

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION **RECEIVED**

In the Matter of:

JAN 20 2005

Investigation into the Membership of
Louisville Gas and Electric Company
and Kentucky Utilities Company in the
Midwest Independent Transmission
System Operator, Inc.

PUBLIC SERVICE
Case No. 2003-00266 COMMISSION

**Data Requests to LG&E and KU from
Midwest Independent Transmission System Operator, Inc.**

The Midwest Independent Transmission System Operator, Inc. ("Midwest ISO"), pursuant to the Commission's scheduling orders, hereby submits the attached data requests to Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU"). For the purpose of these requests, the Midwest ISO refers LG&E and KU to the instructions accompanying its previous initial and supplemental data requests, filed October 6 and October 30, 2003, respectively. The acronyms and capitalized words used in the attached set of data requests are as defined or used in the supplemental rebuttal testimony filed by the LG&E/ KU on January 10, 2005.

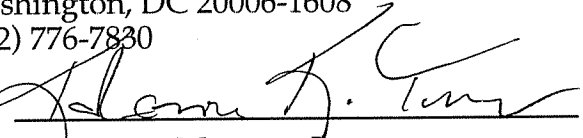
The Midwest ISO submits these basic data requests addressed to the LG&E/ KU supplemental rebuttal testimony as a precaution. It has this date filed and served a Motion to Suspend Deadlines regarding Discovery Requests. If a general suspension is not granted, the Midwest ISO will request leave to propound data requests in addition to these basic requests.

Respectfully submitted,

Katherine K. Yunker
Benjamin D. Allen
YUNKER & ASSOCIATES
P.O. Box 21784
Lexington, KY 40522-1784
(859) 255-0629
fax: (859) 255-0746

Stephen G. Kozey
James C. Holsclaw
MIDWEST INDEPENDENT TRANSMISSION
SYSTEM OPERATOR, INC.
701 City Center Drive
Carmel, IN 46032
(317) 249-5769

Stephen L. Teichler
DUANE MORRIS, LLP
1667 K. Street N.W., Suite 700
Washington, DC 20006-1608
(202) 776-7830

By: 
ATTORNEYS FOR MIDWEST INDEPENDENT
TRANSMISSION SYSTEM OPERATOR, INC.

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this the 20th day of January, 2005, the original and six (6) copies of these Data Requests were hand-delivered to the Commission for filing. A copy has also been sent, via U.P.S., to:

Beth Cocanougher
LG&E ENERGY CORP.
220 West Main St.
P.O. Box 32030
Louisville, KY 40232-2030

Elizabeth E. Blackford
Assistant Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive; Suite 200
Frankfort, KY 40601-8204

Kendrick R. Riggs
OGDEN NEWELL & WELCH PLLC
1700 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202

David C. Boehm
BOEHM, KURTZ & LOWRY
Suite 2110 CBLD Building
36 East Seventh Street
Cincinnati, OH 45202


Attorney for Midwest Independent
Transmission System Operator, Inc.

1. Provide all supporting studies, derivations, or workpapers for the supplemental rebuttal testimony and any analyses presented.
2. Provide all data, input files, intermediate results, or other information necessary to replicate the analyses presented.
3. To the extent not already identified in response to Data Requests 1 and 2, identify the source of any numerical data (historical, projected, or estimated) used in the analyses presented.
4. Provide all supporting studies, derivations, or workpapers for each numerical data or assumption used in the analyses presented by Mathew J. Morey for which LG&E/KU was the source.
5. Provide a copy of, or make available for inspection and copying, each and every document relied upon by Mathew J. Morey and Susan F. Tierney in the preparation of their respective supplemental rebuttal testimony.
6. Does LG&E/KU contend that the generating units operated by WKE cannot or should not be jointly dispatched and, if necessary, dynamically scheduled with LG&E/KU units? If so, provide the basis for that contention.
7. Describe the relationship between WKE and LG&E or KU with respect to the control and dispatch of the western Kentucky units operated by WKE.
8. Dr. Morey attributes the difference in exit fee costs for the Midwest ISO and LG&E/KU analyses to “differences in assumptions about the billing determinants that are the basis for calculating the Companies’ share of the unamortized capital costs under Schedules 10, 16 and 17.” (MJM Supp. Rebuttal at 15 *ll.* 3-5). State each difference in assumptions, and for each difference stated provide the basis for the assumption(s) used in the LG&E/KU analysis.