

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

THE PLAN OF KENTUCKY UTILITIES )  
COMPANY FOR THE VALUE DELIVERY ) CASE NO. 2005-00351  
SURCREDIT MECHANISM )

THE PLAN OF LOUISVILLE GAS AND )  
ELECTRIC COMPANY FOR THE VALUE ) CASE NO. 2005-00352 ✓  
DELIVERY SURCREDIT MECHANISM )

**Response of the Attorney General to the Request of  
Louisville Gas and Electric Company and Kentucky Utilities Company**

NOTICE OF FILING AND CERTIFICATION OF SERVICE

I hereby give notice that I have filed the original and ten true copies of the attached with the Executive Director of the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 this the 4th day of January, 2006, and certify that this same day I have served the parties by mailing a true copy, postage prepaid, to the following:

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**Response of the Attorney General to the Request of  
Louisville Gas and Electric Company and Kentucky Utilities Company  
Case Nos. 2005-00351 and 2005-00352**

Witness Responsible:  
ROBERT J. HENKES

Question 1: Please confirm that the prior regulatory experiences of Mr. Henkes, as set forth in Appendix I to his testimony, do not include any engagement with the Office of the Attorney General for Kentucky in the following cases:

- a) Annual Earnings Sharing Mechanism Filing of Louisville Gas & Electric Company, Case No. 2001-054 before the Kentucky Public Service Commission;
- b) Annual Earnings Sharing Mechanism Filing of Kentucky Utilities Company, Case No. 2001-055 before the Kentucky Public Service Commission;
- c) An Investigation Pursuant to KRS 278.260 of the Earnings Sharing Mechanism Tariff of Kentucky Utilities Company, Case No. 2003-00334 before the Kentucky Public Service Commission; and
- d) An Investigation Pursuant to KRS 278.260 of the Earnings Sharing Mechanism Tariff of Louisville Gas and Electric Company, Case No. 2003-00335 before the Kentucky Public Service Commission.

Response: Confirmed.



**Response of the Attorney General to the Request of  
Louisville Gas and Electric Company and Kentucky Utilities Company  
Case Nos. 2005-00351 and 2005-00352**

Witness Responsible:  
ROBERT J. HENKES

Question 2: Please identify any prior regulatory experiences of Mr. Henkes which concern, refer or relate to surcharge or surcredit rate mechanisms.

Question 3: For any regulatory experience described in the response to the preceding question, please provide a complete and accurate copy of any testimony associated with that experience.

Response: In the Commonwealth of Kentucky, I assisted the AG in a Kentucky Utilities and Louisville Gas and Electric Environmental Surcharge Proceeding, Case No. 97-SC-1091-DG. I did not prepare testimony in that proceeding.

In the Commonwealth of Kentucky, I assisted the AG in Kentucky Utilities' and Louisville Gas and Electric's Deferred Debit proceeding associated with their Workforce Separation Program, Case No. 2001-169.

In the District of Columbia, I assisted the People's Counsel of the District of Columbia in a Bell Atlantic SPF Surcharge proceeding, Formal Case 926. I did not prepare testimony in that proceeding.

In the State of New Jersey, I assisted the New Jersey Ratepayer Advocate in two Elizabethtown Gas Company DSM adjustment clause proceedings, Docket Nos. GR99070510 and GR00070471. I did not prepare testimonies in those proceedings.

In the States of Delaware and New Jersey, I assisted the Delaware Public Service Commission and New Jersey Ratepayer Advocate, respectively, in approximately 42 electric and gas fuel adjustment clause proceedings and purchased water adjustment clause proceedings. To the extent that I prepared testimony in those proceedings, they are too numerous to copy and ship to the parties in this case. However, I will make these testimonies available for review at my office