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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

JUL 08 2005

PUBLIC SERVICE
COMMISSION

IN RE THE MATTER OF:

JOINT APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY AND KENTUCKY)
UTILITIES COMPANY FOR A CERTIFICATE OF) CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR) 2005-00142
CONSTRUCTION OF TRANSMISSION FACILITIES)
IN JEFFERSON, BULLITT, MEADE, AND HARDIN)
COUNTIES, KENTUCKY)

* * * * *

INTERVENORS DENNIS AND CATHY CUNNINGHAM'S
RESPONSE TO LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY REQUEST FOR DATA

* * * * *

Come the Intervenors, Dennis L. and Cathy L. Cunningham and respectfully submit their response to Louisville, Gas and Electric Company and Kentucky Utilities Company request for data as follows:

DATA REQUESTS

DATA REQUEST NO. 1: Have you performed, requested or commissioned any review, study or analysis regarding the transmission project which is the subject of this proceeding (including, but not limited to, the need, location/route or impact of said property)? If so, produce copies of each such review, study or analysis, and any documents relating thereto, and state the name and address

of the person(s), group or entity which performed each such study or analysis.

ANSWER: Cunningham Intervenors have not performed, requested or commissioned any review, study or analysis regarding the transmission project. However, Intervenors have moved the PSC to allow this answer to be supplemented by July 11, 2005.

DATA REQUEST NO. 2: Have you retained any consultant or expert to testify in this proceeding? If so, state the name and address of such consultant or expert, produce a copy of his or her current curriculum vitae, and summarize his or her expected testimony.

ANSWER: Cunningham Intervenors have not yet retained any consultant, or expert to testify in this proceeding, and therefore cannot furnish a name, address or copy of the current curriculum vitae, nor a summarization of expected testimony. However, this is being investigated, and a motion to supplement is filed herewith.

DATA REQUEST NO. 3: Produce copies of all documents, if any, you expect or intend to offer into evidence during the public hearing of this proceeding.

ANSWER: Cunninmgham Intervenors have formally requested data from Louisville Gas and Electric Company and Kentucky Utilities on the 30th day of June, 2005. Until Intevenors have been provided these documents we are unable to respond to this request. After review of the documents requested are made available, Intervenors will have had the opportunity to review and make a decision on what documents to offer into evidence. Intervenors have moved to be allowed to supplement this response by Monday, July 11, 2005, with the documents responsive to this request.

Respectfully submitted,

W.H. GRADDY & ASSOCIATES
103 Railroad Street
P.O. Box 4307
Midway, Kentucky 40347
(859) 846-4905
hgraddy@aol.com
Counsel for Intervenors
Dennis and Cathy
Cunningham

By: 

W. Henry Graddy, IV

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed by facsimile and the original and ten (10) copies have been duly served by first-class mail upon the following individuals, and counsel for LG&E and KU, this the 7 day of July, 2005.

Hon. A.W. Turner
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602
Aw.turner@ky.gov

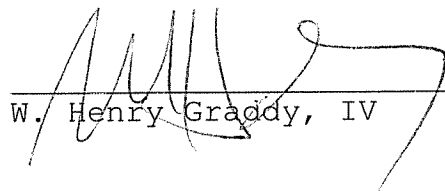
Hon. Kendrick R. Riggs
Hon. J. Gregory Cornett
Ogden, Newell & Welch PLLC
1700 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
Telephone: (502) 582-1601

Hon. Robert M. Watt, III
Hon. Lindsey W. Ingram, III
Stoll, Keenon, & Park, LLP
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507
(859) 231-3000

Hon. Elizabeth L. Cocanougher
Senior Regulatory Counsel
Louisville Gas and Electric Company
220 West Main Street
Post Office Box 32010
Louisville, Kentucky 40232
Telephone: (502) 627-4850

Counsel for Louisville Gas and Electric
Company and Kentucky Utilities Company

Hon. Greg Stumbo
Attorney General
State Capital
Frankfort, Kentucky 40601


W. Henry Graddy, IV

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