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**VIA OVERNIGHT MAIL**

January 4, 2006

RECEIVED

JAN 5 2006

PUBLIC SERVICE  
COMMISSION

Beth A. O'Donnell, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

**Re: Case No. 2005-00351 and Case No. 2005-00352**

Dear Ms. O'Donnell:

Please find enclosed the original and twelve (12) copies of responses of Kentucky Industrial Utility Customers, Inc. to LG&E and KU's First Set of Data Requests to be filed in the above-referenced matter. Please note that we have only provided the Commission and the Companies with one copy of the attachments. Copies will be provided to other parties upon request.

By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place this document of file.

Very Truly Yours,



David F. Boehm, Esq.  
Michael L. Kurtz, Esq.  
**BOEHM, KURTZ & LOWRY**

MLKkew  
Attachment

cc: Certificate of Service  
A. W. Turner, Esq.

## CERTIFICATE OF SERVICE

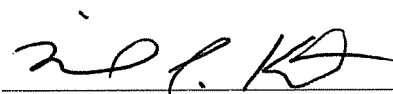
I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by overnight mail (unless otherwise noted) to all parties on the 4<sup>th</sup> day of January, 2005.

Honorable Elizabeth E. Blackford  
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Utility & Rate Intervention Division  
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David F. Boehm, Esq.  
Michael L. Kurtz, Esq.

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter Of: The Plan of Kentucky Utility Company for the Value : Case No. 2005-00351  
Delivery Surcredit Mechanism :

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**RESPONSES OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. TO  
FIRST SET OF DATA REQUESTS OF LG&E AND KU**

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1. **Please provide a complete copy of the following documents referenced in Exhibit \_(LK-1) to Mr. Kollen's testimony:**
  - (a) **November 1998 testimony in Case No. U-23327 before the Louisiana Public Service Commission;**
  - (b) **September 2004 testimony in Docket No. U-23327 Subdocket B before the Louisiana Public Service Commission;**
  - (c) **February 2005 testimony in Case No. 18638-U before the Georgia Public Service Commission;**
  - (d) **June 2005 testimony in Case No. 050045-EI before the Florida Public Service Commission; and**
  - (e) **September 2005 testimony in Case No. 20298-U before the Georgia Public Service Commission.**

**RESPONSE:** 1(a)-(e). Due to the volume of the response, a single copy of each of the requested testimonies has been provided only to the Companies. Copies will be provided to other parties only upon request to KIUC counsel.

2. Please identify any expert testimony appearances not shown on Exhibit \_ ( L K -1) which refer or relate to any type of surcharge or surcredit rate mechanisms.

**RESPONSE:** None

3. For any appearances identified in response to the preceding question, please provide a complete and accurate copy of any written testimony associated with such appearance.

**RESPONSE:** None

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter Of: The Plan of Kentucky Utility Company for the Value : Case No. 2005-00351  
Delivery Surcredit Mechanism :

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**RESPONSES OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. TO  
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PUBLIC SERVICE  
COMMISSION

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2. Please identify any expert testimony appearances not shown on Exhibit \_ ( L K -1) which refer or relate to any type of surcharge or surcredit rate mechanisms.

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**RESPONSE:** None