

Commonwealth of Kentucky  
Before the Public Service Commission

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PUBLIC SERVICE  
COMMISSION

In the Matter of:  
JOINT APPLICATION OF NUON GLOBAL, )  
SOLUTIONS USA, BV, NUON GLOBAL ) Case No. 2005-00433  
SOLUTIONS USA, INC., AIG HIGHSTAR CAPITAL )  
II, LP, HYDRO STAR, LLC, UTILITIES, INC. AND )  
WATER SERVICE CORPORATION OF KENTUCKY )  
FOR APPROVAL OF AN INDIRECT CHANGE IN )  
CONTROL OF A CERTAIN KENTUCKY UTILITY )  
PURSUANT TO THE PROVISIONS OF )  
KRS 278.020(5) AND (6) AND 807 KAR 5:001(8) )

ATTORNEY GENERAL'S REQUEST FOR INFORMATION  
TO THE JOINT APPLICANTS

The Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, submits this Request for Information to the Joint Applicants.

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

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

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis 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.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company 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 disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,

GREGORY D. STUMBO  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Counsel certifies filing of the original and ten photocopies of this Request for Information by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; furthermore, service of the filing was by mailing a true and correct of the same, first class postage prepaid, to Damon R. Talley, P. O. Box 150, Hodgenville, Kentucky 42748, all on this 5<sup>th</sup> day of December 2005.



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Assistant Attorney General

Attorney General's  
Request for Information

1. RE: Joint Application. The Attorney General requests that the Joint Applicants affirm all of their commitments made in Kentucky Public Service Commission Case No. 2005-00323. If not or a commitment is not affirmed, then identify each change and provide a discussion explaining the change for the commitment.
  
2. RE: Joint Application. Please provide an update to AG 1 – 22 from Case No. 2005-00323 (approvals by other authorities). Please continue to supplement the response to sub-part “e” of this request for the duration of Kentucky Public Service Commission Case No. 2005-00433.