## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF ) THE FUEL ADJUSTMENT CLAUSE OF ) LOUISVILLE GAS AND ELECTRIC COMPANY ) CAS FROM NOVEMBER 1, 2000 TO OCTOBER 31, ) 2002 )

CASE NO. 2002-00434

## <u>COMMISSION STAFF S INTERROGATORIES AND REQUESTS</u> <u>FOR PRODUCTION OF DOCUMENTS TO</u> <u>LOUISVILLE GAS AND ELECTRIC COMPANY</u>

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Louisville Gas and Electric Company (LG&E) 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 LG&E 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 LG&E s 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 LG&E s Response to the Commission s Order of December 13,
2002, Item 5.

a. List the reasons for the projected increases in LG&Es fuel requirements for 2003 and 2004.

b. Provide a comparison of LG&Es fuel requirements in tons and dollars for 2001, 2002, 2003 (projected), and 2004 (projected).

4. Refer to LG&E s Response to the Commission s Order of December 13, 2002, Item 13. As this response provides LG&E s line losses for the 2-year period ending October 31, 2000, it is unresponsive. Provide LG&E s line losses for the review period.

5. Refer to LG&E's Response to the Commission's Order of December 13, 2002, Item 14 at 4 5.

a. State whether, since October 31, 2002, Cane Run Unit 6 has experienced any problems similar to those which it experienced from May 2002 to September 2002 and which resulted in extended forced outages.

b. If such problems have occurred, state the actions that LG&E has taken to correct the problem and explain whether such actions have been effective.

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Refer to LG&E s Response to the Commission s Order of December 13, 2002, Item 13(b).

a. Describe LG&Es 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 LG&Es efforts to outsource to independent contractors responsibility for the maintenance of its distribution and transmission.

 Refer to LG&E s Response to the Commission s Order of December 13, 2002, Item 15.

a. Describe LG&E s strategy for replacing the 8 long-term coal supply contracts that expired in 2002 or will expire in 2003.

b. Refer to LG&Es response at page 17. During the period from January 1, 2001 through October 31, 2002, no deliveries were made to LG&E under its fuel supply contract with Vandetta Company. State whether LG&E expects to receive additional deliveries under the contract and describe the actions that LG&E intends to take to obtain contract deliveries.

8. Explain why LG&E proposes no changes to the rates contained in its Outdoor Lighting and Private Outdoor Lighting Schedules.

Refer to LG&E s Response to the Commission s Order of December 13,
2002, Item 30.

a. Identify all positions and describe the duties of each position that Gerard Haimberger held with LG&E during the review period.

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b. For each position listed above, state the name and position of the person to whom Mr. Haimberger reported.

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

DATED: <u>January 31, 2003</u>

cc: Parties of Record