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COMMONWEALTH OF KENTUCKY

AUG 20 2010

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION OF NATURAL GAS)
RETAIL COMPETITION PROGRAMS)

CASE NO.2010-00146

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

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, and hereby propound the following second requests for information upon Duke Energy Kentucky ("Duke Energy") to be answered by those officers, employees or agents of Duke Energy as may be cognizant of the requested information and who are authorized to answer on behalf of Duke Energy. These requests are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete.

Additional Instructions

A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.

B. Restate the information inquiry immediately preceding each response.

C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit us to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

I. Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means Duke Energy or the witness, as the context requires.

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which Duke Energy or its officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.

3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or

(b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every."

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

Respectfully submitted,

HURT, CROSBIE & MAY PLLC



William H. May, III
Matthew R. Malone
The Equus Building
127 West Main Street
Lexington, Kentucky 40507
(859) 254-0000 (office)
(859) 254-4763 (facsimile)

Counsel for,
INTERSTATE GAS SUPPLY, INC.
SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

CERTIFICATE OF SERVICE AND FILING

Comes Interstate Gas Supply, Inc. (“IGS”), SouthStar Energy Services, LLC (“SouthStar”) and Vectren Retail, LLC d/b/a Vectren Source (“Vectren”), individually, and hereinafter, collectively, by counsel, and hereby certifies that an original and twelve (12) copies of the second data requests to Duke Energy were served via hand-delivery upon Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail, postage prepaid, on the following, on this 20th day of August, 2010.

Lonnie E Bellar
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

John B Brown
Delta Natural Gas Company, Inc.
36 17 Lexington Road
Winchester, KY 40391

Judy Cooper
Columbia Gas of Kentucky, Inc.
2001 Mercer Road
P. O. Box 14241
Lexington, KY 40512-4241

Rocco D'Ascenzo, Esq.
Duke Energy Kentucky, Inc.
139 East 4th Street, R.25 At II
P. O. Box 960
Cincinnati, OH 45201

John M Dosker, Esq.
Stand Energy Corporation
1077 Celestial Street
Building 3, Suite 110
Cincinnati, OH 45202-1629

Trevor L. Earl, Esq.
Reed Weitkamp Schell & Vice, PLLC
500 W. Jefferson Street
Suite 2400
Louisville, KY 40202-2812

Thomas J. FitzGerald, Esq.
Counsel & Director
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, KY 40602

Lisa Kilkelly, Esq.
Legal Aid Society
416 W. Muhammad Ali Blvd.
Suite 300
Louisville, Kentucky 40202

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

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

Mark Martin
Atmos Energy Corporation
3275 Highland Pointe Drive
Owensboro, KY 42303

Iris G Skidmore, Esq.
4 15 W. Main Street, Suite 2
Frankfort, Kentucky 4060 1



William H. May, III
Matthew R. Malone
The Equus Building
127 West Main Street
Lexington, Kentucky 40507
(859) 254-0000 (office)
(859) 254-4763 (facsimile)

Counsel for,
INTERSTATE GAS SUPPLY, INC.
SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

**IGS, SouthStar and Vectren Source's Second Data Requests to
Duke Energy Kentucky
Case No. 2010-00146**

GENERAL REQUESTS TO WITNESS B. MITCHELL MARTIN

1. Refer to page 6 of your testimony (lines 1-3) wherein you indicated that, "...if Duke Energy Kentucky were someday to implement a retail program, the Company would desire that it closely match the program in Ohio...". Does Duke Energy consider the Ohio Choice program a successful program, please explain in detail?
 - a. Other than the current lack of a Choice program and numerical differences in customers within territories in the Duke Energy Kentucky territory compared to Duke Energy Ohio please explain what differences exist between the two utility territories that support Duke Energy Kentucky's position that a Choice program should not be implemented in Kentucky?
 - b. Given the recent application for certification as a Competitive Retail Natural Gas Supplier to the Public Utilities Commission of Ohio of Duke Energy's natural gas retail supplier affiliate, does Duke Energy agree that natural gas marketers can provide benefits to customers?
 - i. If no, why does Duke Energy have a natural gas retail supplier affiliate?
 - ii. Are you aware that Duke Energy Retail Sales, LLC's application for certification included a notification that Duke Energy Retail Sales, LLC intends to serve "Residential" and "Small Commercial" customers in the territories of Columbia Gas of Ohio, Dominion East Ohio, Duke Energy Ohio and Vectren Energy Delivery of Ohio?