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* Of Counsel

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JUL 15 2010

**PUBLIC SERVICE
COMMISSION**

July 15, 2010

Via Hand-Delivery

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

RE: *Case No. 2010-00146; An Investigation of Natural Gas Retail Competition Programs*

Dear Mr. Derouen:

Please find enclosed the original and twelve (12) copies of Interstate Gas Supply Inc.'s, SouthStar Energy Services, LLC's and Vectren Source's data requests to the following:

- The Community Action Council
- The Association of Community Ministries
- Delta Gas
- Columbia Gas
- Louisville Gas and Electric
- Atmos Energy
- The AARP
- Duke Energy

Please place the document of file.

Regards,



Matthew Malone

C: File; Parties

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JUL 15 2010

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY 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 REQUESTS FOR INFORMATION TO THE CAC**

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, and hereby propound the following requests for information upon CAC to be answered by those officers, employees or agents of CAC as may be cognizant of the requested information and who are authorized to answer on behalf of CAC. 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 CAC 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 CAC 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



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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 data requests to CAC 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 15th day of July, 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

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P.O. Box 1070
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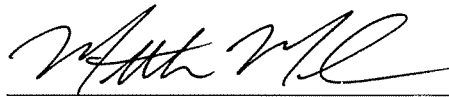
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and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

**IGS, SouthStar and Vectren Source's Data Requests to
CAC
Case No. 2010-00146**

GENERAL REQUESTS TO WITNESS JACK E. BURCH

1. In preparing your testimony, please identify with whom you discussed the issue of retail competition?
2. Please provide copies of all work papers, documents or data used to complete your testimony.
3. Please refer to p. 2 line 24 and p. 3 lines 1-2 of your testimony where you indicate that, “through conversation with Council staff members who work with customers in the Columbia Gas service area, I have learned that many customers are confused by retail gas marketing terms and conditions and often feel misled or unfairly treated by marketers.” Please provide any documents which you possess which support this allegation.
4. Please refer to p. 6 line 1 of your testimony where you discuss, the CAC’s experience in the field of natural gas marketing. Please provide any and all documents, contracts, complaints, solicitations and offers in your possession associated with the CAC or Community Action Council Buyer’s Club, Inc.
5. Please refer to p. 6 line 1 of your testimony where you discuss, the CAC’s experience in the field of natural gas marketing. Please list the names and contact information of any key employees involved in the Community Action Council Buyer’s Club, Inc.
6. Please refer to p. 6 line 1 of your testimony where you discuss, the CAC’s experience in the field of natural gas marketing. Please list the source of funding for the Community Action Council Buyer’s Club, Inc. for the previous purchase of natural gas on behalf of users of the organization.
 - a. Additionally please provide information and documentation regarding the typical purchases of natural gas supply used to support the Community Action Council Buyer’s Club, Inc.
7. Please refer to page 8, line 10 of your testimony where you indicate, “[m]arketers should be prohibited from signing customers up by telephone unless there is a requirement that, subsequent to any telephone solicitation and customers verbal consent, the marketer must mail written confirmation to the customs with a provision for the customer to confirm his/her consent in writing by return mail.” Are you are aware of the current recorded telephone verification procedures for migrating customers in the Columbia CHOICE program? If so, please describe the telephone verification process.
 - a. Likewise, are you aware that the telephone verification process is recorded and maintained and after a customer migrates by telephone a

written copy of the terms and conditions and a welcome letter are forwarded to the customer?

- b. Please identify with specificity what you find objectionable to the recorded telephone verification process for migrating customers.
8. Please refer to page 8, line 14, where you indicate, “[c]ustomers must give consent in writing to the utility before it may release customer’s name, account information, and contact information to the marketer.” Please identify what is sensitive or confidential with respect to existing customer lists of utilities?
 - a. Likewise, do you agree that if marketers were able to decrease their marketing expenses by forwarding offers to potential existing utility customers (rather than persons that may not need natural gas) thus resulting in lower operating expenses by avoiding needless advertising that existing customers would likely benefit by potentially receiving lower offers from marketers?
9. As a general matter, do you believe it is appropriate for any group of natural gas customers to subsidize another group of natural gas customers? If so, please explain and provide examples.
10. As a general matter, do you believe that it is appropriate for natural gas customers that migrate to a competitive retail supplier to continue to pay for capacity/storage if they are not provided with access to the capacity/storage?
 - a. Likewise, do you believe that it is appropriate for customers of competitive retail suppliers to pay for other costs if they do not assist in creating those costs (e.g. working capital for gas in storage or bad debt related to the commodity if there is no POR program)? With respect to both questions please explain in detail.

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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY 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 REQUESTS FOR INFORMATION TO THE ASSOCIATION OF
COMMUNITY MINISTRIES**

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, and hereby propound the following requests for information upon Association of Community Ministries ("ACM") to be answered by those officers, employees or agents of ACM as may be cognizant of the requested information and who are authorized to answer on behalf of ACM. 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 Association of Community Ministries 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 Association of Community Ministries 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.

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

Respectfully submitted,

HURT, CROSBIE & MAY PLLC



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(859) 254-0000 (office)
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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 data requests to ACM 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 15th day of July, 2010.

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Columbia Gas of Kentucky, Inc.
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Counsel for,
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SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

**IGS, SouthStar and Vectren Source's Data Requests to
Association of Community Ministries
Case No. 2010-00146**

GENERAL REQUESTS TO WITNESS MARLON CUMMINGS

1. In preparing your testimony, please identify with whom you discussed the issue of retail competition?
2. Please provide copies of all work papers, documents or data used to complete your testimony.
3. Please refer to p. 3 lines 10-13 in your testimony where you refer to having reviewed information from, “the LIHEAP Clearinghouse, newspaper coverage, and other sources available to the general public..” please provide copies of the data you reviewed in compiling your testimony and all work papers or data used to complete your testimony.
4. Please refer to p. 4 lines 2-5 in your testimony, where you refer to relying upon “media reports” please provide any documentation you relied upon in creating your testimony beyond what has been provided in Exhibit “A”.
5. Please refer to p. 4 lines 15 in your testimony where you indicate, “...it appears that states restructuring or deregulating natural gas service to residential customers have also, through legislation and/or regulation, put into place mandatory low income energy assistance programs to ameliorate the potential harsh impact on low-income customers”. Please advise what evidence or documentation you possess to support this statement beyond your Exhibit “B”.
 - a. Additionally, please confirm whether prior to deregulation in Georgia and Ohio whether some low income customers were already receiving benefits from low income energy assistance programs and whether low income energy assistance programs were in place?

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COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY 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 REQUESTS FOR INFORMATION TO DELTA NATURAL GAS
COMPANY, INC.**

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, and hereby propound the following requests for information upon Delta Natural Gas Company, Inc. ("Delta") to be answered by those officers, employees or agents of Delta as may be cognizant of the requested information and who are authorized to answer on behalf of Delta. 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.

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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:

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Rocco D'Ascenzo, Esq.
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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 Data Requests to
Delta Natural Gas Company
Case No. 2010-00146**

GENERAL REQUESTS TO WITNESS GLENN JENNINGS

1. In preparing your testimony, please identify with whom you discussed the issue of retail competition?
2. Did Delta have a meeting of the board of directors at which Delta adopted its position that retail choice should not be mandated for LDC's? If so, please produce any board meeting notes or any other documents in Delta's possession in regards to its position?
3. What studies, evidence or documents did Delta rely upon in determining its position? Please produce copies of these documents, if any.
4. Please provide copies of all work papers or data used to complete your testimony.

RECEIVED
JUL 15 2010
PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY 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 REQUESTS FOR INFORMATION TO COLUMBIA GAS OF
KENTUCKY, INC.**

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, and hereby propound the following requests for information upon Columbia Gas of Kentucky, Inc. ("Columbia") to be answered by those officers, employees or agents of Columbia as may be cognizant of the requested information and who are authorized to answer on behalf of Columbia. 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 Columbia Gas of Kentucky, Inc. 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 Columbia Gas of Kentucky, Inc. 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



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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 data requests to Columbia 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 15th day of July, 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

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VECTREN SOURCE

**IGS, SouthStar and Vectren Source's Data Requests to
Columbia Gas of Kentucky
Case No. 2010-00146**

GENERAL REQUESTS TO WITNESS JUDY COOPER

1. In preparing your testimony, with whom did you discuss the issue of retail competition?
2. Please provide copies of all work papers or data used to complete your testimony.
3. Please refer to p. 7 lines 19-23 of your testimony where you indicate, "...Columbia...is the supplier of last resort. As a result, no customer has ever failed to receive the quantity or quality of natural gas desired for consumption due to the failure of a marketer to deliver gas on behalf of that customer to Columbia." Other parties to this proceeding have contemplated that expanded retail competition will impact the reliability of service and result in a loss of the "obligation to serve" for participating LDCs (e.g. p. 3 of Witness Nancy Brockway of the AARP lines 25-26). Given Columbia's experience with its CHOICE program, have Columbia shopping customers versus non-shopping customers experienced any difference in reliability of service during the pilot program?
 - a. Likewise, has the Columbia CHOICE program in anyway resulted in any loss of the "obligation to serve" by Columbia?
 - b. Lastly, do you believe that a properly structured retail competition programs should result in reliable service?
4. Please refer to p. 11 line 10 of your testimony where you indicate that the Columbia CHOICE program currently consists of 32,047 customers. Other parties to this proceeding have contemplated that retail competition could impact customer service and consumer protections (e.g. p.3 of Witness Nancy Brockway of the AARP lines 24-25). Given Columbia's experience with its CHOICE program, do you believe that proper vetting of prospective retail marketers and appropriate codes of conduct will allow for appropriate protections of customers if retail competition were expanded?

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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY 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 REQUESTS FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC**

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, and hereby propound the following requests for information upon Louisville Gas and Electric ("LG&E") to be answered by those officers, employees or agents of LG&E as may be cognizant of the requested information and who are authorized to answer on behalf of LG&E. 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.

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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.

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Definitions

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2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which LG&E 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.

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

Respectfully submitted,

HURT, CROSBIE & MAY PLLC



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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 data requests to LG&E 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 15th day of July, 2010.

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Counsel for,
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SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

**IGS, SouthStar and Vectren Source's Data Requests
to LG&E
Case No. 2010-00146**

GENERAL REQUESTS TO LG&E

1. In preparing your testimony, please identify with whom you discussed the issue of retail competition?
2. Did LG&E have a meeting of the board of directors at which LG&E adopted its position that retail choice should not be mandated for LDC's?
 - a. If so, please produce any board meeting notes or any other documents in LG&E's possession in regards to its position?
3. Did you personally attend meetings at which LG&E adopted its position that LDC's should not be mandated to allow retail choice?
 - a. Additionally, please identify at what level of the LG&E corporation the decision was made, what individuals rendered the decision and what facts they relied on rendering the decision?
4. Please provide copies of all work papers or data used to complete your testimony.
5. What studies, evidence or documents did LG&E rely upon in determining its position? Please produce copies of these documents, if any.
6. Is LG&E aware of PPL Corporation's position on expanded retail choice in Kentucky, if so, please explain.
 - a. If PPL believes that mandating a retail choice program is not in the best interest of Kentucky, please explain and reconcile PPL's position in this proceeding with the fact that a PPL affiliate company engages in retail gas marketing in other utility markets.
7. Please refer to p. 28, lines 1-4 where you recommend that the Commission, "consider marketer reciprocity rules which could require that a marketer affiliated with an LDC should not be able to participate in expanded unbundling programs in Kentucky unless its affiliated LDC is also unbundled to the same degree as that of the Kentucky LDC whose customers it wishes to serve." Please provide any documents, evidence or studies which support this suggestion.
8. Please refer to p. 37, line 20 where you indicate that expanded retail marketing may negatively impact school tax revenue. Please identify and produce evidence, documents, statutes, regulations or studies support this allegation, if any.
9. Please explain the details, including any sharing ratios, of any current performance based regulation (PBR) of which LG&E is subject in Kentucky, if any?

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**PUBLIC SERVICE
COMMISSION**

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY 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 REQUESTS FOR INFORMATION TO ATMOS ENERGY
CORPORATION**

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, and hereby propound the following requests for information upon Atmos Energy Corporation ("Atmos") to be answered by those officers, employees or agents of Atmos as may be cognizant of the requested information and who are authorized to answer on behalf of Atmos. 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.

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Definitions

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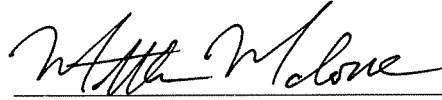
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Counsel for,
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Counsel for,
INTERSTATE GAS SUPPLY, INC.
SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

**IGS, SouthStar and Vectren Source's Data Requests to
Atmos Energy Corporation
Case No. 2010-00146**

GENERAL REQUESTS TO WITNESS MARK A. MARTIN

1. In preparing your testimony, please identify with whom you discussed the issue of retail competition?
2. Did Atmos have a meeting of the board of directors at which Atmos adopted its position that retail choice should not be mandated for LDC's?
 - a. If so, please produce any board meeting notes or any other documents in Atmos's possession in regards to its position?
3. Did you personally attend meetings at which Atmos adopted its position that LDC's should not be mandated to allow retail choice?
 - a. Additionally, please identify at what level of Atmos corporation the decision was made, what individuals rendered the decision and what facts they relied on rendering the decision?
4. Please provide copies of all work papers or data used to complete your testimony.
5. What studies, evidence or documents did Atmos rely upon in determining its position? Please produce copies of these documents, if any.
6. Please provide copies of all work papers or data used to complete your testimony.
7. Please refer to p. 11 line 28, where you indicate that, "[s]chool tax revenues may also be negatively impacted by retail choice programs." Please provide what statute, regulation, document or evidence supports this allegation.
8. Please explain and reconcile Atmos' position in this proceeding with the fact that an Atmos' affiliate company engages in retail gas marketing in other utility markets.
9. Please refer to 14, line 24 of your testimony where you discuss the Catalyst bankruptcy in Georgia. Please submit and explain whether you are aware of any service disruptions to Catalyst customers as a result of the bankruptcy of Catalyst to its customers.
 - a. Are you aware of steps that the Georgia Commission has taken in the event of any future bankruptcies of marketers (e.g. adopting a new methodology for the marketer true-up process to address the mismatch between allocated and actual gas use)? If so, please explain.

10. Please explain the details, including any sharing ratios, of any current performance based regulation (PBR) of which Atmos is subject in Kentucky, if any?

RECEIVED

COMMONWEALTH OF KENTUCKY

JUL 15 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 REQUESTS FOR INFORMATION TO THE AARP**

Comes now Interstate Gas Supply, Inc., Southstar Energy Services, LLC and Vectren Source, and hereby propound the following requests for information upon AARP to be answered by those officers, employees or agents of AARP as may be cognizant of the requested information and who are authorized to answer on behalf of AARP. 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 AARP 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 AARP 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.

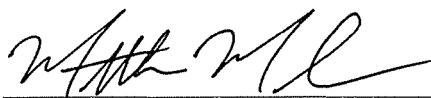
6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every."

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



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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 data requests to AARP 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 15th day of July, 2010.

Lonnie E Bellar
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Louisville, KY 40202

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36 17 Lexington Road
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Judy Cooper
Columbia Gas of Kentucky, Inc.
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SOUTHSTAR ENERGY SERVICES, LLC
and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

**IGS, SouthStar and Vectren Source's Data Requests to
AARP
Case No. 2010-00146**

GENERAL REQUESTS TO WITNESS NANCY BROCKWAY

1. In preparing your testimony, with whom did you discuss the issue of retail competition?
2. Please provide copies of all work papers, documents or data used to complete your testimony.
3. Please refer to p. 9 line 5 in your testimony where you are questioned, “[i]s there reason to believe that all deregulated suppliers will respect consumers and deal fairly with them?” and your answer was, “[n]o...based on experience with electricity and gas deregulation in other states...” Please provide what evidence and documents you have to support this statement?
4. Please refer to p. 4 line 21 of your testimony, where you mention volumetric costs. Please clarify your concerns. Are you referring to general unbundling and are you advocating that the appropriate costs are tied to the appropriate user?
 - a. Alternatively, are you suggesting that migrated customers should continue to pay the costs for assets and services that they do not receive after they migrate?
5. Please refer to your example of “unfair dealing in the deregulated natural gas supply market” beginning on p. 9 line 12 of your testimony. Other than your citation to a newspaper article please produce whatever evidence or documents you had in your possession at the time of including this matter in your testimony to support your allegation of unfair dealing in the deregulated natural gas supply market?
6. You refer to a “doctor’s” editorial blog to support your allegation of suppliers giving prospective customers inaccurate or misleading information (See pgs. 7-9 of your testimony beginning on line 20 of p. 7). Please provide what evidence, documentation or information you possessed at the time of publishing this individual’s statement to support this individual’s contentions were in fact accurate?
 - a. Likewise, please provide what information you possessed at the time that supported the authenticity of the blog’s author including his alleged credentials?
 - b. Lastly, is it true that the drafter of the blog also refers to himself as an “environmental activist”?
7. Please refer to p. 5 lines 17-23 of your testimony where you describe Marketers have followed the “well trodden path of hard-sell door to door solicitations, teaser rates for short periods, hard to read contracts, hidden

fees, lengthy required contracts, penalties for “early cancellation”...” Please provide all documents, work papers and studies in your possession in formulating these allegations.

8. Please refer to p. 13 line 4, of your testimony and also Exhibit NB-3, where you discuss the alleged complicated nature in comparing marketer offers on an “apples to apples” comparison. Please address whether the PUCO website (Ohio Comparison), which you mentioned, currently or at this time articulates some marketer offers which consist of contract terms of 12 months or less and low or no cancellation fees?
 - a. Additionally, is it true that the PUCO website (Ohio Comparison), which you mentioned, provides a weekly snapshot of the various products in the market, and provides a tool to determine the price associated with the products?
 - b. Lastly, please provide whatever data, documents or studies you possess to support your allegation that these comparison websites (e.g. Ohio or New York) are difficult to use (see p. 13 line 10)?
9. Please refer to p.15 line 16 of your testimony where you indicate, “[a]s we have seen, there is evidence that customer service suffers under gas deregulation.” Please provide all documents, work papers and studies in your possession in formulating this allegation.
 - a. Additionally, did you review any evidence from the existing Columbia of Kentucky CHOICE program in formulating this allegation, and if so, please provide copies of whatever documents you reviewed?
10. Please refer to p. 16 line 15 of your testimony, and Exhibit NB-4 where you discuss the study performed by the Illinois Citizens Utility Board (CUB). Please address whether you independently verified the data used to compile this study?
 - a. Please submit whether you are familiar with the methodology used to create the CUB study, and if so, please explain the methodology used to formulate the CUB study?
 - b. Please clarify whether you contend that 92% of the “shopping” customers in Illinois lost money based upon the CUB study (see p. 17 lines 10-11)?
11. In several instances in your testimony, you make reference to economic theory (e.g. p. 20, line 9; p. 20 lines 1-7). Please submit whether you are an economist.
 - a. Likewise, please provide copies of any peer reviewed publications you have published in the field of economics.

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JUL 15 2010

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY 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 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 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.

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Respectfully submitted,

HURT, CROSBIE & MAY PLLC



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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 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 15th day of July, 2010.

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

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and
VECTREN RETAIL, LLC D/B/A
VECTREN SOURCE

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

GENERAL REQUESTS TO WITNESS B. MITCHELL MARTIN

1. In preparing your testimony, please identify with whom you discussed the issue of retail competition?
2. Did Duke Energy have a meeting of the board of directors at which Duke Energy adopted its position that retail choice should not be mandated for LDC's?
 - a. If so, please produce any board meeting notes or any other documents in Duke Energy's possession in regards to its position?
3. Did you personally attend meetings at which Duke Energy adopted its position that LDC's should not be mandated to allow retail choice?
 - a. Additionally, please identify at what level of the Duke Energy corporation the decision was made, what individuals rendered the decision and what facts they relied on rendering the decision?
4. Please provide copies of all work papers or data used to complete your testimony.
5. What studies, evidence or documents did Duke Energy rely upon in determining its position? Please produce copies of these documents, if any.
6. Please explain and reconcile Duke Energy's position in this proceeding with the fact that a Duke Energy affiliate company engages in retail gas marketing in other utility markets.