COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF)	CASE NO. 2009-00548
)	
BASE RATES		

FOURTH DATA REQUEST OF COMMISSION STAFF TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), 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 10 days from the date of this request. 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 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, 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.

KU shall make timely amendment to any prior response 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 KU 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. Refer to the letter submitted by KU on April 19, 2010, regarding the revisions to Exhibit 1, Reference Schedule 1.16.
- a. Explain why the amount of the 2009 Winter Storm Restoration regulatory asset decreased from \$3,464,137 to \$3,461,562.
- b. Explain whether the differences in the adjustments for labor and labor-related costs in the letter of \$754,418 from the amounts of \$793,717 in Rives Exhibit 1, Reference Schedule 1.16, are or are not related to the change in the regulatory asset amount.
- c. Provide an updated version of Exhibit 1, Reference Schedule 1.16, which shows the derivation of the amounts contained in the letter.
- 2. In addition to the revisions presented in its April 19, 2010 letter, KU previously noted errors in the exhibits included in its application in various responses to data requests from Commission Staff and intervenors. Provide an updated version of all affected exhibits and schedules to the Rives Testimony reflecting the impact of the revisions noted in the letter and the revisions noted previously in KU's responses to data requests.

- 3. Refer to page 2 of 2 of the attachment to the response to Item 1 of the Attorney General's supplemental request for information, which shows the increase in the number of customers assessed late-payment penalties which began in April 2009 after the Customer Care System ("CCS") became operational.
- a. Provide, as of the most recent date for which such information is available, the number of customers enrolled in the FLEX program.
- b. Provide the number of customers as of March 2009 whose bill due date was modified under Extendicare, Select Due Date, or a similar program.
- c. For the test year, provide a schedule which shows what the impact would have been on KU's late-payment penalty revenues if the number of days before such penalties were assessed had been 21, rather than 15, days from the date of billing. Describe the other financial impacts, if any, of extending the number of days from 15 to 21 before late-payment penalties would be assessed.
- d. Explain whether the new CCS can accommodate a bill due date that does not change from month to month.
- 4. Refer to the response to Item 6 of the Association of Community Ministries' Second Request in Case No. 2009-00549¹ in which KU's sister company, Louisville Gas and Electric Company, states "[t]he Company believes there is no need to change the deposit installment options currently available to customers required to make a deposit as a condition of reconnection." State whether KU likewise believes

¹ Case No. 2009-00549, Application of Louisville Gas and Electric Company for an Adjustment of Electric and Gas Base Rates, filed Mar. 15, 2010.

there is no need to change the deposit installment options currently available to its customers.

Jeff Derouen

Executive Director
Public Service Commission

P. O. Box 615

Frankfort, Kentucky 40602

DATED: __APR 3 0 2010

cc: Parties of Record

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