## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF	)	
THE FUEL ADJUSTMENT CLAUSE OF	)	CASE NO.
KENTUCKY UTILITIES COMPANY FROM	)	2002-00433
NOVEMBER 1, 2000 TO OCTOBER 31, 2002	ĺ	

## COMMISSION STAFF S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO KENTUCKY UTILITIES COMPANY

Pursuant to 807 KAR 5:001, Commission Staff requests that Kentucky Utilities Company (KU) file the original and 8 copies of the following information with the Commission no later than February 10, 2003, with a copy to all parties of record. Each copy of the information requested shall 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 shall 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. When applicable, the requested information shall be provided for total company operations and jurisdictional operations, separately.

1. Provide a schedule of all synfuel product purchases during the 2-year review period for use at KU generation stations as fuel in the same format as the Analysis of Fuel Purchases Section of the monthly Fuel Adjustment Clause backup report. This schedule should indicate the location or point of origin of the synfuel.

- Describe KUs use of synfuel products at its generation stations since
   This description should include an assessment of all benefits and problems associated with the use of these products.
- Refer to KUs Response to the Commission's Order of December 13,
   2002, Item 13(b).
- a. Describe KUs efforts, if any, to outsource to independent contractors responsibility for the maintenance of its distribution and transmission system.
- b. Describe any changes in service quality or costs resulting from KUs efforts to outsource to independent contractors responsibility for the maintenance of its distribution and transmission system.
- 4. Refer to KU's Response to the Commission's Order of December 13, 2002, Item 5.
- a. List the reasons for the projected increases in KUs fuel requirements.
- b. Provide a comparison of KU s fuel requirements in tons and dollars for 2001, 2002, 2003 (projected), and 2004 (projected).
- 5. Refer to KUs Response to the Commission's Order of December 13, 2002, Item 13 at 14. Describe the problem that created the super heater tube leaks that caused several hours of forced outages at Ghent Unit 1 during May and June 2002.
- 6. Refer to KU's Response to the Commission's Order of December 13, 2002, Item 15.
- a. Describe KUs strategy for replacing the 15 long-term coal supply contracts that expired in 2002 or will expire in 2003.

KUs fuel supply contract with Vandetta Company (KUF00770) b.

provided for annual deliveries of 342,000 tons. During the period from September 1,

2000 through October 31, 2002, only 51,239 tons were delivered. State whether KU

expects to receive additional deliveries under the contract and describe the actions that

KU intends to take to obtain contract deliveries.

Explain why only 17 percent of contracted deliveries occurred C.

under KU's coal supply contract with Smokey Mountain Coal Corporation (KUF02860)

during the 10-month period ending October 31, 2002. State when KU expects this

supplier to meet the delivery requirements of the contract.

7. Explain why KU proposes no changes to the rates contained in its

Decorative Street Lighting, Private Outdoor Lighting, or Customer Outdoor Lighting

Schedules.

Refer to KUs Response to the Commission's Order of December 13, 8.

2002, Item 30.

a. Identify all positions and describe the duties of each position that

Gerard Haimberger held with KU during the review period.

For each position listed above, state the name and position of the b.

person to whom Mr. Haimberger reported.

Thomas M. Dorman Executive Director

Public Service Commission

P. O. Box 615

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DATED: \_\_January 31, 2003\_

CC: Parties of Record