

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION OF THE APPLICATION OF )  
THE FUEL ADJUSTMENT CLAUSE OF )  
KENTUCKY UTILITIES COMPANY FROM MAY 1, ) CASE NO. 2005-00496  
2005 THROUGH OCTOBER 31, 2005 )

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

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Kentucky Utilities Company ("KU") file the original and 5 copies of the following information with the Commission within 10 days of the date of this request, 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.

1. Refer to Item 2 of the response to the Commission's December 27, 2005 Order ("December 27 Order"). During the period under review, the E.W. Brown generating station operated at a capacity factor of 47 percent.

a. Does KU consider the 47 percent capacity factor low for the E.W. Brown station?

b. If the answer to 1(a) is yes, explain why the capacity factor was low during this period.

2. Refer to Item 3 of the response to the December 27 Order.

a. Provide the current status of the firm power commitment between KU and Owensboro Municipal Utilities ("OMU").

b. Describe KU's plans for replacing the 200 MW of baseload power lost due to termination of the agreement with Electric Energy, Inc.

3. Refer to Item 4 of the response to the December 27 Order. For the months of May, June and July of 2005, sales are shown to various other companies, in addition to OMU, Louisville Gas and Electric Company ("LG&E"), and the Midwest Independent System Operator ("MISO"). Beginning in August 2005, the only sales shown are to OMU, LG&E and MISO. Explain why there were no sales to companies other than OMU, LG&E and MISO after July of 2005.

4. Refer to Item 6 of the response to the December 27 Order. Twenty contracts are shown as expiring on December 31, 2005. Explain how KU has replaced, or plans to replace, the coal delivered under the expiring contracts. Explain whether any contracts were extended, or if the expiring contracts have been replaced with new contracts or spot purchases. If contracts have been extended, identify the extended contracts and provide the length of the extension period.

5. Refer to Item 17 of the response to the December 27 Order. For the selected vendors only, provide the following information:

- a. Vendor name.
- b. Starting date and length of contract.
- c. Annual tonnage.
- d. Base price.



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Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED: February 13, 2006

cc: Parties of Record