



STOLL · KEENON · OGDEN  
P L L C

2000 PNC PLAZA  
500 WEST JEFFERSON STREET  
LOUISVILLE, KENTUCKY 40202-2828  
502-333-6000  
FAX: 502-333-6099  
WWW.SKOFIRM.COM

**KENDRICK R. RIGGS**  
DIRECT DIAL 502-560-4222  
DIRECT FAX 502-627-8722  
kendrick.riggs@skofirm.com

April 5, 2007

**VIA FEDERAL EXPRESS**

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

RECEIVED

APR 06 2007

PUBLIC SERVICE  
COMMISSION

RE: **An Examination of the Application of the Fuel Adjustment Clause of  
Kentucky Utilities Company From November 1, 2004 Through October 31,  
2006**  
KPSC Case No. 2006-00509 ✓

**An Examination of the Application of the Fuel Adjustment Clause of  
Louisville Gas and Electric Company From November 1, 2004 Through  
October 31, 2006**  
KPSC Case No. 2006-00510

Dear Ms. O'Donnell:

Enclosed please find and accept for filing two originals and ten copies of Kentucky Utilities Company's and Louisville Gas and Electric Company's First Set of Data Requests to Kentucky Industrial Utility Customers, Inc. in the above-referenced matters. 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

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

**In the Matter of:**

<b>AN EXAMINATION OF THE APPLICATION )</b>	
<b>OF THE FUEL ADJUSTMENT CLAUSE OF )</b>	
<b>KENTUCKY UTILITIES COMPANY FROM )</b>	<b>CASE NO. 2006-00509</b>
<b>NOVEMBER 1, 2004 THROUGH )</b>	
<b>OCTOBER 31, 2006 )</b>	

**In the Matter of:**

<b>AN EXAMINATION OF THE APPLICATION )</b>	
<b>OF THE FUEL ADJUSTMENT CLAUSE OF )</b>	
<b>LOUISVILLE GAS AND ELECTRIC )</b>	<b>CASE NO. 2006-00510</b>
<b>COMPANY FROM NOVEMBER 1, 2004 )</b>	
<b>THROUGH OCTOBER 31, 2006 )</b>	

**KENTUCKY UTILITIES COMPANY’S AND  
LOUISVILLE GAS AND ELECTRIC COMPANY’S  
FIRST SET OF DATA REQUESTS TO  
KENTUCKY INDUSTRIAL UTILITIES CUSTOMERS, INC.**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively the “Companies”) respectfully submit the following first set of data requests to the 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 the KIUC, its witnesses or counsel.

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

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

3. 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.

4. If the 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.

5. 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.

6. In the event any document requested has been destroyed or transferred beyond the control of the KIUC or any of his 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.

7. 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. In reference to Exhibit \_\_\_(SJB-1), Page 6 of 18, please provide a complete copy of the Testimony of Stephen J. Baron filed in May 1987 in Case No. 87-072-E-G1 before the West Virginia Utility Commission on behalf of West Virginia Energy Users' Group.

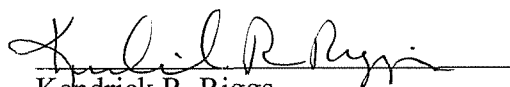
2. In reference to Exhibit \_\_\_(SJB-1), Page 6 of 18, please provide a complete copy of the Testimony of Stephen J. Baron filed in May 1987 in Case No. 86-524-E-SC before the West Virginia Utility Commission on behalf of West Virginia Energy Users' Group.

3. In reference to Exhibit \_\_\_(SJB-1), Page 8 of 18, please provide a complete copy of the Testimony of Stephen J. Baron filed in October 1989 in Case No. 2262 before the New Mexico Utility Commission on behalf of the New Mexico Industrial Energy Consumers.

4. In reference to Exhibit \_\_\_(SJB-1), Page 16 of 18, please provide a complete copy of the Testimony of Stephen J. Baron filed in March 2004 in Case No. 03A-436E before the Public Service Company of Colorado on behalf of CF&I Steel, LP and Climax Molybdenum.

Dated: April 5, 2007

Respectfully submitted,



Kendrick R. Riggs  
W. Duncan Crosby III  
Stoll Keenon Ogden PLLC  
2000 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202-2828  
Telephone: (502) 333-6000


Allyson K. Sturgeon  
Regulatory Counsel  
E.ON U.S. LLC  
220 West Main Street  
Post Office Box 32010  
Louisville, Kentucky 40202  
Counsel for Kentucky Utilities Company

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the above and foregoing First Set of Data Request was served, via United States mail, postage prepaid, and electronic mail to the following persons on the 5<sup>th</sup> day of April 2007:

Lawrence W. Cook  
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 Kentucky Utilities Company