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PUBLIC SERVICE COMMISSION

Kentucky Utilities Company State Regulation and Rates

Louisville, Kentucky 40232

robert.conroy@eon-us.com

220 West Main Street

PO Box 32010

www.eon-us.com

Robert M. Conroy Manager - Rates T 502-627-3324 F 502-627-3213



Elizabeth O'Donnell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

CASE NO. 2007-00379

November 14, 2007

RE: AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF KENTUCKY UTILITIES COMPANY FOR THE SIX-MONTH BILLING PERIOD ENDING OCTOBER 31, 2006 AND FOR THE TWO-YEAR BILLING PERIOD ENDING APRIL 30, 2007

Dear Ms. O'Donnell:

Please find enclosed and accept for filing the original and seven (7) coies of the Response of Kentucky Utilities Company to the Second Data Request of Commission Staff dated October 31, 2007, in the above-referenced matter.

Should you have any questions concerning the enclosed, please contact me at your convenience.

Sincerely,

Robert M. Conroy

Enclosures

cc: Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE)	
COMMISSION OF THE ENVIRONMENTAL)	
SURCHARGE MECHANISM OF KENTUCKY)	CASE NO.
UTILITIES COMPANY FOR THE SIX-MONTH)	2007-00379
BILLING PERIOD ENDING OCTOBER 31, 2006)	
AND FOR THE TWO-YEAR BILLING PERIOD)	
ENDING APRIL 30, 2007)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
SECOND DATA REQUEST
OF COMMISSION STAFF
DATED OCTOBER 31, 2007

FILED: November 14, 2007

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS
COUNTY OF JEFFERSON)

The undersigned, **Valerie L. Scott**, being duly sworn, deposes and says that she is Controller for E.ON U.S. Services, Inc., that she has personal knowledge of the matters set forth in the responses (Question No. 3), and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Valerie L. SCOTT

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 3th day of November, 2007.

Victoria B. Harper (SEAL)
Notary Public

My Commission Expires:

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS
COUNTY OF JEFFERSON)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Manager of Rates for E.ON U.S. Services, Inc., that he has personal knowledge of the matters set forth in the responses (Question Nos. 1 and 2), and the answers contained therein are true and correct to the best of his information, knowledge and belief.

ROBERT M. CONROY

Subscribed and sworn to before me, a Notary Public in and before said County and State, this State, this State, and Dero, 2007.

Notary Public (SEAL)

My Commission Expires:

		,		
a				

KENTUCKY UTILITIES COMPANY

Response to Second Data Request of Commission Staff Dated October 31, 2007

Case No. 2007-00379

Question No. 1

Witness: Robert M. Conroy

- Q-1. Refer to the response to the September 19, 2007 Order, Appendix B ("First Request"), Item 1(b), page 2 of 4. Using both an adding machine and Excel spreadsheet, Staff cannot duplicate the results shown in columns 7 and 9 on this page. Verify the calculations and provide any clarifications.
- A-1. KU apologizes for the confusion. The calculations in the spreadsheet used three significant digits for the Rate of Return in Columns 4 and 5, and the Jurisdictional Allocation in Column 8, whereas the filed exhibit displayed two. Please see the modified attachment.

Page 1 of 1 Conroy Attachment to Response to Question No. 1

Kentucky Utilities Overall Rate of Return True-up Adjustment - Revised Rate of Return Impact on Calculated E(m) - Post 1994 Plan

Allocation, ES Jursidictional True Allocation, ES Jursidictional True 2
Rate Base as Revised True-up Adjustment (5)*(6)/12 \$ 243,003,837 168,483 261,398,788 181,236 270,306,146 187,412
· · · • •
Change in Rate of Return (4) - (3) 0.832% 0.832% 0.832% 0.832%
Rate of Return as Revised 11.832% 11.832% 11.832%
Rate of Return as Filed 11.000% 11.000% 11.000%
Expense Month Mar-06 Apr-06 May-06 Inn-06
Billing Month May-06 Jun-06 Jul-06 Ang-06

KENTUCKY UTILITIES COMPANY

Response to Second Data Request of Commission Staff Dated October 31, 2007

Case No. 2007-00379

Question No. 2

Witness: Robert M. Conroy

- Q-2. Refer to the response to the First Request, Item 3. KU has determined it experienced a cumulative net under-recovery of the environmental surcharge of \$1,699,755. Provide a breakdown of the cumulative amount showing the components which make up the net under-recovery. Include a calculation of each component or references in the record showing the calculation of each component.
- A-2. Please see the attachment.

Kentucky Utilities Company Breakdown of Over/(Under) Calculation

Cumulative Impact of Revised Rate of Return	\$ (1,218,077) a
Cumulative Impact of Change in Rate Base	56,742 b
Cash Working Capital Adj.	547 с
Revenue Over/(Under) Collection due to timing	 (538,967) d
Total Over/(Under) Collection	\$ (1,699,755)

a) Attachment to Response to Question 1(b) page 2 of 4, column 9 KPSC First Data Request Case No. 2007-00379

b) Attachment to Response to Question 1(b) page 1 of 4, column 9 KPSC First Data Request Case No. 2007-00379 Less impact of c) below		\$	57,289 (547)
Less impact of c) below		-\$	56,742
c) Attachment to Response to Question No. 8 KPSC First Data Request Case No. 2007-00379 Divided by 12 to calculate - Monthly Rate Base Attachment to Response to Question 1(b) page 2 of 4, column 4		\$ \$	23,691.25 1,974.27
Revised Rate of Return			11.377%
		\$	224.61
Jurisdictional Allocations			
December 2006	82.277%	\$	185
January 2007	78.849%	\$	177
February 2007	82.388%	\$	185
		\$	547

KENTUCKY UTILITIES COMPANY

Response to Second Data Request of Commission Staff Dated October 31, 2007

Case No. 2007-00379

Question No. 3

Witness: Valerie L. Scott

- Q-3. Refer to the response to the First Request, Item 12. Using a format similar to that shown in the response to Item 1(b), page 4 of 4, provide the calculations used to determine KU's jurisdictional capitalization as of February 28, 2007.
- A-3. Please see the attachment.

Kentucky Utilities Company Adjusted Electric Rate of Return on Common Equity 2/28/2007

	(1)	(2) Total Company	(3) Adjustments to Total Co Capitalization	(4) Adjusted Total Company Capitalization (2) · (3)	Capital Structure (4) / (4), row 7	(6) Jurisdictional Capitalization Allocation	(7) Kentucky Jurisdictional Capitalization (4) * (6)
1	Long-Term Debt	841.951,140	8,840,821	833,110,319	39.41%	88 20%	734,778,308
2	Med Term Notes Payable	-	-	-	0 00%	88 20%	-
3	Short-Term Debt	89,666,054	941,529	88,724,525	4 20%	88 20%	78,252,369
4	Preferred Stock	-	-	-	0 00%	88 20%	-
5	Accounts Receivable Financing	-		-	0 00%	88 20%	-
6	Common Equity	1,225,830,949	33,803,832	1,192,027,117	56.39%	88 20%	1,051,332,156
		2,157,448,143	43,586,182	2,113,861,961	100 00%		1,864,362,833
	(1)	(8) Kentucky Jurisdictional Capitalization (7)	(9) Adjustments to Ky Juris Capitalization	(10) Adjusted Ky Jurisdictional Capitalization (8) - (9)	Capital Structure (10) / (10) row 7	(12) Annual Cost Rate	(13) Weighted Cost of Capital (11) `(12)
1	Long-Term Debt	734,778,308	149,383,718	585,394,590	39.41%	4 69%	1 85%
2	Med Term Notes Payable	-	-	-	0 00%	0 00%	0 00%
3	Short-Term Debt	78,252,369	15,909,055	62,343,314	4 20%	5 26%	0 22%
4	Preferred Stock		-	*	0 00%	0.00%	0 00%
5	Accounts Receivable Financing			*	0.00%	0.00%	0 00%
6	Common Equity	1,051,332,156	213,740,530	837,591,626	56 39%	10 50%	5 92%
7		1,864,362,833	379,033,303	1,485,329,530	100 00%		7 99%

8 Weighted Cost of Capital Grossed up for Income Tax Effect (ROR + (ROR - DR) x [TR / (1 - TR)])

11 42%

Adjustments to Total Company Capitalization

	(1)	(14) Total Company Capitalization (2)	(15) Capital Structure (14) / (14), row 7	(16) Undistributed Subsidiary Earnings	(17) Investments in EEI (17) row 7 x (15)	(18) Other Investments (18) row 7 x (15)	(19) Minimum Pension Liability	(20) Total Adjustments to Capitalization (16) + (17) + (18)-(19)
1	Long-Term Debt	841.951,140	39 03%		8,674,518	166,303	-	8,840,821
2	Med Term Notes Payable	-	0 00%	-	-		-	•
3	Short-Term Debt	89,666,054	4 16%	-	923,818	17,711	-	941,529
4	Preferred Stock	-	0 00%	-	-	-	-	- 149
5	Accounts Receivable Financing	-	0.00%	-	-	-	-	-
6	Common Equity	1,225.830,949	56 82%	20,932,121	12,629,584	242,127	-	33,803,832
7		2,157,448,143	100.00%	20,932,121	22,227,920	426,141	-	43,586.182

Adjustments to Kentucky Jurisdictional Capitalization

	(1)	(21) Kentucky Jurisdictional Capitalization (8)	Capital Structure (21) / (21), row 7	(23) Environmental Surcharge 1994 Plan (23) row 7 x (22)	(24) Environmental Surcharge Post-1994 Plan (24) row 7 x (22)	(25) Adjustments to Ky Juris Capitalization (23) + (24)
1	Long-Term Debt	734,778,308	39 41%	•	149,383,718	149,383,718
2	Med Term Notes Payable	-	0 00%		-	
3	Short-Term Debt	78,252,369	4 20%	•	15,909,055	15,909,055
4	Preferred Stock		0 00%	-	-	
5	Accounts Receivable Financing	•	0 00%	-	-	-
6	Common Equity	1,051,332,156	56 39%		213,740,530	213,740,530
7	-	1,864,362,833	100 00%		379,033,303	379,033.303