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RECEIVED

August 20, 2010

AUG 20 2010

Via Hand-Delivery

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

PUBLIC SERVICE
COMMISSION

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 second data requests to:

- LG&E
- Columbia Gas of Kentucky
- Atmos Energy; and
- Duke Energy Kentucky

Please place the documents of file.

Regards,



Matthew Malone

C: File; Parties

RECEIVED

AUG 20 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 SECOND 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 second 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.

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 LG&E 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 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.

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 second 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 20th day of August, 2010.

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SOUTHSTAR ENERGY SERVICES, LLC
and
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VECTREN SOURCE

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

GENERAL REQUESTS TO LG&E

1. Please refer to p. 37, line 20 of LG&E's testimony where it is indicated that expanded retail marketing may negatively impact school tax revenue. Please answer the following:
 - a. Please identify whether or not you are a tax professional, accounting professional or attorney?
 - b. If the answer to question (a) is in the affirmative for any one or more categories, is your statement your professional or legal conclusion?
 - c. If the answer to question (a) is negative, upon what authority do you base your opinion?
 - d. Likewise, please refer to Columbia Gas Witness Judy Cooper's data request response no. 5 to the Commission Staff wherein she indicated, "[t]here have not been any negative impacts on franchise and school tax revenues as a result of the Choice Program." Does LG&E agree with Witness Cooper that a properly structured purchase of receivables (POR) such as the program currently in place by the Columbia Choice Program would alleviate any potential concern of school or franchise tax revenues being negatively impacted by a Choice program?

2. Please refer to p. 28, lines 1-4 where LG&E's testimony where it recommended 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." Does LG&E believe that by limiting the number of potential suppliers such a rule would benefit the natural gas customers of Kentucky?
 - a. Given LG&E's opinion to the Commission Staff in response to question no. 2 that, "such a rule could enhance the level playing field in which entities would compete in a retail choice program" would LG&E endorse similar limitations for any natural gas marketer affiliates, if any established now or hereafter, associated with LG&E, E.ON or PPL in LG&E's Kentucky territory?

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to LG&E
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- b. Would LG&E be willing to provide all approved suppliers access to the same customer information the utility has access to so that a "level playing field" would exist between the utility and competitive suppliers?