COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY TO FILE DEPRECIATION STUDY) ()	CASE NO. 2007-00565
APPLICATION OF KENTUCKY UTILITIES COMPANY FOR ADJUSTMENT OF OF ELECTRIC BASE RATES)	CASE NO. 2008-00251

FIRST DATA REQUEST OF COMMISSION STAFF TO COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON, HARRISON, AND NICHOLAS COUNTIES, INC.

Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. ("CAC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due not later than December 3, 2008. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, shall be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and

accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

CAC shall make timely amendment to any prior responses if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which CAC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. 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 separately provided for total company operations and jurisdictional operations.

- 1. Page 4 of the Testimony of Jack E. Burch ("Burch Testimony") states that the KU Home Energy Assistance ("HEA") program serves 1,300 KU customers. Page 8 of the Burch Testimony states that the program is able to serve 1,600 KU customers. State which total number of KU customers served is accurate.
- 2. Page 8 of the Burch Testimony states that increasing the HEA meter charge would allow expansion of services to approximately 4,000 additional customers.

 Mr. Burch also states on page 8 that the administering community action agencies have

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3. a waiting list of approximately 486 families. Explain why there is a need to expand services to 4,000 families if the current waiting list is 486 families.

Stephanie Stumbo Executive Director

Public Service Commission

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