss the necessity for each penalty set forth in your transportation tariffs and the reasons underlying each of the penalty amounts.
- J. Identify and briefly explain the allocation of the generated penalty dollars.

Stand - All LDC's 1-2:

With regard to your operations pursuant to currently approved PSC tariffs, please respond to the following:

- A. For the period covering the past 24 months, identify the dates and duration of all operational flow orders, operational matching orders or other flow orders imposed by you.
- B. For all flow orders identified in (A) above, list the reason the flow order was imposed.

Stand - All LDC's 1-3:

With regard to your operations pursuant to currently approved tariffs, please respond to the following:

- A. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Supplier? If so, identify any such waiver and the Supplier that received the waiver.
- B. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Affiliate? If yes, identify any such waiver and the Affiliate that received the waiver.
- C. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any consumer? If so, identify any such waiver and the consumer that received the waiver.

Stand - All LDC's 1-4:

With respect to the total gas load served by you, please respond to the following:

- A. Of the total load served by you, (i) Identify the quantity/extent of this load that is served by commodity that you obtain from any affiliate, (ii) Identify each affiliate from whom you obtain the commodity identified in (i) above; and, (iii) for the period covering the past 24 months, identify the quantity/extent of the commodity that you obtained from the Affiliate(s) identified in (ii) above.

Stand - All LDC's 1-5:

With regard to your relationship with an unregulated Marketing Affiliate, if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Marketing Affiliate. .
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify the total revenues generated by your Marketing Affiliate under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-6:

With regard to your relationship with an "Asset Manager", if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Asset Manager.
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify both the total revenues paid to your Asset Manager and the total revenues received from your Asset Manager under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-7:

Relative to your pipeline delivery requirements, please respond to the following:

- A. During the past 2 years, with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any supplier? If so, identify and fully describe any such waiver and/or alteration, and the supplier.
- B. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any consumer or customer? If so, identify and fully describe any such waiver and/or alteration, and the consumer/customer.

C. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for your Gas Marketing Affiliate, if any? If so, identify and fully describe any such waiver and/or alteration, and the Affiliate.

Stand - All LDC's 1-8

Please respond to the following:

A. Identify any item or document that you intend to or desire to use, refer to, rely on, sponsor, and/or introduce as evidence in the hearing in this matter(s).

Stand - Columbia 1-9:

Please answer the following questions:

- A. What percentage of your system gas supplies are produced in Kentucky?
- B. What percentage of your system gas supplies are produced in the Appalachian area?
- C. What percentage of your system gas supplies are transported on the Columbia Gulf system?
- D. Please provide any studies that were done to establish a threshold of 25,000 Mcf/yr or greater to qualify for Delivery Service.
- E. Please explain why Columbia Gas of Kentucky has a much higher threshold for transportation service than their sister Columbia distribution companies in Ohio, Pennsylvania, Maryland and Virginia.
- F. In your Small Volume Gas Transportation Service (SVGTS) program, a supplier supplying gas to facilities in Frankfort Kentucky must deliver their supplies to the

Portsmouth, Ohio receipt point (PSP 17-15). This receipt point, in addition to requiring backhaul" to the Columbia of Kentucky service territory, has a BTU factor of approximately 1.131. Deliveries under the Delivery Service rate schedule for larger facilities in Frankfort must be delivered to PSP 18-10 which has an approximate BTU factor of 1.02. The result is that the SVGTS customers must pay an additional 10-11% more for gas each month. Please explain the reason for this policy.

CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's First Set of Information Requests to Columbia Gas of Kentucky, Inc. were served upon the following parties of record via U.S. Mail postage prepaid on July 15, 2010.

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JOHN M. DOSKER

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 15 2010

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:)
AN INVESTIGATION OF NATURAL GAS) Case No. 2010-00146
RETAIL COMPETITION PROGRAMS)

STAND ENERGY CORPORATION'S FIRST REQUESTS FOR INFORMATION
TO DELTA NATURAL GAS COMPANY, INC.

Intervenor, Stand Energy Corporation ("SEC"), by and through counsel, submits the following requests for information, pursuant to 807 KAR 5:001 for response from Delta Natural Gas Company, Inc. ("Delta") in accordance with the following definitions and instructions:

DEFINITIONS

1. "Affiliate" means, in relation to any Person, any entity controlled, directly or indirectly, by such Person, any entity that controls, directly or indirectly, such Person, or any entity directly or indirectly under common control with such Person. For this purpose, "control" of any entity or Person includes, but is not limited to, ownership of a majority of the voting power of the entity or Person or by contractual means or otherwise.
2. "Any" means each, every, and all Persons, Documents, Documentation, and Correspondence, places or things to which the term refers to or concerns.

3. "Communication(s)" means, but is not limited to, all forms of interaction or communication whether written, printed, oral, pictorial, electronic or by any other medium.
4. "PSC" or "Commission" refers to the Kentucky Public Service Commission, including its Members, Directors, personnel, employees and consultants.
5. "Staff" refers to the Staff of the Kentucky Public Service Commission.
6. "Consumer(s)" means all customers, end-users, and consumers, without limit, that receive at least natural gas distribution services from Atmos.
7. "Concerning" or "concerning" is used in its broadest sense when used with reference to a stated subject; "concerning" shall mean and include both of the following: (i) containing, comprising, constituting, stating, setting forth, recording, relating to, recording, including, negating or manifesting in any way, whether in whole or in part, that subject; and (ii) alluding to, describing, discussing, reflecting, interpreting, identifying, regarding, contradicting, referring to, or in any way pertaining to, whether in whole or in part, that subject.
8. "Correspondence(s)" means, without limiting its general meaning, all letters, telegrams, faxes, emails, notices, messages, memoranda and other written or electronic Communications.
9. "Document(s)" or "Documentation(s)" when used herein, means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody, or control regardless of where located; including without limiting the generality of the following: punchcards, printout sheets, movie film, slides, phonograph records, photographs, microfilm, video media, notes, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts, purchase

orders, checks and drafts, acknowledgments, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, correspondence, telegrams, drafts, discs or tapes, and computer produced interpretations thereof, instructions, announcements, schedules, price lists, electronic copies, and mechanical or electric sound recordings and transcripts thereof. In all cases, "Document(s)" or "Documentation(s)" shall also mean all written, printed, reproduced, recorded, typed, graphic, photographic, or electronic matter in your possession, custody, or control, including without limitation books, manuals, pamphlets, periodicals, correspondence, letters, memoranda, faxes, telegrams, electronic mail ("email") messages and attachments, reports, records, studies, transcripts, work papers, working papers, notes, charts, graphs, indices, data sheets, and all drafts thereof, and every copy of a document which contains handwritten or other notations not otherwise duplicated in the original or any other copy. In all cases, where originals and/or non-identical copies are not available, "Document(s)" or "Documentation(s)" shall also mean identical copies of original documents and copies of non-identical copies.

10. "Distribution Facilities" refers to equipment owned, operated, and/or controlled by CGK that is directly or indirectly related to or associated with its provision of natural gas distribution delivery and related services to Consumer(s), from the location of the equipment controlled by the Consumer and up to and including all the facilities, plant, and equipment that serve the Consumer.
11. "Identifications" or "Identify" or "Identity" or "Identified" when used herein shall mean that you are required to provide the requested information as the context requires it, and also, when used in reference to: (a) a natural individual, require you to state his or her full name, residential and business address, business title(s), and the entity(s) that the Person works for and/or worked

for at the time of the transaction or activity inquired into and at the time of the inquiry; (b) a corporation, require you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the type of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a Document or Documentation, require you to state the number of pages and the nature of the document (for example and without limitation, letter or memorandum, its title, its date, the name or names of its authors and recipients, and its present location and custodian, and whether or not it is claimed that such document is privileged and, if so, the type of privilege claimed and a statement of all the circumstances which will be relied on to support such claim of privilege; (e) Correspondence(s), to identify the Document(s) and/or Documentation(s) which refer to or evidence the Correspondence; (f) Communication, if written, to identify the Document(s) or Documentation(s) which refer to or evidence the Communication, and to the extent engaged in orally or otherwise, to provide the date, manner, place, and substance of the Communication.

12. "Load" means the consumption of Consumers that received and/or are currently receiving local distribution service (whether standard-offer or otherwise) from the local distribution company.

13. "Person(s)" includes any natural person, corporate entity, firm, partnership, association, joint venture, cooperative, municipality, city, county, irrigation district, drainage district or other special district or political subdivision, or federal, state or local governmental body,

department, or agency, entity or group of persons, unless the context clearly indicates that only an individual person is referred to.

14. "Pool" means a group of Consumers that take or receive service from a single provider that have been joined together, for Any particular purpose, with other Consumers taking or receiving from that same provider.
15. "Studies" means without limitation reports, analyses, studies, investigations, reviews, summaries, audits, forecasts, opinions, opinion Documents, justification Documents, and all drafts and prior versions of such Documents.
16. "Supplier" means without limitation, a marketer, supplier, alternate commodity supplier, capacity, supply, and/or commodity management provider, Pool operator, aggregator, or governmental aggregator but does not include system supply unless specifically requested.
17. "You" or "Your" or "Yourself" refers to the party to which or whom these discovery requests are directed, including all Affiliates, joint partnerships, corporate parents, subsidiaries, departments, divisions, officers, agents, consultants, employees, contractors, predecessors, successors and assigns, whether present or former.

INSTRUCTIONS FOR ANSWERING

1. Each response, document or objection should be immediately preceded by the corresponding request or sub-request to which it responds.
2. Each response must be supplemented by timely amendments if subsequent information renders any response incorrect in any material respect.
3. For each response, please identify the individual who prepared the response or the person(s) under whose supervision the response was prepared.

4. For these responses, please provide an oath or certification that the responses are true and accurate to the best of the preparer's knowledge, information and belief after reasonable inquiry.
5. Each request shall be deemed continuing in nature and must be updated immediately upon receipt of any new, further or different information that is responsive to the request.
6. With respect to any request consisting of separate parts or subparts, a complete response to each subpart is required as if the subpart were set forth as a separate request.
7. If any request cannot be answered in full after reasonable inquiry, please provide the response to the extent available, state why the request cannot be answered in full, and provide any information within your knowledge concerning the description, existence, availability, and custody of any unanswered portions.
8. In responding to these requests, please provide information from all files in the possession of, owned by, controlled by, or accessible to you, as well as all files maintained or controlled by officers, employees, agents or consultants or other representatives of your organization.
9. If no information or document is responsive to any request, please so state in the response.
10. If any document requested is not in your possession but you know or believe it to exist, please so state and identify to the best of your ability the last known location of the document and its custodian.
11. If any document requested or related to any request has been destroyed or discarded, please state the date the document was destroyed, the person or entity responsible for its destruction, the reason for its destruction, and provide a description of the contents of the document.
12. If any information or Documentation is not available in the exact form requested, please provide any available information or documents that best respond to the request.

13. For any information or Documents maintained by computer or data storage mechanism, please state the name of the file from which the information came, how the data is stored (CD, diskette, tape, etc.), the computer or media program in which it is stored, the name of the Person who collected or entered the information, and how the Document or information can be transmitted and retrieved.
14. The singular form of a word shall be interpreted as plural, and the plural form as singular, to the extent appropriate in order to respond to the scope of these requests and to make the request inclusive rather than exclusive.
15. “And” and “or” shall be construed either disjunctively or conjunctively as appropriate to respond to the scope of these requests.
16. Any objection to a request should provide a list of all information or documents withheld, describe the character and specific subject matter of the information withheld, including a description of the number of documents withheld and a summary of the information contained in such documents, and should clearly state the specific objection asserted and the grounds on which the objection is based.

REQUESTS FOR INFORMATION

Stand - All LDC's 1-1:

With regard to your transportation tariffs. Please answer the following:

- A. Does it cost you more to deliver third party or supplier natural gas to a customer compared to the cost to deliver natural gas to a sales customer of the same size? If so, explain why in detail.
- B. Discuss whether you believe daily balancing or monthly balancing should be required of transportation customers and explain why, in detail.
- C. Excluding periods of OFO's and OMO's, please identify the financial harm to your firm sales customers that has occurred over the past 12 months because of daily imbalances of transportation customers?
- D. During the past 12 months, please identify each day when transportation customers' deliveries provided a financial credit or system benefit to firm sales customers?
- E. If you believe that larger transportation consumers should be subject to daily balancing and smaller transportation consumers subject to monthly balancing explain how you determine the amount of daily or monthly usage that requires daily or monthly balancing and explain.
- F. If there are charges for imbalances or penalties for imbalances describe and explain the reasoning for the penalties and describe the allocation of the generated imbalance penalty dollars.
- G. Identify any operational events that have occurred that caused you to determine that daily or monthly balancing is necessary. Provide sufficient event details to justify a decision based thereon.
- H. Discuss whether or not you believe that supplier "pooling" should be allowed by Kentucky natural gas utilities to allow suppliers to pool deliveries for balancing and penalty avoidance

purposes. If not, explain in detail why not.

- I. Discuss the necessity for each penalty set forth in your transportation tariffs and the reasons underlying each of the penalty amounts.
- J. Identify and briefly explain the allocation of the generated penalty dollars.

Stand - All LDC's 1-2:

With regard to your operations pursuant to currently approved PSC tariffs, please respond to the following:

- A. For the period covering the past 24 months, identify the dates and duration of all operational flow orders, operational matching orders or other flow orders imposed by you.
- B. For all flow orders identified in (A) above, list the reason the flow order was imposed.

Stand - All LDC's 1-3:

With regard to your operations pursuant to currently approved tariffs, please respond to the following:

- A. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Supplier? If so, identify any such waiver and the Supplier that received the waiver.
- B. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Affiliate? If yes, identify any such waiver and the Affiliate that received the waiver.
- C. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any consumer? If so, identify any such waiver and the consumer that received the waiver.

Stand - All LDC's 1-4:

With respect to the total gas load served by you, please respond to the following:

- A. Of the total load served by you, (i) Identify the quantity/extent of this load that is served by commodity that you obtain from any affiliate, (ii) Identify each affiliate from whom you obtain the commodity identified in (i) above; and, (ii) for the period covering the past 24 months, identify the quantity/extent of the commodity that you obtained from the Affiliate(s) identified in (ii) above.

Stand - All LDC's 1-5:

With regard to your relationship with an unregulated Marketing Affiliate, if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Marketing Affiliate. .
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify the total revenues generated by your Marketing Affiliate under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-6:

With regard to your relationship with an "Asset Manager", if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Asset Manager.
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify both the total revenues paid to your Asset Manager and the total revenues received from your Asset Manager under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-7:

Relative to your pipeline delivery requirements, please respond to the following:

- A. During the past 2 years, with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any supplier? If so, identify and fully describe any such waiver and/or alteration, and the supplier.
- B. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any consumer or customer? If so, identify and fully describe any such waiver and/or alteration, and the consumer/customer.

- C. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for your Gas Marketing Affiliate, if any? If so, identify and fully describe any such waiver and/or alteration, and the Affiliate.

Stand - All LDC's 1-8

Please respond to the following:

- A. Identify any item or document that you intend to or desire to use, refer to, rely on, sponsor, and/or introduce as evidence in the hearing in this matter(s).

Stand - Delta 1-9:

- A. How many of your customers are using transportation services from Delta?
- B. Of the number above, how many customers are using one of Delta's non-regulated Affiliates as their natural gas supplier?
- C. Are there any Delta employees that work in both the regulated and non-regulated segments of your company? If yes, please explain.
- D. Of your total 2009 natural gas sales, what percentage was from regulated sales? What percentage was from non-regulated sales?
- E. In Delta's 2009 Annual Report it is stated that 51% of your regulated gas supplies are purchased from M & B Gas Services (M&B), and 69% of your non-regulated gas supplies are purchased from M&B. Are these gas supplies purchased by the same personnel at Delta?

- F. Are both regulated and non-regulated gas supply purchases purchased under the same contract with M&B?
- F. What percentage of your regulated gas supplies are produced in Kentucky?
- G. What percentage of your non-regulated gas supplies are produced in Kentucky?
- H. In Delta Natural Gas Company's Kentucky PSC Case No. 2010-00116 you identified 2009 Special Contracts usage as 1,955,008 Mcf. What percentage of that volume is supplied by your non-regulated marketing affiliate?
- I. Do you allow your non-regulated marketing affiliate to use reserved pipeline capacity (owned by you and paid for by your ratepayers) to deliver gas to the Transportation customers of your unregulated marketing affiliate on your local distribution system? Is the price paid by Delta Natural Gas Marketing discounted? If so, by how much?

CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's First Set of Information Requests to Delta Natural Gas Company, Inc. were served upon the following parties of record via U.S. Mail postage prepaid on July 15, 2010.

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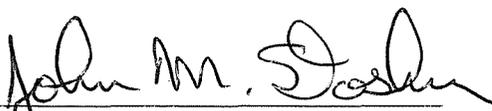
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JOHN M. DOSKER

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 15 2010

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:)
AN INVESTIGATION OF NATURAL GAS) Case No. 2010-00146
RETAIL COMPETITION PROGRAMS)

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

Intervenor, Stand Energy Corporation ("SEC"), by and through counsel, submits the following requests for information, pursuant to 807 KAR 5:001 for response from Duke Energy Kentucky, Inc. ("Duke") in accordance with the following definitions and instructions:

DEFINITIONS

1. "Affiliate" means, in relation to any Person, any entity controlled, directly or indirectly, by such Person, any entity that controls, directly or indirectly, such Person, or any entity directly or indirectly under common control with such Person. For this purpose, "control" of any entity or Person includes, but is not limited to, ownership of a majority of the voting power of the entity or Person or by contractual means or otherwise.
2. "Any" means each, every, and all Persons, Documents, Documentation, and Correspondence, places or things to which the term refers to or concerns.

3. "Communication(s)" means, but is not limited to, all forms of interaction or communication whether written, printed, oral, pictorial, electronic or by any other medium.
4. "PSC" or "Commission" refers to the Kentucky Public Service Commission, including its Members, Directors, personnel, employees and consultants.
5. "Staff" refers to the Staff of the Kentucky Public Service Commission.
6. "Consumer(s)" means all customers, end-users, and consumers, without limit, that receive at least natural gas distribution services from Atmos.
7. "Concerning" or "concerning" is used in its broadest sense when used with reference to a stated subject; "concerning" shall mean and include both of the following: (i) containing, comprising, constituting, stating, setting forth, recording, relating to, recording, including, negating or manifesting in any way, whether in whole or in part, that subject; and (ii) alluding to, describing, discussing, reflecting, interpreting, identifying, regarding, contradicting, referring to, or in any way pertaining to, whether in whole or in part, that subject.
8. "Correspondence(s)" means, without limiting its general meaning, all letters, telegrams, faxes, emails, notices, messages, memoranda and other written or electronic Communications.
9. "Document(s)" or "Documentation(s)" when used herein, means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody, or control regardless of where located; including without limiting the generality of the following: punchcards, printout sheets, movie film, slides, phonograph records, photographs, microfilm, video media, notes, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts, purchase

orders, checks and drafts, acknowledgments, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, correspondence, telegrams, drafts, discs or tapes, and computer produced interpretations thereof, instructions, announcements, schedules, price lists, electronic copies, and mechanical or electric sound recordings and transcripts thereof. In all cases, "Document(s)" or "Documentation(s)" shall also mean all written, printed, reproduced, recorded, typed, graphic, photographic, or electronic matter in your possession, custody, or control, including without limitation books, manuals, pamphlets, periodicals, correspondence, letters, memoranda, faxes, telegrams, electronic mail ("email") messages and attachments, reports, records, studies, transcripts, work papers, working papers, notes, charts, graphs, indices, data sheets, and all drafts thereof, and every copy of a document which contains handwritten or other notations not otherwise duplicated in the original or any other copy. In all cases, where originals and/or non-identical copies are not available, "Document(s)" or "Documentation(s)" shall also mean identical copies of original documents and copies of non-identical copies.

10. "Distribution Facilities" refers to equipment owned, operated, and/or controlled by CGK that is directly or indirectly related to or associated with its provision of natural gas distribution delivery and related services to Consumer(s), from the location of the equipment controlled by the Consumer and up to and including all the facilities, plant, and equipment that serve the Consumer.
11. "Identifications" or "Identify" or "Identity" or "Identified" when used herein shall mean that you are required to provide the requested information as the context requires it, and also, when used in reference to: (a) a natural individual, require you to state his or her full name, residential and business address, business title(s), and the entity(s) that the Person works for and/or worked

for at the time of the transaction or activity inquired into and at the time of the inquiry; (b) a corporation, require you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the type of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a Document or Documentation, require you to state the number of pages and the nature of the document (for example and without limitation, letter or memorandum, its title, its date, the name or names of its authors and recipients, and its present location and custodian, and whether or not it is claimed that such document is privileged and, if so, the type of privilege claimed and a statement of all the circumstances which will be relied on to support such claim of privilege; (e) Correspondence(s), to identify the Document(s) and/or Documentation(s) which refer to or evidence the Correspondence; (f) Communication, if written, to identify the Document(s) or Documentation(s) which refer to or evidence the Communication, and to the extent engaged in orally or otherwise, to provide the date, manner, place, and substance of the Communication.

12. "Load" means the consumption of Consumers that received and/or are currently receiving local distribution service (whether standard-offer or otherwise) from the local distribution company.

13. "Person(s)" includes any natural person, corporate entity, firm, partnership, association, joint venture, cooperative, municipality, city, county, irrigation district, drainage district or other special district or political subdivision, or federal, state or local governmental body,

department, or agency, entity or group of persons, unless the context clearly indicates that only an individual person is referred to.

14. "Pool" means a group of Consumers that take or receive service from a single provider that have been joined together, for Any particular purpose, with other Consumers taking or receiving from that same provider.
15. "Studies" means without limitation reports, analyses, studies, investigations, reviews, summaries, audits, forecasts, opinions, opinion Documents, justification Documents, and all drafts and prior versions of such Documents.
16. "Supplier" means without limitation, a marketer, supplier, alternate commodity supplier, capacity, supply, and/or commodity management provider, Pool operator, aggregator, or governmental aggregator but does not include system supply unless specifically requested.
17. "You" or "Your" or "Yourself" refers to the party to which or whom these discovery requests are directed, including all Affiliates, joint partnerships, corporate parents, subsidiaries, departments, divisions, officers, agents, consultants, employees, contractors, predecessors, successors and assigns, whether present or former.

INSTRUCTIONS FOR ANSWERING

1. Each response, document or objection should be immediately preceded by the corresponding request or sub-request to which it responds.
2. Each response must be supplemented by timely amendments if subsequent information renders any response incorrect in any material respect.
3. For each response, please identify the individual who prepared the response or the person(s) under whose supervision the response was prepared.

4. For these responses, please provide an oath or certification that the responses are true and accurate to the best of the preparer's knowledge, information and belief after reasonable inquiry.
5. Each request shall be deemed continuing in nature and must be updated immediately upon receipt of any new, further or different information that is responsive to the request.
6. With respect to any request consisting of separate parts or subparts, a complete response to each subpart is required as if the subpart were set forth as a separate request.
7. If any request cannot be answered in full after reasonable inquiry, please provide the response to the extent available, state why the request cannot be answered in full, and provide any information within your knowledge concerning the description, existence, availability, and custody of any unanswered portions.
8. In responding to these requests, please provide information from all files in the possession of, owned by, controlled by, or accessible to you, as well as all files maintained or controlled by officers, employees, agents or consultants or other representatives of your organization.
9. If no information or document is responsive to any request, please so state in the response.
10. If any document requested is not in your possession but you know or believe it to exist, please so state and identify to the best of your ability the last known location of the document and its custodian.
11. If any document requested or related to any request has been destroyed or discarded, please state the date the document was destroyed, the person or entity responsible for its destruction, the reason for its destruction, and provide a description of the contents of the document.
12. If any information or Documentation is not available in the exact form requested, please provide any available information or documents that best respond to the request.

13. For any information or Documents maintained by computer or data storage mechanism, please state the name of the file from which the information came, how the data is stored (CD, diskette, tape, etc.), the computer or media program in which it is stored, the name of the Person who collected or entered the information, and how the Document or information can be transmitted and retrieved.
14. The singular form of a word shall be interpreted as plural, and the plural form as singular, to the extent appropriate in order to respond to the scope of these requests and to make the request inclusive rather than exclusive.
15. “And” and “or” shall be construed either disjunctively or conjunctively as appropriate to respond to the scope of these requests.
16. Any objection to a request should provide a list of all information or documents withheld, describe the character and specific subject matter of the information withheld, including a description of the number of documents withheld and a summary of the information contained in such documents, and should clearly state the specific objection asserted and the grounds on which the objection is based.

REQUESTS FOR INFORMATION

Stand - All LDC's 1-1:

With regard to your transportation tariffs. Please answer the following:

- A. Does it cost you more to deliver third party or supplier natural gas to a customer compared to the cost to deliver natural gas to a sales customer of the same size? If so, explain why in detail.
- B. Discuss whether you believe daily balancing or monthly balancing should be required of transportation customers and explain why, in detail.
- C. Excluding periods of OFO's and OMO's, please identify the financial harm to your firm sales customers that has occurred over the past 12 months because of daily imbalances of transportation customers?
- D. During the past 12 months, please identify each day when transportation customers' deliveries provided a financial credit or system benefit to firm sales customers?
- E. If you believe that larger transportation consumers should be subject to daily balancing and smaller transportation consumers subject to monthly balancing explain how you determine the amount of daily or monthly usage that requires daily or monthly balancing and explain.
- F. If there are charges for imbalances or penalties for imbalances describe and explain the reasoning for the penalties and describe the allocation of the generated imbalance penalty dollars.
- G. Identify any operational events that have occurred that caused you to determine that daily or monthly balancing is necessary. Provide sufficient event details to justify a decision based thereon.
- H. Discuss whether or not you believe that supplier "pooling" should be allowed by Kentucky natural gas utilities to allow suppliers to pool deliveries for balancing and penalty avoidance

purposes. If not, explain in detail why not.

- I. Discuss the necessity for each penalty set forth in your transportation tariffs and the reasons underlying each of the penalty amounts.
- J. Identify and briefly explain the allocation of the generated penalty dollars.

Stand - All LDC's 1-2:

With regard to your operations pursuant to currently approved PSC tariffs, please respond to the following:

- A. For the period covering the past 24 months, identify the dates and duration of all operational flow orders, operational matching orders or other flow orders imposed by you.
- B. For all flow orders identified in (A) above, list the reason the flow order was imposed.

Stand - All LDC's 1-3:

With regard to your operations pursuant to currently approved tariffs, please respond to the following:

- A. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Supplier? If so, identify any such waiver and the Supplier that received the waiver.
- B. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Affiliate? If yes, identify any such waiver and the Affiliate that received the waiver.
- C. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any consumer? If so, identify any such waiver and the consumer that received the waiver.

Stand - All LDC's 1-4:

With respect to the total gas load served by you, please respond to the following:

- A. Of the total load served by you, (i) Identify the quantity/extent of this load that is served by commodity that you obtain from any affiliate, (ii) Identify each affiliate from whom you obtain the commodity identified in (i) above; and, (ii) for the period covering the past 24 months, identify the quantity/extent of the commodity that you obtained from the Affiliate(s) identified in (ii) above.

Stand - All LDC's 1-5:

With regard to your relationship with an unregulated Marketing Affiliate, if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Marketing Affiliate. .
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify the total revenues generated by your Marketing Affiliate under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-6:

With regard to your relationship with an "Asset Manager", if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Asset Manager.
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify both the total revenues paid to your Asset Manager and the total revenues received from your Asset Manager under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-7:

Relative to your pipeline delivery requirements, please respond to the following:

- A. During the past 2 years, with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any supplier? If so, identify and fully describe any such waiver and/or alteration, and the supplier.
- B. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any consumer or customer? If so, identify and fully describe any such waiver and/or alteration, and the consumer/customer.

C. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for your Gas Marketing Affiliate, if any? If so, identify and fully describe any such waiver and/or alteration, and the Affiliate.

Stand - All LDC's 1-8

Please respond to the following:

A. Identify any item or document that you intend to or desire to use, refer to, rely on, sponsor, and/or introduce as evidence in the hearing in this matter(s).

Stand - Duke 1-9:

- A. How many public or private school systems in your Kentucky territory have contracted for gas transportation service?
- B. What percentage of your system gas supplies for Duke Kentucky are produced in Kentucky?

CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's First Set of Information Requests to Duke Energy Kentucky, Inc. were served upon the following parties of record via U.S. Mail postage prepaid on July 15, 2010.

Ms. Judy Cooper
Manager, Regulatory Services
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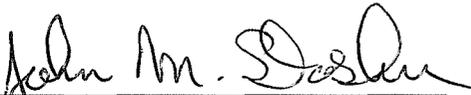
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Mike Martin
V.P. Rates & Regulatory Affairs
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, Kentucky 42303


JOHN M. DOSKER

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 15 2010

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:)
AN INVESTIGATION OF NATURAL GAS) Case No. 2010-00146
RETAIL COMPETITION PROGRAMS)

STAND ENERGY CORPORATION'S FIRST REQUESTS FOR INFORMATION
TO LOUISVILLE GAS & ELECTRIC, INC.

Intervenor, Stand Energy Corporation ("SEC"), by and through counsel, submits the following requests for information, pursuant to 807 KAR 5:001 for response from Louisville Gas & Electric, Inc. ("LG&E") in accordance with the following definitions and instructions:

DEFINITIONS

1. "Affiliate" means, in relation to any Person, any entity controlled, directly or indirectly, by such Person, any entity that controls, directly or indirectly, such Person, or any entity directly or indirectly under common control with such Person. For this purpose, "control" of any entity or Person includes, but is not limited to, ownership of a majority of the voting power of the entity or Person or by contractual means or otherwise.
2. "Any" means each, every, and all Persons, Documents, Documentation, and Correspondence, places or things to which the term refers to or concerns.

3. "Communication(s)" means, but is not limited to, all forms of interaction or communication whether written, printed, oral, pictorial, electronic or by any other medium.
4. "PSC" or "Commission" refers to the Kentucky Public Service Commission, including its Members, Directors, personnel, employees and consultants.
5. "Staff" refers to the Staff of the Kentucky Public Service Commission.
6. "Consumer(s)" means all customers, end-users, and consumers, without limit, that receive at least natural gas distribution services from Atmos.
7. "Concerning" or "concerning" is used in its broadest sense when used with reference to a stated subject; "concerning" shall mean and include both of the following: (i) containing, comprising, constituting, stating, setting forth, recording, relating to, recording, including, negating or manifesting in any way, whether in whole or in part, that subject; and (ii) alluding to, describing, discussing, reflecting, interpreting, identifying, regarding, contradicting, referring to, or in any way pertaining to, whether in whole or in part, that subject.
8. "Correspondence(s)" means, without limiting its general meaning, all letters, telegrams, faxes, emails, notices, messages, memoranda and other written or electronic Communications.
9. "Document(s)" or "Documentation(s)" when used herein, means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody, or control regardless of where located; including without limiting the generality of the following: punchcards, printout sheets, movie film, slides, phonograph records, photographs, microfilm, video media, notes, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts, purchase

orders, checks and drafts, acknowledgments, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, correspondence, telegrams, drafts, discs or tapes, and computer produced interpretations thereof, instructions, announcements, schedules, price lists, electronic copies, and mechanical or electric sound recordings and transcripts thereof. In all cases, "Document(s)" or "Documentation(s)" shall also mean all written, printed, reproduced, recorded, typed, graphic, photographic, or electronic matter in your possession, custody, or control, including without limitation books, manuals, pamphlets, periodicals, correspondence, letters, memoranda, faxes, telegrams, electronic mail ("email") messages and attachments, reports, records, studies, transcripts, work papers, working papers, notes, charts, graphs, indices, data sheets, and all drafts thereof, and every copy of a document which contains handwritten or other notations not otherwise duplicated in the original or any other copy. In all cases, where originals and/or non-identical copies are not available, "Document(s)" or "Documentation(s)" shall also mean identical copies of original documents and copies of non-identical copies.

10. "Distribution Facilities" refers to equipment owned, operated, and/or controlled by CGK that is directly or indirectly related to or associated with its provision of natural gas distribution delivery and related services to Consumer(s), from the location of the equipment controlled by the Consumer and up to and including all the facilities, plant, and equipment that serve the Consumer.
11. "Identifications" or "Identify" or "Identity" or "Identified" when used herein shall mean that you are required to provide the requested information as the context requires it, and also, when used in reference to: (a) a natural individual, require you to state his or her full name, residential and business address, business title(s), and the entity(s) that the Person works for and/or worked

for at the time of the transaction or activity inquired into and at the time of the inquiry; (b) a corporation, require you to state its full corporate name and any names under which it does business, its state of incorporation, the address of its principal place of business, and the addresses of all of its offices; (c) a business, require you to state the full name or style under which the business is conducted, its business address or addresses, the type of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, and control the business; (d) a Document or Documentation, require you to state the number of pages and the nature of the document (for example and without limitation, letter or memorandum, its title, its date, the name or names of its authors and recipients, and its present location and custodian, and whether or not it is claimed that such document is privileged and, if so, the type of privilege claimed and a statement of all the circumstances which will be relied on to support such claim of privilege; (e) Correspondence(s), to identify the Document(s) and/or Documentation(s) which refer to or evidence the Correspondence; (f) Communication, if written, to identify the Document(s) or Documentation(s) which refer to or evidence the Communication, and to the extent engaged in orally or otherwise, to provide the date, manner, place, and substance of the Communication.

12. "Load" means the consumption of Consumers that received and/or are currently receiving local distribution service (whether standard-offer or otherwise) from the local distribution company.
13. "Person(s)" includes any natural person, corporate entity, firm, partnership, association, joint venture, cooperative, municipality, city, county, irrigation district, drainage district or other special district or political subdivision, or federal, state or local governmental body,

department, or agency, entity or group of persons, unless the context clearly indicates that only an individual person is referred to.

14. "Pool" means a group of Consumers that take or receive service from a single provider that have been joined together, for Any particular purpose, with other Consumers taking or receiving from that same provider.
15. "Studies" means without limitation reports, analyses, studies, investigations, reviews, summaries, audits, forecasts, opinions, opinion Documents, justification Documents, and all drafts and prior versions of such Documents.
16. "Supplier" means without limitation, a marketer, supplier, alternate commodity supplier, capacity, supply, and/or commodity management provider, Pool operator, aggregator, or governmental aggregator but does not include system supply unless specifically requested.
17. "You" or "Your" or "Yourself" refers to the party to which or whom these discovery requests are directed, including all Affiliates, joint partnerships, corporate parents, subsidiaries, departments, divisions, officers, agents, consultants, employees, contractors, predecessors, successors and assigns, whether present or former.

INSTRUCTIONS FOR ANSWERING

1. Each response, document or objection should be immediately preceded by the corresponding request or sub-request to which it responds.
2. Each response must be supplemented by timely amendments if subsequent information renders any response incorrect in any material respect.
3. For each response, please identify the individual who prepared the response or the person(s) under whose supervision the response was prepared.

4. For these responses, please provide an oath or certification that the responses are true and accurate to the best of the preparer's knowledge, information and belief after reasonable inquiry.
5. Each request shall be deemed continuing in nature and must be updated immediately upon receipt of any new, further or different information that is responsive to the request.
6. With respect to any request consisting of separate parts or subparts, a complete response to each subpart is required as if the subpart were set forth as a separate request.
7. If any request cannot be answered in full after reasonable inquiry, please provide the response to the extent available, state why the request cannot be answered in full, and provide any information within your knowledge concerning the description, existence, availability, and custody of any unanswered portions.
8. In responding to these requests, please provide information from all files in the possession of, owned by, controlled by, or accessible to you, as well as all files maintained or controlled by officers, employees, agents or consultants or other representatives of your organization.
9. If no information or document is responsive to any request, please so state in the response.
10. If any document requested is not in your possession but you know or believe it to exist, please so state and identify to the best of your ability the last known location of the document and its custodian.
11. If any document requested or related to any request has been destroyed or discarded, please state the date the document was destroyed, the person or entity responsible for its destruction, the reason for its destruction, and provide a description of the contents of the document.
12. If any information or Documentation is not available in the exact form requested, please provide any available information or documents that best respond to the request.

13. For any information or Documents maintained by computer or data storage mechanism, please state the name of the file from which the information came, how the data is stored (CD, diskette, tape, etc.), the computer or media program in which it is stored, the name of the Person who collected or entered the information, and how the Document or information can be transmitted and retrieved.
14. The singular form of a word shall be interpreted as plural, and the plural form as singular, to the extent appropriate in order to respond to the scope of these requests and to make the request inclusive rather than exclusive.
15. “And” and “or” shall be construed either disjunctively or conjunctively as appropriate to respond to the scope of these requests.
16. Any objection to a request should provide a list of all information or documents withheld, describe the character and specific subject matter of the information withheld, including a description of the number of documents withheld and a summary of the information contained in such documents, and should clearly state the specific objection asserted and the grounds on which the objection is based.

REQUESTS FOR INFORMATION

Stand - All LDC's 1-1:

With regard to your transportation tariffs. Please answer the following:

- A. Does it cost you more to deliver third party or supplier natural gas to a customer compared to the cost to deliver natural gas to a sales customer of the same size? If so, explain why in detail.
- B. Discuss whether you believe daily balancing or monthly balancing should be required of transportation customers and explain why, in detail.
- C. Excluding periods of OFO's and OMO's, please identify the financial harm to your firm sales customers that has occurred over the past 12 months because of daily imbalances of transportation customers?
- D. During the past 12 months, please identify each day when transportation customers' deliveries provided a financial credit or system benefit to firm sales customers?
- E. If you believe that larger transportation consumers should be subject to daily balancing and smaller transportation consumers subject to monthly balancing explain how you determine the amount of daily or monthly usage that requires daily or monthly balancing and explain.
- F. If there are charges for imbalances or penalties for imbalances describe and explain the reasoning for the penalties and describe the allocation of the generated imbalance penalty dollars.
- G. Identify any operational events that have occurred that caused you to determine that daily or monthly balancing is necessary. Provide sufficient event details to justify a decision based thereon.
- H. Discuss whether or not you believe that supplier "pooling" should be allowed by Kentucky natural gas utilities to allow suppliers to pool deliveries for balancing and penalty avoidance

purposes. If not, explain in detail why not.

- I. Discuss the necessity for each penalty set forth in your transportation tariffs and the reasons underlying each of the penalty amounts.
- J. Identify and briefly explain the allocation of the generated penalty dollars.

Stand - All LDC's 1-2:

With regard to your operations pursuant to currently approved PSC tariffs, please respond to the following:

- A. For the period covering the past 24 months, identify the dates and duration of all operational flow orders, operational matching orders or other flow orders imposed by you.
- B. For all flow orders identified in (A) above, list the reason the flow order was imposed.

Stand - All LDC's 1-3:

With regard to your operations pursuant to currently approved tariffs, please respond to the following:

- A. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Supplier? If so, identify any such waiver and the Supplier that received the waiver.
- B. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any Affiliate? If yes, identify any such waiver and the Affiliate that received the waiver.
- C. For the past 24 months, have you waived any requirement set forth in PSC-approved tariffs for any consumer? If so, identify any such waiver and the consumer that received the waiver.

Stand - All LDC's 1-4:

With respect to the total gas load served by you, please respond to the following:

- A. Of the total load served by you, (i) Identify the quantity/extent of this load that is served by commodity that you obtain from any affiliate, (ii) Identify each affiliate from whom you obtain the commodity identified in (i) above; and, (ii) for the period covering the past 24 months, identify the quantity/extent of the commodity that you obtained from the Affiliate(s) identified in (ii) above.

Stand - All LDC's 1-5:

With regard to your relationship with an unregulated Marketing Affiliate, if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Marketing Affiliate. .
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify the total revenues generated by your Marketing Affiliate under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-6:

With regard to your relationship with an "Asset Manager", if any, respond to the following if they are applicable:

- A. Identify each agreement and contract document between you and your Asset Manager.
- B. Identify any written agreements and contracts that superseded or were successors to the agreement(s) Identified in (A) above.
- C. For the years 2008, and 2009, (i) Identify both the total revenues paid to your Asset Manager and the total revenues received from your Asset Manager under the agreement Identified in (A) above, (ii) Identify how the revenues Identified in (i) are allocated among the recipient(s) of that revenue, (iii) for the revenues Identified in (i), categorize and Identify the nature of the transaction that generated the revenues, such as, for example, revenues from utilized pipeline capacity transactions, revenues from commodity transactions, revenues from hedges and options, etc.

Stand - All LDC's 1-7:

Relative to your pipeline delivery requirements, please respond to the following:

- A. During the past 2 years, with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any supplier? If so, identify and fully describe any such waiver and/or alteration, and the supplier.
- B. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for any consumer or customer? If so, identify and fully describe any such waiver and/or alteration, and the consumer/customer.

C. During the past 2 years, and with regard to the pipeline delivery requirements, have you waived or otherwise altered specific compliance with the requirements for your Gas Marketing Affiliate, if any? If so, identify and fully describe any such waiver and/or alteration, and the Affiliate.

Stand - All LDC's 1-8

Please respond to the following:

A. Identify any item or document that you intend to or desire to use, refer to, rely on, sponsor, and/or introduce as evidence in the hearing in this matter(s).

Stand - LG&E 1-9:

Please answer the following questions:

- A. How many public or private school systems are using gas transportation services on your system?
- B. How many government facilities (Federal, State or Municipal) are using gas transportation services on your system?
- C. Your Firm Transportation Service (FT) rate schedule requires a customer to use at least 50 Mcf each day to qualify even though they may use as much as 49,000 Mcf annually. (365 days per year times 50 Mcf = 18,250 Mcf per year). What is the reason for the 50 Mcf minimum daily usage requirement?

CERTIFICATE OF SERVICE

I hereby certify that a copy of Stand Energy Corporation's First Set of Information Requests to Louisville Gas & Electric Company, Inc. were served upon the following parties of record via U.S. Mail postage prepaid on July 15, 2010.

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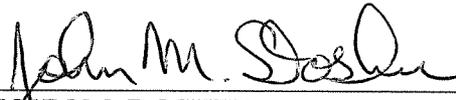
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