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July 14, 2010

Docket Clerk  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

RECEIVED

JUL 15 2010

PUBLIC SERVICE  
COMMISSION

In the Matter of: AN INVESTIGATION OF NATURAL GAS RETAIL  
COMPETITION PROGRAMS, Case No. 2010-0146

Dear Docket Clerk:

Enclosed please find for filing the original and ten (10) copies of AARP's First  
Set of Requests For Information addressed to:

Mxenergy, Inc., ProLiance Energy LLC and Stand Energy Corporation;  
Retail Energy Supply Association;  
Columbia Gas of Kentucky, Inc., and  
Atmos Energy Corporation.

All parties of record have been served.

Thanks in advance for your assistance in filing these!

Cordially,

Tom Fitzgerald  
Director  
Counsel for AARP

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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JUL 15 2010

PUBLIC SERVICE  
COMMISSION

In the Matter of:

AN INVESTIGATION OF NATURAL GAS  
RETAIL COMPETITION PROGRAMS

)  
)  
) CASE NO. 2010-00146  
)

**AARP'S FIRST SET OF REQUESTS TO INTERSTATE GAS SUPPLY, INC.,  
SOUTHSTAR ENERGY SERVICES, LLC AND VECTREN SOURCE, FOR  
INFORMATION**

Pursuant to the scheduling order adopted by the Commission in this case, AARP requests that Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source file with the Commission the following information, with a copy to all parties of record, within the time specified in the Commission's Order. For each response to request for information,

(1) Please identify the individual responsible for answering each request;

(2) These requests shall be deemed continuing so as to require further and supplemental responses if Interstate Gas Supply, Inc., Southstar Energy Services, LLC, and Vectren Source receive or generate additional information within the scope of these requests between the time of the response and the time of the hearing;

(3) A request to identify a document means to state the date or dates, author or originator, the subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian;

(4) To the extent that the specific document, study or information requested does not exist, but a similar document, study or information does exist, please provide the similar document, study or information;

(5) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout;

(6) If there are objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify AARP's Attorney of Record as soon as possible;

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

(8) In the event any document called for has been destroyed or transferred beyond the control of the company, please state the identity of the person by whom it was destroyed or transferred; 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 disposed of by operation of a retention policy, state the retention policy; and

(9) Where the information requested is the same as has been provided to another party in response to a request for information, it is sufficient to identify that response rather than duplicating the information requested.

**Request For Information 1**

For Mr. Collins, with respect to your testimony at p. 2, is it your testimony that only through retail competition is it possible to offer gas consumers in Kentucky price transparency, timely price signals, and information on which they can make consumption decisions? If so, why?

**Request for Information 2**

For Mr. Collins, with respect to your testimony at p. 2, how many retail gas customers (whether from competitive suppliers or from monopoly utilities) were there in the United States at the time that 5,100,000 such customers had access to competitive suppliers?

**Request for Information 3**

For Mr. Collins, with respect to your testimony at pp. 2-3, is it your testimony that there are no normative standards for success of choice of retail gas suppliers beyond perceptions of customer satisfaction? For example, if customers are satisfied but the underlying industry structure contains weaknesses that could ultimately lead to higher prices or less reliable supply, is it good public policy to require an industry structure that has this result?

**Request for Information 4**

For Mr. Collins, with respect to your testimony at p. 3, please provide any analyses or other evidence to support your testimony that the benefits of competition are maximized when the market is most dynamic, and that market dynamism is manifested by criteria including the number of competitive suppliers in the market, the number of product options available in the market, the number of customers who migrate from utility sales

service to competitive supply service, and the minimization of barriers to supplier market entry.

**Request for Information 5**

For Mr. Collins, with respect to your testimony at p. 6, is it your testimony that there are no incremental costs for a utility to bill and collect for itself and multiple competitive suppliers over the costs of the utility billing and collecting for itself alone?

**Request for Information 6**

For Mr. Collins, please define the term "human needs customer" as you use it in your testimony, for example at p. 7.

**Request for Information 7**

For Mr. Collins, with respect to your testimony at pp. 6-7, is it your testimony that the 85% of customers who have access to gas supplier choice but have not chosen competitive gas supply are human needs customers? Is it your testimony that none or only a small portion of the 15% of customers with supply choice who have used a competitive supplier are human needs customers? If not, please clarify your statement at p. 7, lines 2 to 3, with the portion of shoppers and non-shoppers that are human needs customers.

**Request for Information 8**

For Mr. Collins, with respect to your testimony at p. 10, starting at line 11, please identify each utility with a choice program in which the utility renders a consolidated bill for both utility distribution service and the supplier's commodity charges, state whether

the utility purchases the suppliers' receivables, and state the terms and conditions of recourse by the utility to the supplier for shortfalls in recovery of such receivables.

**Request for Information 9**

For Mr. Collins, with respect to your testimony at p. 11, please provide the costs or the range of costs (stated in nominal terms and by per-therm or per-customer cost) for suppliers to build and operate a duplicate receivables management capability. If a range is provided, please explain the factors that determine where on the range a given supplier will fall.

**Request for Information 10**

For Mr. Collins, with respect to your testimony at p. 12, please explain how regulatory risk associated with utility cost recovery can be minimized or eliminated to varying degrees depending on customer choice participation levels.

**Request for Information 11**

For Mr. Collins, with respect to your testimony at p. 13, please identify each utility and jurisdiction that has in place reasonable standards with respect to customer interaction, enrollment and contracting, and identify the standards in place for each such utility or jurisdiction.

**Request for Information 12**

To the extent that the testimony filed on behalf of Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source includes calculations of savings that any of your businesses have provided to customers over the costs they would otherwise

have paid under regulated utility gas service, please provide all workpapers of each such calculation or estimate, in executable spreadsheet form, with identification of all relevant source material.

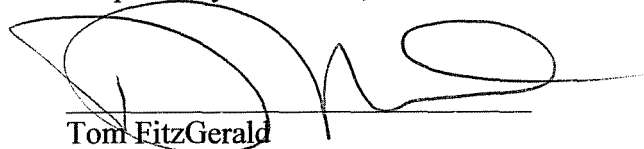
**Request for Information 13**

To the extent that the testimony filed on behalf of Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source asserts that terms and conditions for retail gas choice in Kentucky are more onerous and fees and charges are higher than in other jurisdictions, please provide any analysis or other evidence that demonstrates that the Kentucky terms, conditions, fees or charges are: (a) not cost-based; (b) unjust; or (c) unreasonable.

**Request for Information 14**

Is it the position of Interstate Gas Supply, Inc., Southstar Energy Services, LLC and/or Vectren Source that supervision by the Kentucky Public Service Commission of the competitiveness of the retail supply market in Kentucky is: (a) within the jurisdiction of the Commission, and (b) provides a state action protection against application of anti-trust laws to that market? Please provide your reasoning and relevant citations to support your position on these questions.

Respectfully submitted,



Tom FitzGerald  
Kentucky Resources Council, Inc.  
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**CERTIFICATE OF SERVICE**

I certify that an original and ten (10) copies of AARP's First Set of Requests to Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source for Information, were transmitted for filing by priority mail to the Docket Clerk, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 and that a true and accurate copy of the foregoing was mailed via first class U.S. Mail, postage prepaid, this 14th day of July, 2010, to the following:

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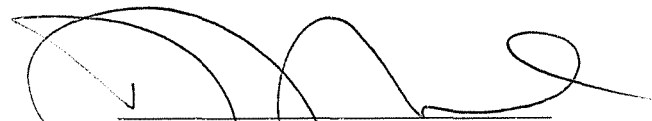
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