

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION)
OF THE FUEL ADJUSTMENT CLAUSE OF)
THE UNION LIGHT, HEAT AND POWER) CASE NO. 2000-517
COMPANY FROM NOVEMBER 1, 1998)
TO OCTOBER 31, 2000)

COMMISSION STAFF'S FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE UNION LIGHT, HEAT AND POWER COMPANY

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that The Union Light, Heat and Power Company ("ULH&P") file the original and 4 copies of the following information with the Commission within 7 days of this request, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Provide Cincinnati Gas and Electric Company's ("CG&E") wholesale tariff, Revised Sheet No. 5, Rate WS-P, under which ULH&P is served. Provide the tariff

sheets that were in effect at December 31, 1999, January 1, 2000, and February 1, 2000.

2. Provide CG&E's wholesale tariff, Revised Sheet No. 7A, Fuel Cost Adjustment. Provide the tariff sheets that were in effect at December 31, 1999, January 1, 2000, and February 20, 2000.

3. Provide ULH&P's tariff, Revised Sheet No. 80, Fuel Cost Adjustment Rider F. Provide the tariff sheets that were in effect between January 1, 2000 and October 31, 2000.

4. Explain in detail whether ULH&P's fuel adjustment clause ("FAC") as billed to its retail customers conformed to terms of ULH&P's Fuel Cost Adjustment Rider F tariff for each month of the 2-year period November 1, 1998 to October 31, 2000.

5. Refer to ULH&P's FAC Rider F. Provide a schedule which shows the following information for each month of the 2-year period under review:

a. The average monthly cost of fuel charged by ULH&P's electrical energy supplier.

b. The cost of fuel per kilowatt-hour of sales established in the base period.

c. The fuel cost in the current period.

d. The level of sales in the current period.

e. The quotient of the fuel cost in the current period divided by the level of sales in the current period.

f. The difference between the number derived in response to (e), above, and the cost of fuel per kilowatt-hour of sales established in the base.

6. Provide the amount of fuel cost charged to ULH&P for the period from January 1, 2000 through October 31, 2000. This information should be provided monthly and in total for the 10-month period showing (1) ULH&P's kilowatt-hour purchases, (2) the amount of fuel cost charged through CG&E's wholesale base energy rate, and (3) the amount of fuel cost charged through CG&E's wholesale fuel cost adjustment.

7. Provide the amount of fuel cost charged to ULH&P's retail ratepayers for the period from January 1, 2000 through October 31, 2000. This information should be provided monthly and in total for the 10-month period showing (1) ULH&P's calculated kilowatt-hour sales to retail customers, (2) the amount of fuel cost charged through ULH&P's base energy rates, and (3) the amount of fuel cost charged through ULH&P's FAC.

8. Refer to Item 4 of ULH&P's information response filed January 2, 2001. Provide the base fuel cost amount for ULH&P reflecting the calculated decrease of 0.5456 cents per kilowatt-hour as stated in that response.



Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602

DATED: January 30, 2001

cc: Parties of Record