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JUL 12 2011

PUBLIC SERVICE  
COMMISSION

JACK B. BATES

IRIS G. SKIDMORE

**Via Hand-Delivery**

July 12, 2011

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

**Re: Case No. 2011-00161: The Application of Kentucky Utilities Company for  
Certificates of Public Convenience and Necessity and Approval of its 2011  
Compliance Plan for Recovery by Environmental Surcharge**

Dear Mr. Derouen:

Enclosed for filing in the above styled action are an original and ten copies of Initial Requests for Information on Behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. to Applicant Kentucky Utilities Company.

Sincerely,

  
Iris G. Skidmore

Enclosure

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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JUL 12 2011

In the Matter of:

THE APPLICATION OF KENTUCKY UTILITIES )  
COMPANY FOR CERTIFICATES OF PUBLIC )  
CONVENIENCE AND NECESSITY AND APPROVAL )  
OF ITS 2011 COMPLIANCE PLAN FOR RECOVERY )  
BY ENVIRONMENTAL SURCHARGE )

PUBLIC SERVICE  
COMMISSION

Case No. 2011-00161

**INITIAL REQUESTS FOR INFORMATION ON BEHALF OF CAC  
TO APPLICANT KENTUCKY UTILITIES COMPANY**

\* \* \* \* \*

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and submits the following Initial Requests for Information to Applicant Kentucky Utilities Company (hereinafter "KU"):

In your responses to each question, please identify the witness(es) answering each question.

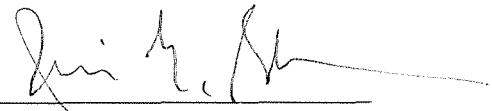
1. On Pages 6-7 of the Direct Testimony of Robert M. Conroy, Mr. Conroy estimates the financial impacts of the projects proposed in the application on KU's customers. The residential customer impact is listed for monthly bills for years 2012-2016 based on using 1000 kWh per month. Is the actual average monthly residential usage 1,000 kWh? If not, what is the average monthly usage in kWh of KU's residential customers? Based on the actual average monthly usage, what is the residential customer impact on monthly bills for each of the years 2012-2016 in percentage increases and actual dollars?

2. Has KU performed a study to determine how the financial impact of the proposed environmental surcharges for the years 2012-2016 (detailed in the direct testimony of Robert M. Conroy) on residential customers living at or below the federal poverty level will affect the

number of shut-offs performed by KU on a monthly or annual basis? If the answer is yes, what is the conclusion of the study? If the answer is no, why has such a study not been performed?

3. How will KU lessen the burden of the financial impacts of the proposed environmental surcharges (detailed in the direct testimony of Robert M. Conroy) on its most vulnerable residential customers, those living at or below the federal poverty level?

Respectfully submitted,



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COUNSEL FOR CAC

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2011, a true and accurate copy of the foregoing Initial Requests for Information on Behalf of CAC to Applicant Kentucky Utilities Company was served by United States mail, postage prepaid, to the following:

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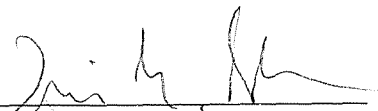
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