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June 30, 2009

HAND DELIVERED

Hon. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40601

RECEIVED
JUN 30 2009
PUBLIC SERVICE
COMMISSION

Re: Columbia Gas of Kentucky, Inc.
Case No. 2009-00141

Dear Mr. Derouen:

We enclose for filing an original and ten copies of Requests for Information of Constellation NewEnergy-Gas Division, LLC to Columbia Gas Company of Kentucky, Inc. in the above-captioned case. We would appreciate your placing it in the file. Thanks in advance for your assistance.

Sincerely,

Robert M. Watt, III

rmw:

Enclosures

cc: Counsel of Record (w/encl.)
Mr. Ralph Dennis (w/encl.)
Mr. Christopher D. Young (w/encl.)
Mr. Stephen Baker (w/encl.)

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JUN 30 2009
PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA)
GAS OF KENTUCKY, INC. FOR AN) **CASE NO. 2009-00141**
ADJUSTMENT IN RATES)

**REQUESTS FOR INFORMATION OF CONSTELLATION
NEWENERGY-GAS DIVISION, LLC TO
COLUMBIA GAS OF KENTUCKY, INC.**

Constellation NewEnergy-Gas Division, LLC (“CNEG”) respectfully submits the following requests for information to Columbia Gas of Kentucky, Inc. (“CKY”) herein to be answered by the date specified in the Commission’s procedural schedule herein if CNEG’s Motion for Full Intervention is granted.

INSTRUCTIONS

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to CKY, its witnesses or its counsel.
2. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.
3. These requests shall be deemed continuing so as to require further and supplemental responses if CKY receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

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

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

6. If CKY has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for CNEG as soon as possible.

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

8. In the event any document requested has been destroyed or transferred beyond the control of CKY, or any of its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer CNEG to the record where the document is located.

REQUESTS FOR INFORMATION

1. Please identify the persons, by position, employer and workplace location, who will be responsible for administering CKY's proposed Price Protection Service ("PPS") program.

2. Please identify the persons, by position, employer and workplace location, who will be responsible for administering CKY's proposed Negotiated Sales Service ("NSS") program.

3. Please provide an estimate of the annual cost to administer the PPS program, with such estimate being broken down by components, such as labor, advertising, professional services and the like.

4. Please provide copies of all models, studies or other analyses, including work papers, of the annual revenues and expenses expected to be associated with the PPS program.

5. Please provide an estimate of the annual cost to administer the NSS program, with such estimate being broken down by components, such as labor, advertising, professional services and the like.

6. Please provide copies of all models, studies or other analyses, including work papers, of the annual revenues and expenses expected to be associated with the NSS program.

7. Please identify the persons, by position, employer and workplace location, that will perform customer service responsibilities for PPS customers.

8. Please identify the persons, by position, employer and workplace location, that will perform customer service responsibilities for NSS customers.

9. Please describe in detail how CKY expects to advertise or promote its PPS and/or NSS programs, separately describing any plans to utilize its call center personnel, newspapers, television and/or radio commercials or the Internet.

10. Please state in detail the estimated cost of all advertising and/or promotion described in response to Request No. 9 on an annual basis and whether CKY intends to seek recovery of such costs from its customers other than, or in addition to, PPS and NSS customers. This response should include a statement of the amount or percentage of such costs CKY expects to recover from PPS and NSS customers and the amount or percentage of such costs CKY expects to recover from its other customers.

11. Please state whether CKY intends to advertise its PPS and/or NSS programs through the use of bill inserts in CKY's bills to customers other than PPS or NSS customers.

12. If the answer to Request No. 9 is yes, please state the estimated cost of such advertising on an annual basis and whether CKY intends to seek recovery of such costs from its customers other than, or in addition to, PPS and NSS customers. This response should include a statement of the amount or percentage of such costs CKY expects to recover from PPS and NSS customers and the amount or percentage of such costs CKY expects to recover from its other customers.

13. Please provide copies of all models, studies or other analyses of the allocation of the costs expected to be associated with the PPS program.

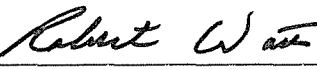
14. Please provide copies of all models, studies or other analyses of the allocation of the costs expected to be associated with the NSS program.

15. Please provide copies of all models, studies or other analyses of the customers expected to utilize the PPS service.

16. Please provide copies of all models, studies or other analyses of the customers expected to utilize the NSS service.

Respectfully submitted,

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By 
Counsel for Constellation
NewEnergy-Gas Division. LLC

CERTIFICATE OF SERVICE

This is to certify that the foregoing pleading has been served by mailing a copy of same, postage prepaid, to the following persons on this 30th day of June 2009:

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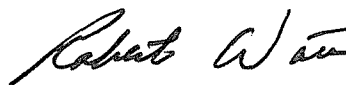
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