



Cinergy Services, Inc.
139 East Fourth Street
P.O. Box 960
Cincinnati, OH 45201-0960

VIA OVERNIGHT MAIL

April 20, 2005

Ms. Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

RECEIVED

APR 21 2005

PUBLIC SERVICE
COMMISSION

Re: In the Matter of the Application of The Union Light, Heat
and Power Company for a Certificate of Public Convenience and Necessity to
Construct Gas Distribution Facilities Within Its Service Territory
Case No. 2005-00094

Dear Ms. O'Donnell:

Enclosed please find an original and eight copies of the responses to the First Set of Data Requests. Please date-stamp the extra copies of this transmittal letter and return to me in the envelope provided.

Should you have any further questions, please do not hesitate to call me.

Very truly yours,

Dianne B. Kuhnell
Paralegal

Enclosures

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APR 21 2005

PUBLIC SERVICE
COMMISSION

KyPSC Staff First Set Data Requests

ULH&P Case No. 2005-00094

Date Received: April 11, 2005

Response Due Date: April 21, 2005

KyPSC-DR-01-001

REQUEST:

1. Refer to Exhibit A of the application. State whether service lines are included in the projects listed in this exhibit.

RESPONSE:

The estimated expenditures for curb-to-meter service lines are included in the projects listed in Exhibit A.

WITNESS RESPONSIBLE: Gary J. Hebbeler

KyPSC Staff First Set Data Requests
ULH&P Case No. 2005-00094
Date Received: April 11, 2005
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KyPSC-DR-01-002

REQUEST:

2. Provide the total footage and the estimated cost of service lines ULH&P is proposing to replace in 2005.

RESPONSE:

The estimated footage for curb-to-meter service lines (based on a 70-foot average) is approximately 150,000 feet. The estimated cost of curb-to-meter service lines is approximately \$1.8 million.

WITNESS RESPONSIBLE: Gary Hebbeler

KyPSC Staff First Set Data Requests
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KyPSC-DR-01-003

REQUEST:

3. Pursuant to Exhibit A of the application, ULH&P is proposing to replace 96,116 feet of facilities in 2005.
- a. State the percentage of the total footage that is (i) cast iron, (ii) bare steel, and (iii) plastic.
 - b. State the percentage of the total footage that involves insertion.
 - c. State the percentage of the total footage that involves excavation.

RESPONSE:

a.	Cast Iron	81.1%
	Bare Steel	16.7%
	Steel Welded Protective Coating	1.5%
	Copper	.4%
	Plastic	.3%

b. & c. Method of Installation:

	Direct Bury	79.7%
	Directional Drill	19.3%
	Insertion	1.0%

WITNESS RESPONSIBLE: Gary J. Hebbeler

**KyPSC Staff First Set Data Requests
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KyPSC-DR-01-004

REQUEST:

4. For all projects that involve excavation, provide the total cost of removal.

RESPONSE:

The projected cost of removal for all projects listed on Exhibit A in 2005 is approximately \$147,000.

WITNESS RESPONSIBLE: Gary J. Hebbeler