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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

JUL 13 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)

* * * * *

SUPPLEMENTAL RESPONSE TO LOUISVILLE GAS AND ELECTRIC
AND KENTUCKY UTILITIES COMPANY'S REQUEST FOR DATA

* * * * *

Come the Interveners Dennis and Cathy Cunningham and respectfully file their Supplemental Response to Louisville Gas and Electric and Kentucky Utilities Company's ("LG&E") request for data as follows:

1. Interveners identify Geoffrey M. Young, as a witness who is reviewing the above application and preparing to give direct testimony. Mr. Young is a mechanical engineer with experience in energy efficiency, and in that capacity has testified before the Public Service Commission when he was formerly employed by the Kentucky Division of Energy. A copy of Mr. Young's direct testimony will be filed with the Public Service Commission and served by July 15, 2005.
2. Interveners identify J. Phyllis Fox, Ph.D., PE, DEE, as a witness who is reviewing the above application and

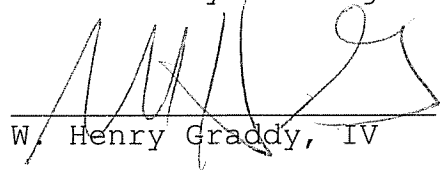
preparing to give direct testimony. Dr. Fox is an environmental engineer with experience in coal burning technology, and in that capacity has testified many times in many different legal proceedings. If the Cunningham's decide to call Dr. Fox, a copy of Dr. Fox's direct testimony will be filed with the Public Service Commission and served by July 15, 2005. Attached is page 1 of her CV, and the full CV will be provided if she is going to be called as a witness.

2. Interveners are also producing a DVD showing birds that visit the Cunningham's nature preserve. One copy of the DVD will be produced to the Public Service Commission and a copy will be provided to Robert Watt, counsel for LG&E.

Respectfully submitted,

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

By:


W. Henry Graddy, IV

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy has been duly served by first-class mail upon the following:

Hon. A.W. Turner
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602

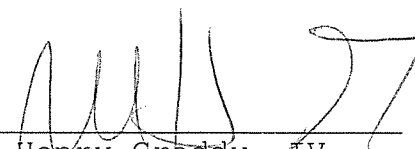
Hon. Kendrick R. Riggs
Hon. J. Gregory Cornett
Ogden, Newell & Welch PLLC
1700 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202

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

Hon. Elizabeth L. Cocanougher
Senior Regulatory Counsel
Louisville Gas and Electric Company
220 West Main Street
Post Office Box 32010
Louisville, Kentucky 40232
Counsel for Louisville Gas and Electric
Company and Kentucky Utilities Company

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

This the 12 day of July, 2005.



W. Henry Graddy, IV

**PREPARED TESTIMONY OF THE
KENTUCKY DIVISION OF ENERGY
GEOFFREY M. YOUNG**

Comes the Kentucky Environmental and Public Protection Cabinet, Department for Natural Resources, Division of Energy (KDOE), intervener herein, and offers the following prepared testimony in this case:

Q. Please state your name and place of employment.

A. My name is Geoffrey M. Young. My place of employment is the Kentucky Division of Energy, 663 Teton Trail, Frankfort, Kentucky, 40601.

Q. What is your position?

A. I am the assistant director of the division.

Q. Please describe your education and employment experience.

A. I received a bachelor's degree in Economics from the Massachusetts Institute of Technology, a master's degree in Mechanical Engineering from the University of Massachusetts, and a master's degree in Agricultural Economics from the University of Kentucky.

From 2/78 to 8/79, I worked as a Staff Engineer at Technology + Economics, a research consulting firm in Cambridge, Massachusetts. I analyzed the economic and energy savings resulting from energy efficiency technologies and prepared a commercialization plan for a low-cost passive solar heating and cooling system.

From 7/82 to 6/83, I was the Staff Engineer at the Small Business Development Center, administered by the University of Kentucky in Lexington. I performed cost-benefit analyses of energy efficiency and renewable energy technologies, provided technical assistance to small businesses, and maintained and updated a manual with descriptions of energy technologies.

From 4/90 to 9/91, I worked for the Kentucky Division of Waste Management in the Department for Environmental Protection as an Environmental Engineering Technologist Senior. I performed technical and administrative reviews of applications for hazardous waste facility permits. I provided technical assistance to field and enforcement personnel, conducted hazardous waste facility assessments, and provided information to the public.

From 9/91 to 11/94, I worked as an Environmentalist Principal at the Kentucky Division of Energy (KDOE). My major duty was to coordinate the Alternate Energy Development Program. I administered small grants for the demonstration of renewable energy technologies, developed fact sheets and other information

for the public, edited a national monthly newsletter on energy efficiency programs in the 50 states, and wrote proposals for grant funding.

I was promoted to assistant director of KDOE in November 1994. In addition to administrative duties and continuing management of the Alternate Energy Development Program, my work has focused on demand-side management, energy policy issues, energy-efficient building systems, and alternative fuels for vehicles. Since 1994, I have represented the division on Demand-Side Management Collaboratives at the Louisville Gas and Electric Company, American Electric Power Company (AEP), and Union Light, Heat and Power Company (Cinergy). I have also been the lead person for the Division in addressing electric industry regulatory issues before the Commission.

Q. Have you participated in other cases before this Commission?

Yes. I submitted prepared testimony in the following cases: Case No. 98-426, Application of Louisville Gas and Electric Company for Approval of an Alternative Method of Regulation of Its Rates and Service; Case No. 98-474, Application of Kentucky Utilities Company for Approval of an Alternative Method of Regulation of Its Rates and Service; Case No. 2000-459, The Joint Application of the Louisville Gas and Electric Company and Kentucky Utilities Company for the Review, Modification and Continuation of DSM Programs and Cost Recovery Mechanisms; Case No. 2001-053, the Application of East Kentucky Power Cooperative, Inc. for a Certificate of Public Convenience and Necessity, and a Certificate of Environmental Compatibility, for the Construction of a 250 MW Coal-Fired Generating Unit (With a Circulating Fluid Bed Boiler) at the Hugh L. Spurlock Power Station and Related Transmission Facilities, Located in Mason County, Kentucky, to be Constructed Only in the Event that the Kentucky Pioneer Energy Power Purchase Agreement is Terminated; and in Administrative Case No. 387, A Review of the Adequacy of Kentucky's Generation Capacity and Transmission System. I was the lead participant and representative for KDOE in the following integrated resource planning cases: American Electric Power Company (dba AEP), Cases No. 99-437 and 2002-00377; Big Rivers Electric Corporation, Cases No. 99-429 and 2002-00428; East Kentucky Power Cooperative, Inc., Cases No. 2000-044 and 2003-00051; Louisville Gas and Electric Company and Kentucky Utilities Company, Cases No. 99-430 and 2002-00367; and the Union Light, Heat and Power Company, Case No. 99-449. I also prepared testimony for the Division to submit in Administrative Case No. 341, An Investigation into the Feasibility of Implementing Demand-Side Management Cost Recovery and Incentive Mechanisms.

J. Phyllis Fox, Ph.D, PE, DEE
Environmental Management

2530 Etna Street
Berkeley, CA 94704
510-843-1126
510-845-0983 (fax)
Fox@AeroAquaTerra.Com

Dr. Fox has over 30 years of experience in the field of environmental engineering, including air quality management, water quality and water supply investigations, hazardous waste investigations, environmental permitting, nuisance investigations, environmental impact reports, CEQA/NEPA documentation, risk assessments, and litigation support.

EDUCATION

Ph.D. Environmental/Civil Engineering, University of California, Berkeley, 1980.

M.S. Environmental/Civil Engineering, University of California, Berkeley, 1975.

B.S. Physics (with high honors), University of Florida, Gainesville, 1971.

Post-Graduate:

S-Plus Data Analysis, MathSoft, 6/94.

Air Pollutant Emission Calculations, UC Berkeley Extension, 6-7/94

Assessment, Control and Remediation of LNAPL Contaminated Sites, API and USEPA, 9/94

Pesticides in the TIE Process, SETAC, 6/96

Sulfate Minerals: Geochemistry, Crystallography, and Environmental Significance,
Mineralogical Society of America/Geochemical Society, 11/00.

Design of Gas Turbine Combined Cycle and Cogeneration Systems, Thermoflow, 12/00

Air-Cooled Steam Condensers and Dry- and Hybrid-Cooling Towers, Power-Gen, 12/01

Combustion Turbine Power Augmentation with Inlet Cooling and Wet Compression,
Power-Gen, 12/01

CEQA Update, UC Berkeley Extension, 3/02

The Health Effects of Chemicals, Drugs, and Pollutants, UC Berkeley Extension, 4-5/02

Noise Exposure Assessment: Sampling Strategy and Data Acquisition, AIHA PDC 205, 6/02

Noise Exposure Measurement Instruments and Techniques, PDC 302, 6/02

Noise Control Engineering, AIHA PDC 432, 6/02

Optimizing Generation and Air Emissions, Power-Gen, 12/02

Strategic Issues for the Power Generation Industry, Power-Gen, 12/02

REGISTRATION

Class I Registered Environmental Assessor, California (REA-00704)

Class II Registered Environmental Assessor, California (REA-20040)

Qualified Environmental Professional, Institute of Professional Environmental
Practice (QEP #02-010007)

Registered Professional Engineer: Arizona, California, Florida, Georgia, Washington

Diplomat Environmental Engineer, American Academy of Environmental Engineers,