

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

IN THE MATTER OF:

JUL 07 2005

APPLICATION OF KENTUCKY UTILITIES COMPANY)
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY FOR THE CONSTRUCTION OF)
TRANSMISSION FACILITIES IN FRANKLIN,)
WOODFORD AND ANDERSON COUNTIES, KENTUCKY)

PUBLIC SERVICE
COMMISSION

CASE NO. 2005-00154

CONCERNED CITIZENS AGAINST POWER LINE EXTENSION'S
RESPONSE TO DATA REQUESTS OF KENTUCKY UTILITIES COMPANY

Intervenor, Concerned Citizens Against Power Line Extension ("Citizens") respectfully submit the following Responses to Kentucky Utilities Company's ("KU") following data requests answered by the date specified in the Commission's Order of Procedure herein.

1. As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawing, surveys or other written recorded materials, whether external or internal, of every kind or description, in the possession of or accessible to Citizens, its witnesses or its counsel. And, as used herein, "you" refers to Citizens, each and every individual member of Citizens, and Citizens' agents, representatives, officers, employees, directors and counsel.

2. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

3. These requests shall be deemed continuing so as to require further and supplemental responses if Citizens receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

5. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

6. If Citizens has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for KU as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of Citizens, or any of their witnesses, state: the identify of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer KU to the record where the document is located.

Data Requests

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 project)? If so, produce copies of each such review, study or analysis, and any documents or reports relating thereto, and state the name and

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

RESPONSE: The Citizens Group has retained GDS Associates, Inc., 1850 Parkway Place, Suite 800, Marietta, Georgia 30067 to perform an analysis of the proposed transmission project. The results of the analysis of the proposed transmission project are not yet available, but will be provided as soon as it is received.

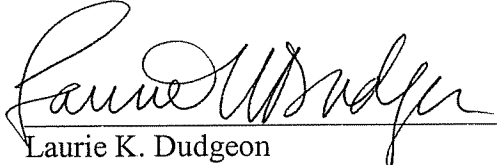
2. Have you retained any consultant or expert to testify in this proceeding? If so, state the name and address of such consultant or expert, produce a copy of his or her current curriculum vitae, and summarize his or her expected testimony.

RESPONSE: See Response to Data Request No. 1.

3. Produce copies of all documents, if any, you expect or intend to offer into evidence during the public hearing of this proceeding.

RESPONSE: In addition to the above, see the documents attached as Exhibit "A" to this Response. The Citizens Group agrees to supplement this response as documents are later identified.

Respectfully submitted,



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Robert C. Moore
HAZELRIGG & COX, LLP
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Frankfort, Kentucky 40602-0676
*Counsel for Concerned Citizens Against
Power Line Extension*

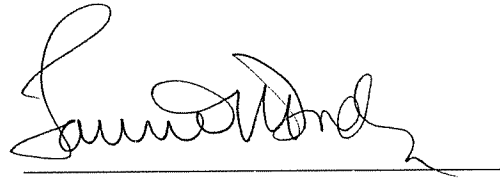
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response to Data Requests For Information was served upon the following parties by regular mail, postage prepaid, on this 11 day of July, 2005.

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

Robert M. Watt, III
Lindsey W. Ingram, III
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300 West Vine Street, Suite 2100
Lexington, Kentucky 40507

Elizabeth L. Cocanougher
Senior Corporate Attorney
LG&E Energy LLC
220 West Main Street
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A handwritten signature in black ink, appearing to read "Robert M. Watt, III", is written over a horizontal line.

RESOLUTION

Fiscal Court of Anderson County

Resolution in support of private property owners in Anderson County who are subject to potential adverse consequences resulting from Kentucky Utilities' proposed expansion project in the northern portion of Anderson County, Kentucky.

WHEREAS, the Anderson County Fiscal Court has been made aware of Kentucky Utilities intention to expand its electrical system from U.S. 60 in Franklin County, Kentucky through prime farmland in the northern portion of Anderson County, Kentucky, and;

WHEREAS, it is believed that the proposed expansion would involve one hundred and fifty (150) foot easements splitting prime farmland owned by Anderson County residents, and;

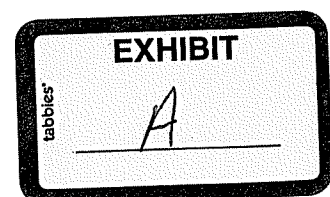
WHEREAS, Anderson County residents may suffer adverse effects from the proposed expansion project of Kentucky Utilities, and;

WHEREAS, the landowners in Anderson County are in disagreement with the proposed expansion plans of Kentucky Utilities;

NOW THEREFORE, Be it RESOLVED as follows:

That the Anderson County Fiscal Court supports the private landowners to be affected by Kentucky Utilities' proposed expansion project and urges Kentucky Utilities to seek an alternate route to expand its electrical service.

The vote taken on said Resolution on the 3rd day of May, 2005, the result being as follows:





RESOLUTION #19-2005

RESOLUTION IN SUPPORT OF PRIVATE PROPERTY OWNERS IN
FRANKLIN COUNTY WHO ARE SUBJECT TO POTENTIAL ADVERSE
CONSEQUENCES RESULTING FROM KENTUCKY UTILITIES'
PROPOSED EXPANSION PROJECT IN THE SOUTHWESTERN PORTION OF
FRANKLIN COUNTY, KENTUCKY

WHEREAS, the Franklin County Fiscal Court has been made aware of Kentucky Utilities intention to expand its electrical system from U.S. 60 in Franklin County, Kentucky through prime farmland in the southwestern portion of Franklin County, Kentucky; and

WHEREAS, it is believed that the proposed expansion would involve one hundred and fifty (150) foot easements splitting prime farmland owned by Franklin County residents; and

WHEREAS, Franklin County residents may suffer adverse effects from the proposed expansion project of Kentucky Utilities; and

WHEREAS, the landowners in Franklin County are in disagreement with the proposed expansion plans of Kentucky Utilities;

NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:

That the Franklin County Fiscal Court supports the private landowners to be affected by Kentucky Utilities' proposed expansion project and urges Kentucky Utilities to seek an alternate route to expand its electrical service.

Resolved on this 3 day of June, 2005.

Robert Moxley

Franklin County Judge/Executive

Attest:

Shirley Brown

Fiscal Court Clerk
