

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

In The Matter of:

THE APPLICATION OF LOUISVILLE GAS AND	)	
ELECTRIC COMPANY FOR AN ADJUSTMENT	)	
OF ITS ELECTRIC AND GAS RATES; A	)	
CERTIFICATE OF PUBLIC CONVEIENCE AND	)	CASE NO. 2012-00222
NECESSITY; APPROVAL OF OWNERSHIP OF	)	
GAS SERVICE LINES AND RISERS;	)	
AND A GAS LINE SURCHARGE.	)	

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**STAND ENERGY CORPORATION'S RESPONSES TO REQUESTS FOR**  
**INFORMATION FROM THE PSC STAFF**

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Intervenor, Stand Energy Corporation ("SEC"), by and through counsel, and pursuant to the revised procedural schedule issued herein, submits the following responses to requests for information from the Kentucky PSC Staff served on October 15, 2012:

1. Refer to pages 5 and 6 of the Direct Testimony of Mark Ward ("Ward Testimony"). Confirm that the excerpt from the Staff Report in Administrative Case No. 367 was under the heading "Independent Marketers," that it followed a statement on page five (5) of the Staff Report, "This is meant to represent only a factual summation of the comments made during the discussion which took place," and that this was not a conclusion drawn by Commission Staff.

**Response: Responder: Mark Ward.** Stand Energy Corporation confirms that the excerpt from the Staff Report in Administrative Case No. 367 was under the heading

“Independent Marketers,” and that it did follow a statement on page five (5) of the Staff Report, stating “This is meant to represent only a factual summation of the comments made during the discussions which took place.” It should also be noted that in the Commission’s **Order** in Administration Case No. 367, at page 2, the following conclusions were stated:

“ While the extent of customer benefit is not yet clear, the Commission supports the concept of customer choice programs targeted at residential and small commercial customers . . . The Commission believes that it can continue to ensure the integrity of the merchant function as well as the distribution function through the parameters of a customer choice program and existing tariffs, regulations, and statutes. . . . Customers may fare better with the addition of alternative suppliers of the commodity, and will have the added benefit of the innovation in products and services that competition inevitably brings.” **Id. page 2.**

2. Refer to Page Ten (10) of the Ward Testimony. Provide the following information for each of the 13 states referenced (other than Kentucky) and for the District of Columbia:
  - a. The utility or utilities providing transportation service to Stand customers; and
  - b. The transportation threshold for each transportation service tariff offered by each utility, along with the associated rate(s) for each service.

**Response: Responder: Mark Ward.**

The attached spreadsheet (Stand Energy Exhibit 1 incorporated herein as if fully set forth) provides detail of the utilities in twelve (12) states (other than Kentucky) and the District of Columbia that currently provide transportation service to Stand’s customers. In researching the multiple utility tariffs necessary to respond to this interrogatory we determined that Stand Energy Corporation currently has customers in thirty-six (36) utilities (outside of Kentucky). The thirty-one (31) utilities cited in my testimony was an inadvertent mistake as it was taken from testimony in a prior regulatory filing.

It should be noted that a majority of the thirty-six (36) utilities offering transportation to their customers do not have financial or volume threshold barriers for customers to overcome who wish to switch from utility sales service to third party suppliers. Twenty three (23) of the thirty-six (36) utilities (64%) offer transportation to all classes of customers; therefore, there is no threshold for these utilities.

Over one-half (1/2) of these utilities do not have incremental or additional charges when switching from sales service to transportation service. In many utilities the very large customers may already have telemeter equipment existing as a sales customer, but if not, customers may bear the actual equipment and labor costs for the installation.

**VERIFICATION**

The undersigned, Mark Ward, being first duly sworn, deposes and states his is Vice-President of Regulatory Affairs for Stand Energy Corporation, that he has personal knowledge of the matters set forth in the responses and the responses contained therein are true and correct to the best of his knowledge, information and belief.



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MARD WARD

**STATE OF OHIO  
COUNTY OF HAMILTON**

Signed and sworn to before me, a Notary Public for the State of Ohio by Mark Ward, personally known to me, who stated that these responses were prepared by him on behalf of Stand Energy Corporation and that the responses are true and accurate to the best of his knowledge, information and belief formed after a reasonable inquiry. My commission expires: 3/25/2017.

JOHN M. DOSKER  
Notary Public, State of Ohio  
My Commission Expires 03-25-2017

  
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NOTARY PUBLIC STATE-AT-LARGE.