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December 20, 2005

RECEIVED  
DEC 21 2005  
PUBLIC SERVICE  
COMMISSION

Elizabeth O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

**RE: The Plan of Kentucky Utilities Company for the VDT Surcredit Mechanism**  
**KPSC Case No. 2005-00351**

**The Plan of Louisville Gas and Electric Company for the VDT Surcredit**  
**Mechanisms**  
**KPSC Case No. 2005-00352**

Dear Ms. O'Donnell:

Enclosed please find and accept for filing two originals and ten copies of Louisville Gas and Electric Company's and Kentucky Utilities Company's Data Requests to Kentucky Industrial Utility Customers, Inc. the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions or need any additional information, please contact me at your convenience.

Very truly yours,

Kendrick R. Riggs

KRR/ec  
Enclosures  
cc: Parties of Record (w/encl)

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

DEC 21 2005

PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

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

**In the Matter of:**

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

**DATA REQUESTS OF  
KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY  
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively the “Companies”) respectfully submit the following data requests to Kentucky Industrial Utility Customers, Inc. (“KIUC”) to be answered by the date specified in the Kentucky Public Service Commission’s (“Commission”) procedural schedule order herein.

**Instructions**

As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to KIUC, its witnesses or counsel.

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

B. These requests shall be deemed continuing so as to require further and supplemental responses if KIUC 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.

C. 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.

D. 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.

E. If KIUC 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 the Companies as soon as possible.

F. 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.

G. In the event any document requested has been destroyed or transferred beyond the control of KIUC or any of its witnesses, state: the identity 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.

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

### Data Requests

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

Dated: December 20, 2005

Respectfully submitted,



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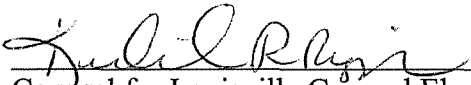
Counsel for Louisville Gas and Electric  
Company and Kentucky Utilities Company

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Data Requests were served on the following persons on the 20th day of December 2005, via U.S. mail, postage prepaid:

Elizabeth E. Blackford  
Assistant Attorney General  
Office of the Attorney General  
Office of Rate Intervention  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204

David F. Boehm  
Michael L. Kurtz  
Boehm Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202

  
\_\_\_\_\_  
Counsel for Louisville Gas and Electric  
Company and Kentucky Utilities Company