

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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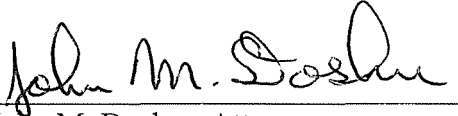
IN THE MATTER OF:)
AN INVESTIGATION OF NATURAL GAS) Case No. 2010-00146
RETAIL COMPETITION PROGRAMS)

**STAND ENERGY CORPORATION'S RESPONSES TO REQUESTS FOR
INFORMATION FROM LOUISVILLE GAS & ELECTRIC COMPANY**

Intervenor, Stand Energy Corporation (“SEC”), by and through counsel, submits the following responses to requests for information from Louisville Gas & Electric:

1. On unnumbered page 5 of 13 of Mark Ward’s testimony, he states that “Stand Energy has served the Kentucky State Reformatory in Lagrange [sic] Kentucky which is served by Louisville Gas in [sic] Electric (LG&E). In the five years we have served this account the reformatory has saved \$522,000 over what they would have paid LG&E.” For the period indicated by Stand Energy, please provide the following: (1) all supporting workpapers and all spreadsheets with formulas intact, data, and other documents showing in detail how the \$522,000 in claimed savings was calculated, and (2) a copy of all invoices rendered by Stand Energy to the Kentucky State Reformatory for natural gas service.


Response: Responder: Mark Ward. Objection. Stand Energy's Customer Privacy Policy does not allow the release of specific customer information unless the release is specifically approved by an authorized Customer representative in writing or pursuant to a duly issued subpoena. Louisville Gas & Electric Company can obtain this information from our customer, or issue a subpoena which Stand Energy will forward to the Attorney General to review and address.


John M. Dosker, Attorney

2. On unnumbered page 9 of 13 of Mark Ward's testimony, he states that "We also serve a large motel complex in the Louisville area. Since January 2009 the account has saved close to \$35,000 over what they would have paid LG&E for tariff gas." For the period indicated by Stand Energy, please provide the following: (1) all supporting workpapers, and all spreadsheets with formulas intact, data and other documents showing in detail how the \$35,000 in claimed savings was calculated, and (2) a copy of all invoices rendered by Stand Energy to the motel complex for natural gas service.

Response: Responder: Mark Ward. Objection. Stand Energy's Customer Privacy Policy does not allow the release of specific customer information unless the release is specifically approved by an authorized Customer representative in writing or pursuant to a duly issued subpoena. Louisville Gas & Electric Company can obtain this information from our customer, or issue a subpoena which Stand Energy will move to quash.


John M. Dosker, Attorney



John M. Dosker



Mark T. Ward

**STATE OF OHIO
COUNTY OF HAMILTON**

Signed and sworn to before me, a Notary Public for the State of Ohio by John M. Dosker and Mark T. Ward, personally known to me, who stated that these responses were prepared by them on behalf of Stand Energy Corporation and that the responses are true and accurate to the best of their knowledge, information and belief formed after a reasonable inquiry.

My commission expires: 2-7-2011.



NOTARY PUBLIC STATE-AT-LARGE.

KATHY L. KELLEMS
Notary Public, State of Ohio
My Commission Expires
February 7, 2011