

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In The Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Gas Rates.)))	Case No. 12-1685-GA-AIR
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.)))	Case No. 12-1686-GA-ATA
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan for Gas Distribution Service.))))	Case No. 12-1687-GA-ALT
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval To Change Accounting Methods)))	Case No. 12-1688-GA-AAM

**RESPONSES OF STAND ENERGY CORPORATION TO DUKE
ENERGY OHIO'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

II. INTERROGATORIES

1. Identify each person who answered or furnished information or documents, or assisted in answering or in furnishing any information or documents, used in answering any of these Interrogatories and/or Requests for Production of Documents, and identify each Interrogatory and/or Document Request for which such person participated in the response.

RESPONSE: John Dosker of Stand Energy Corporation was the primary person responsible for providing answers to all discovery requests herein.

2. Identify each person whom Stand intends to call to testify at the hearings in the above captioned matters. To the extent Stand claims that it has not made a final determination as to which witnesses it intends to call to testify on its behalf, please supplement this response as soon as such a determination is made.

RESPONSE:

Stand Energy has not yet identified its witness(es) if any, that will be testifying in this proceeding.

3. For each person identified in response to Interrogatory No. 2 above, please state (1) the subject matter upon which the witness is expected to testify; (2) the facts to which each witness is expected to testify; (3) the opinions to be rendered by each witness; (4) a summary of the witness's qualifications to provide the testimony; and (5) a summary of each witness's testimony. To the extent Stand claims that it has not made a final determination as to witnesses it intends to call to testify, please supplement this response as soon as such a determination is made.

RESPONSE:

See Response to Interrogatory No. 2, above.

4. Please identify each expert whom Stand has retained or is in the process of retaining to testify in the above-captioned proceedings. If the response indicates that a decision has not been made, please supplement the response as soon as the decision is made.

RESPONSE:

Stand Energy has not retained an expert to testify in this proceeding.

5. For each expert identified in response to Interrogatory No. 4 above, please state (1) the subject matter upon which the witness is expected to testify; (2) the facts to which each expert is expected to testify; (3) the opinions to be rendered by each expert; (4) a summary of the expert's qualifications to provide the testimony; and (5) a summary of each expert's testimony.

RESPONSE:

See Response to Interrogatory No. 4, above.

6. For each witness identified in response to Interrogatory Nos. 2 and 4 above, please identify all proceedings in all jurisdictions in which the witness has offered evidence, including but not limited to, pre-filed testimony, sworn statements, and live testimony. For each response, please provide the following:
- (a) the jurisdiction in which the testimony or statement was pre-filed, offered, given, or admitted into the record;
 - (b) the administrative agency and/or court in which the testimony or statement was pre-filed, offered, admitted, or given;
 - (c) the date(s) the testimony or statement was pre-filed, offered, admitted, or given;
 - (d) the identifying number for the case or proceeding in which the testimony or statement was pre-filed, offered, admitted, or given;
 - (e) whether the witness was cross-examined; and

- (f) the custodian of the transcripts and pre-filed testimony or statements for each proceeding.

RESPONSE:

N/A.

- 7. Please identify any and all experts with whom Stand has consulted or asked to prepare any analysis, of any kind since January 1, 2010, related to any of the following topics, regardless of whether Stand intends to call such expert to testify in the above-captioned proceedings.

- (a) the determination of operating income and rate base in any gas distribution rate case;
- (b) rate of return in any gas distribution rate case;
- (c) rates and/or tariff adjustment in any gas distribution rate case;
- (d) manufactured gas plant history and expense recovery; or
- (e) review of gas utility management/operations; and,
- (f) return on equity in any gas distribution rate case.

RESPONSE:

Stand Energy is not aware of any expert witness that meets this description.

- 8. For each expert identified in Interrogatory Nos. 4 and 7 above, please identify all documents provided by Stand to the expert.

RESPONSE:

See Response to Interrogatory No. 7, above.

9. Please state whether any of the experts identified in response to Interrogatory Nos. 4 and 7 have presented any speeches or written any articles, papers, treatises, books, memoranda or white papers relating to gas utility operating income and/or rate base; rates of return; rate and tariff adjustments; manufactured gas plant site history and/or expense recovery; review of utility management/operations; and return on equity (hereinafter collectively referred to as "Article").

RESPONSE:

See Response to Interrogatory No. 7, above.

10. If the response to Interrogatory No. 9 above is in the affirmative, please state for each expert:
- (a) the title of each such Article;
 - (b) the date of each such Article;
 - (c) the publication of each such Article;
 - (d) the name, volume, and number of the journal or other compendium where the Article appears.

RESPONSE:

N/A.

11. For each expert or expert witness identified in response to Interrogatory Nos. 4 and 7 above, please identify all documents relating to the anticipated expert testimony, including, without limitation, all expert reports, statements, and/or

notes or other documents, and any correspondence, communications, or other documents exchanged between Stand and the expert.

RESPONSE:

N/A.

12. Identify all documents or other evidence that Stand may seek to introduce as exhibits or for purposes of witness examination in any proceeding related to the above-captioned matters.

RESPONSE:

Stand Energy has not determined which documents, if any, it will introduce as Exhibits in this proceeding.

13. Provide a list of each meeting, teleconference, or communication (written or oral), between Stand and any Intervening Party, or member of any Intervening Party, regarding the any or all of the components of the gas distribution rate case described in the above-referenced matters. For purposes of this Interrogatory, "Intervening Party" includes any party to have filed a motion to intervene in the above-captioned proceedings and "List" means to identify the date of each meeting, teleconference, or communication and the person in attendance at same.

RESPONSE:

No such communications have been held by Stand Energy Corporation with any intervenor in this case or anyone purporting to act on behalf of any intervenor in this case.

14. State whether there are any agreements between Stand and any Intervening Party to the above-captioned proceeding(s), or any member or affiliate of an Intervening Party to the proceeding(s), that concern said proceeding(s). "Agreements" mean written or oral terms agreed upon by the participants and include, but are not limited to, protective agreements, confidentiality agreements, joint defense agreements, agreements to support or oppose any item or position, and any other commitments made between/among Stand and any Intervening Party/Parties. For purposes of this Interrogatory, "Intervening Party" includes any party to have filed a motion to intervene in the above-captioned proceedings.

RESPONSE:

To date, Stand Energy has not signed a Joint Defense Agreement with any intervening party relative to this case.

15. If the answer to Interrogatory No. 14, above, is in the affirmative, please identify each agreement and the other parties to same.

RESPONSE:

See Response to Interrogatory No. 14, above.

16. List all proceedings concerning gas distribution rates in which Stand has participated as the applicant, a joint applicant, or an intervenor. For purposes of this Interrogatory, "list" shall include the case name, case number, and jurisdiction in which matter is or was pending.

RESPONSE:

Objection. This Interrogatory is overly broad and unduly burdensome considering Stand Energy Corporation is operating in 14 states and has been marketing natural gas for over 28 years since 1984. Stand Energy has not retained rate case records in such a way as to make this response capable of an internal electronic search and response. As much or more effort would be required on Stand Energy's part to answer this interrogatory than would be required of Duke Energy Ohio to obtain the same information performing an electronic search of each State Public Utility/Service Commission website where Stand Energy does business.

17. List all witnesses who testified on behalf of Stand in respect of each proceeding identified in Interrogatory No. 16. For purposes of this Interrogatory, "list" shall include the witness's name, business address, occupation, and relation to Stand.

RESPONSE:

See Response to Interrogatory No. 16 above. Witnesses, if any, that testified on behalf of Stand Energy Corporation in cases responsive to Interrogatory No. 16 above, can be found in the public record by reviewing each electronic docket in the applicable state proceedings.

18. Has Stand made any presentations or prepared any documents, summaries, analysis, or evaluation in the past three (3) years regarding any of the following topics:

- (a) the determination of operating income and rate base in any gas distribution rate case;
- (b) rate of return in any gas distribution rate case;
- (c) rates and/or tariff adjustment in any gas distribution rate case;
- (d) manufactured gas plant history and expense recovery; or
- (e) review of gas utility management/operations; and,
- (f) return on equity in any gas distribution rate case.

If so, please identify the specific topics on which such presentations were made or such summaries, analyses, or evaluations prepared.

RESPONSE:

Stand Energy has not prepared any formal documents, summaries, analyses or evaluation on the topics listed above over the last 3 years.

19. Please state whether you agree to supplement your responses these Interrogatories and Document Requests.

RESPONSE:

Yes. Stand Energy will supplement its responses to the extent required by applicable law.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Duke Energy Ohio requests that Stand produce true and accurate copies of the following documents:

1. Produce all work papers, analysis, drafts, and other support for any adjustments or recommendations made by a witness that are in the possession, custody, or control of Stand, regardless of the person or entity to have prepared said documents.

RESPONSE:

N/A

2. Produce all data supporting any return on equity analysis in the possession, custody, or control of Stand, regardless of the person or entity to have prepared said analysis.

RESPONSE:

N/A

3. Any and all documents identified or referenced in response to any of the foregoing Interrogatories.

RESPONSE:

N/A/.

4. Any and all documents that contain any information used, reviewed, or referenced in preparing Stand's responses to any of the foregoing Interrogatories.

RESPONSE:

N/A

5. Any and all documents that Stand may introduce as exhibits or use for purposes of witness examination at any hearing related to the above-captioned matters.

RESPONSE:

N/A

6. For each and every expert identified in Interrogatory No. 7, please provide a copy of any analysis or opinion rendered by said expert on behalf of Stand related to the topics listed in Interrogatory No. 7.

RESPONSE:

N/A.

7. For each and every expert identified in Interrogatory No. 7, please provide a copy of any analysis or opinion rendered by said expert in a prior proceeding, prior testimony offered, analysis, reports and memoranda prepared, as well as positions and articles related to manufactured gas plant site history and expense recovery.

RESPONSE:

N/A/.

8. Any and all documents relating to the testimony of any of Stand's witnesses and/or expert witnesses including, but not limited to, any and all *curricula vitae*, reports, papers, statements, notes, other documents, and any correspondence, communications, or other documents exchanged between Stand and the expert.

RESPONSE:

N/A.

9. Any and all contracts for services between Stand and any expert retained or consulted to provide opinions, testimony, evidence, or analysis in relation to the above-captioned proceedings.

RESPONSE:

10. Please provide copies of any documents/agreements identified in Interrogatory No. 15.

RESPONSE:

N/A.

11. Please provide copies of any transcripts of depositions of each witness identified in Interrogatory No. 17. If a transcript is not available, please provide the name,

address, and telephone number of the court reporting service used for purposes of each deposition.

RESPONSE:

Stand Energy does not retain copies of depositions taken in regulatory matters once the case is resolved. Determining the identity of each Court Reporter in those cases where depositions of Stand witnesses were taken, would be unduly burdensome upon Stand Energy. The identity of the relevant Court Reporter may be available on each State's Public Utility Commission website.

12. Please provide copies of all such presentations, summaries, analyses, or evaluations identified in Interrogatory No. 18.

RESPONSE:

N/A.

13. Please provide copies of any and all documents, notes, presentations, and correspondence (including but not limited to, letters, emails, telephone transcripts, etc.) between Stand and any of the Intervening Parties, between January 1, 2010 and the present date regarding any or all of the issues raised in the above-captioned proceedings. For purposes of this Document Request, "Intervening Party" means any party to have filed a motion to intervene in the captioned proceedings.

RESPONSE:

No documents or communications of any kind with any other intervenor once filing for intervention occurred.

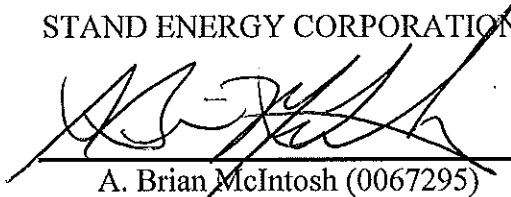
14. Please produce and attach true and accurate copies of all documents discussing, detailing, identifying, or relating to how the return on equity identified in Interrogatory No. 7 was calculated and/or quantified.

RESPONSE:

N/A.

Respectfully submitted,

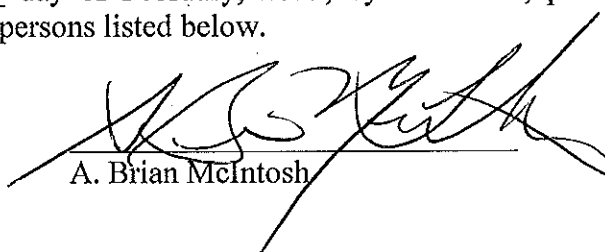
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served this 12th day of February, 2013, by U.S. mail, postage prepaid, or by electronic mail upon the persons listed below.



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Case No(s). 12-1685-GA-AIR, 12-1686-GA-ATA, 12-1687-GA-ALT, 12-1688-GA-AAM

Summary: Response Responses of Stand Energy Corporation to Duke Energy Ohio's First Set of Interrogatories and Requests for Production of Documents. electronically filed by Mr. John M. Dosker on behalf of McIntosh, Brian Mr.