

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY AND KENTUCKY UTILITIES)	CASE NO.
COMPANY FOR AN ORDER APPROVING A)	2007-00161
LARGE COMMERCIAL AND INDUSTRIAL REAL-)	
TIME PRICING TARIFF)	

SECOND DATA REQUEST OF COMMISSION STAFF TO
LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") (collectively "the Companies") are requested, pursuant to 807 KAR 5:001, to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on June 28, 2007. Each copy of the data requested should be placed in a bound volume with each item tabbed. Responses to requests for information shall be appropriately indexed, for example, Item 1(a), Sheet 2 of 6, and shall include the name of the witness responsible for responding to the questions related to the information provided. Careful attention shall be given to copied material to ensure its legibility.

Each response shall be under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Companies shall make timely amendment to any prior response if they obtain information upon the basis of which they know that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Companies fail to furnish all or part of the requested information, the Companies shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Refer to the response to Item 2 of the Commission Staff's First Request for Information dated May 21, 2007 regarding bill neutrality and the fact that such neutrality protects participating customers "by ensuring that their energy charges will not differ from the standard tariff rates if they do not deviate from their historical load patterns." If participation is voluntary and the intent is to modify behavior, why do LG&E and KU believe that bill neutrality is necessary to protect the customers?

2. Since the Customer Baseline Load ("CBL") is one complete calendar year of hourly firm load data developed from metered interval data for a customer's specific location, why is it necessary to adjust the CBL monthly?

3. Other companies have indicated it will take from 4 to 6 months to complete the tasks necessary to implement their Real-Time Pricing Pilot. Do LG&E and KU believe that they cannot reduce their proposed 8-month time frame by any amount? Explain the response.

4. With reference to the response to Item 8(c) of the Attorney General's First Request for Information dated May 21, 2007 and the statement that "the Companies are

requesting recovery of any program costs not recovered through the all Program Charge in subsequent base rates” and Paragraph 14 of the Application.

a. Does that mean that LG&E and KU are seeking the Commission’s authority to set up a deferred account to record these costs for future recovery? Explain your response.

b. How do the companies plan to isolate and track costs related to the pilot program?



Beth O'Donnell
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Public Service Commission
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DATED June 15, 2007

cc: All Parties