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PUBLIC SERVICE COMMISSION

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

Kentucky Utilities Company
State Regulation and Rates

State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.eon-us.com

Robert M. Conroy Manager - Rates T 502-627-3324 F 502-627-3213 robert.conroy@eon-us.com

November 14, 2007

Frankfort, KY 40602

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 CASE NO. 2007-00379

Dear Ms. O'Donnell:

Enclosed please find an original and ten (10) copies of the Revised Response to question No. 1 (b) of Louisville Gas and Electric Company to Information Requested in the Commission's Order dated September 19, 2007, in the above-referenced proceeding.

In reviewing the responses to the data requests filed on October 17, 2007 in preparation of the second data request in this proceeding, KU determined that further clarity in the descriptive headings would allow the reader to more easily follow the calculations represented in the attached exhibits.

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



### 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                  | )            |

REVISED RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
INFROMATION REQUESED IN
APPENDIX B OF COMMISSION'S ORDER
DATED SEPTEMBER 19, 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 revised response to Question No. 1, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Value & Mall VALERIE L. SCOTT

Subscribed and sworn to before me, a Notary Public in and before said County and State, this  $\frac{34h}{4}$  day of  $\frac{November}{4}$ , 2007.

Willow B. Harper (SEAL) Notary Public

My Commission Expires:

#### KENTUCKY UTILITIES COMPANY

## November 14, 2007 Revised Response to Information Requested in Appendix B of Commission's Order Dated September 19, 2007

Case No. 2007-00379

#### **Question No. 1**

Witness: Valerie L. Scott

## For Each of the Six Periods Under Review

- Q-1. Concerning the rate of return on the original environmental compliance plan ("1994 Plan") and the four amendments to the environmental compliance plan ("Post-1994 Plans"), provide the following information for each of the billing periods under review:
  - a. For the 1994 Plan, calculate any true-up adjustment needed to recognize changes in the weighted average cost of KU's pollution control debt during the applicable months of each review period. Include all assumptions and other supporting documentation used to make this calculation. Any true-up adjustment is to be included in the determination of the over- or underrecovery of the surcharge for the corresponding billing period under review.
  - b. For the Post-1994 Plans, calculate any true-up adjustment needed to recognize changes in KU's cost of debt, preferred stock, accounts receivable financing (if applicable), or changes in KU's jurisdictional capital structure. Include all assumptions and other supporting documentation used to make this calculation. Any true-up adjustment is to be included in the determination of the over- or under-recovery of the surcharge for the corresponding billing period under review.

#### A-1. a.

b. See pages 3 of 4 and 4 of 4 of the attachment for corrections to formula headings for columns (7), (16), (18), (19), (23) and (24).

#### Kentucky Utilities Company Adjusted Electric Rate of Return on Common Equity 10/31/2006

|                  | (1)   | (2) Total Company   | (3) Adjustments to Total Co Capitalization (20)                      | (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  | 825,257,520   | 8,789,423  | 816,468,097  | 41 35%  | 88 00%  | 718.451.102  |
| 2                | Med Term Notes Payable  |   | ri .   | •  | 0 00%   | 88 00%  | -  |
| 3                | Short-Term Debt   | 29,400.054  | 313,126  | 29.086,928   | 1 47%   | 88.00%  | 25,595,042   |
| 4                | Preferred Slock   | -   |  | -  | 0 00%   | 88 00%  | -  |
| 5                | Accounts Receivable Financing   | -   | -  | -  | 0 00%   | 88 00%  | -  |
| 6                | Common Equity   | 1,141.425,036   | 12,357,361   | 1,129,067,675  | 57 18%  | 88 00%  | 993.523,100  |
|                  |   | 1,996,082,610   | 21,459,911   | 1.974,622,699  | 1   |   | 1,737,569,244  |
|                  |   |   |  |  |   |   |  |
|                  | (1)   | (8) Kentucky Jurisdictional Capitalization (7)  | (9) Adjustments to Ky Juris Capitalization (25)                      | (10) Adjusted Ky Jurisdictional Capitalization (8) - (9)                                       | (11)  Capital  Structure  (10) / (10), row 7                        | (12)<br>Annual<br>Cost<br>Rate                    | (13) Weighted Cost of Capital (11) * (12)                    |
| 1                | (1) Long-Term Debt  | Kentucky<br>Jurisdictional<br>Capitalization  | Adjustments<br>to Ky Juris<br>Capitalization                         | Adjusted Ky<br>Jurisdictional<br>Capitalization  | Capital<br>Structure  | Annual<br>Cost                                    | Weighted<br>Cost of<br>Capital                               |
| 1 2              | Long-Term Debt  | Kentucky Jurisdictional Capitalization (7)  | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)                 | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)                                   | Capital Structure (10) / (10), row 7                                | Annual<br>Cost<br>Rate                            | Weighted Cost of Capital (11) * (12)                         |
|                  | Long-Term Debt<br>Med Term Notes Payable  | Kentucky Jurisdictional Capitalization (7)  | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)                 | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)                                   | Capital<br>Structure<br>(10) / (10), row 7<br>41 35%                | Annual<br>Cost<br>Rate<br>4 84%                   | Weighted Cost of Capital (11) * (12) 2 00%                   |
| 2                | Long-Term Debt  Med Term Notes Payable  Short-Term Debt   | Kentucky<br>Jurisdictional<br>Capitalization<br>(7)<br>718,451,102                    | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)<br>123,859.617  | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)<br>594,591,484                    | Capital<br>Structure<br>(10) / (10), row 7<br>41 35%<br>0 00%       | Annual<br>Cost<br>Rate<br>4 84%<br>0 00%          | Weighted Cost of Capital (11) * (12) 2 00% 0 00%             |
| 2                | Long-Term Debt  Med Term Notes Payable  Short-Term Debt   | Kentucky<br>Jurisdictional<br>Capitalization<br>(7)<br>718,451,102                    | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)<br>123,859.617  | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)<br>594,591,484                    | Capital Structure (10) / (10), row 7 41 35% 0 00% 1 47%             | Annual<br>Cost<br>Rate<br>4 84%<br>0 00%<br>5 26% | Weighted Cost of Capital (11) * (12) 2 00% 0 00% 0 08%       |
| 2<br>3<br>4      | Long-Term Debt Med Term Notes Payable Short-Term Debt Preferred Stock Accounts Receivable Financing | Kentucky<br>Jurisdictional<br>Capitalization<br>(7)<br>718,451,102                    | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)<br>123,859.617  | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)<br>594,591,484                    | Capital Structure (10) / (10), row 7 41 35% 0 00% 1 47% 0 00%       | Annual Cost Rate  4 84% 0 00% 5 26% 0 00%         | Weighted Cost of Capital (11) * (12) 2 00% 0 00% 0 08%       |
| 2<br>3<br>4<br>5 | Long-Term Debt Med Term Notes Payable Short-Term Debt Preferred Stock Accounts Receivable Financing | Kentucky<br>Jurisdictional<br>Capitalization<br>(7)<br>718,451,102<br>-<br>25,595,042 | Adjustments to Kry Juris Capitalization (25) 123,859.617 - 4.412,536 | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)<br>594,591,484<br>-<br>21,182,506 | Capital Structure (10) / (10), row 7 41 35% 0 00% 1 47% 0 00% 0 00% | Annual Cost Rate  4 84% 0 00% 5 26% 0 00% 0 00%   | Weighted Cost of Capital (11)* (12)  2 00% 0 00% 0 00% 0 00% |

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

11 83%

#### Adjustments to Total Company Capitalization

|   | (1)                           | (14)<br>Total<br>Company<br>Capitalization<br>(2) | (15)  Capital Structure (14) / (14), row 7 | (16)<br>Undistributed<br>Subsidiary<br>Earnings | (17)<br>Investments<br>in<br>EEI<br>(17) row 7 x (15) | Other Investments (18) row 7 x (15) | (19)<br>Minimum<br>Pension<br>Liability | (20) Total Adjustments to Capitalization (16) + (17) + (18) - (19) |
|---|-------------------------------|---|--|---|---|-------------------------------------|---|--|
| 1 | Long-Term Debt                | 825,257,520                                       | 41 34%                                     | -   | 8,613,241   | 176,183                             | -                                       | 8.789.423  |
| 2 | Med Term Notes Payable        | -   | 0 00%                                      | •   | -   | -                                   | -                                       | •  |
| 3 | Short-Term Debt               | 29,400,054  | 1 47%                                      | -   | 306,850   | 6.277                               | •                                       | 313,126  |
| 4 | Preferred Stock               | -   | 0 00%                                      | -   | -   | •                                   | -                                       | -  |
| 5 | Accounts Receivable Financing | -   | 0 00%                                      | -   | -   | -                                   | -                                       |  |
| 6 | Common Equity                 | 1,141,425,036                                     | 57 18%                                     | 19,537,380                                      | 11.913,091  | 243,681                             | 19,336,791                              | 12,357,361   |
| 7 | -                             | 1,996,082,610                                     | 100 00%                                    | 19,537,380                                      | 20,833,180  | 426,140                             | 19,336,791                              | 21,459.911   |

#### Adjustments to Kentucky Jurisdictional Capitalization

|   | (1)                           | (21)<br>Kentucky<br>Jurisdictional<br>Capitalization<br>(8) | Capital Structure (21) / (21), row 7 | (23) Environmental Surcharge 1994 Plan (23) row 7 x (22) | (24)<br>Environmental<br>Surcharge<br>Post-1994 Plan<br>(24) row 7 x (22) | (25) Adjustments to Ky Juris Capitalization (23) + (24) |
|---|-------------------------------|---|--------------------------------------|--|---|---|
| 1 | Long-Term Debt                | 718.451,102   | 41 35%                               | -  | 123,859,617   | 123,859,617   |
| 2 | Med Term Notes Payable        | -   | 0 00%                                | ÷  | -   | -   |
| 3 | Short-Term Debt               | 25,595,042  | 1 47%                                | -  | 4,412,536   | 4.412,536   |
| 4 | Preferred Stock               | -   | 0 00%                                |  | •   |   |
| 5 | Accounts Receivable Financing | -   | 0 00%                                | *  | -   | -   |
| 6 | Common Equity                 | 993,523.100   | 57 18%                               | -  | 171,281,512   | 171,281,512   |
| 7 | -                             | 1,737,569,244   | 100 00%                              |  | 299,553,665   | 299,553.665   |

#### Kentucky Utilities Company Adjusted Electric Rate of Return on Common Equity 4/30/2007

|                  | (1)   | (2) Total Company   | (3) Adjustments to Total Co Capitalization (20)                     | (4)<br>Adjusted Total<br>Company<br>Capitalization<br>(2) - (3)                                | Capital Structure (4) / (4), row 7                                     | (6) Jurisdictional Capitalization Allocation      | (7) Kentucky Jurisdictional Capitalization (4) * (6)                |
|------------------|---|---|---|--|--|---|---|
| 1                | Long-Term Debt  | 916,951,140   | 8,416.218   | 908,534,922  | 41 43%   | 88 20%  | 801,300.545   |
| 2                | Med Term Notes Payable  | -   | -   | -  | 0 00%  | 88 20%  |   |
| 3                | Short-Term Debt   | 62.745,054  | 575,904   | 62,169,150   | 2 84%  | 88.20%  | 54.831,325  |
| 4                | Preferred Stock   | -   |   | -  | 0 00%  | 88 20%  | -   |
| 5                | Accounts Receivable Financing   | -   | •   | -  | 0 00%  | 88.20%  | -   |
| 6                | Common Equity   | 1,252.054.383   | 30,004,098  | 1.222.050,285  | 55 73%   | 88 20%  | 1,077,811.690   |
|                  | -   | 2,231,750,577   | 38,996,220  | 2,192,754,357  | 1  |   | 1,933,943,560   |
|                  |   |   |   |  |  |   |   |
|                  | (1)   | (8)<br>Kentucky<br>Jurisdictional<br>Capitalization<br>(7)                            | (9)<br>Adjustments<br>to Ky Juris<br>Capitalization<br>(25)         | (10)<br>Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)                           | (11)  Capital Structure (10) / (10), row 7                             | (12)<br>Annual<br>Cost<br>Rate                    | (13) Weighted Cost of Capital (11) * (12)                           |
| 1                | (1) Long-Term Debt  | Kentucky<br>Jurisdictional<br>Capitalization  | Adjustments<br>to Ky Juris<br>Capitalization                        | Adjusted Ky<br>Jurisdictional<br>Capitalization  | Capital<br>Structure   | Annual<br>Cost                                    | Weighted<br>Cost of<br>Capital                                      |
| 1 2              |   | Kentucky Jurisdictional Capitalization (7)  | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)                | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)                                   | Capital<br>Structure<br>(10) / (10), row 7                             | Annual<br>Cost<br>Rate                            | Weighted Cost of Capital (11) * (12)                                |
|                  | Long-Term Debt  | Kentucky Jurisdictional Capitalization (7)  | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)                | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)                                   | Capital<br>Structure<br>(10) / (10), row 7<br>41 43%                   | Annual<br>Cost<br>Rate<br>4 79%                   | Weighted Cost of Capital (11) * (12)                                |
| 2                | Long-Term Debt<br>Med Term Noles Payable  | Kentucky<br>Jurisdictional<br>Capitalization<br>(7)<br>801,300,545                    | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)<br>175,552,645 | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)<br>625,747,900                    | Capital<br>Structure<br>(10) / (10), row 7<br>41 43%<br>0 00%          | Annual<br>Cost<br>Rate<br>4.79%<br>0.00%          | Weighted Cost of Capital (11) * (12)  1 98% 0 00%                   |
| 2                | Long-Term Debt  Med Term Notes Payable  Short-Term Debt   | Kentucky<br>Jurisdictional<br>Capitalization<br>(7)<br>801,300,545                    | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)<br>175,552,645 | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)<br>625,747,900                    | Capital<br>Structure<br>(10) / (10), row 7<br>41 43%<br>0 00%<br>2 84% | Annual<br>Cost<br>Rate<br>4 79%<br>0 00%<br>5 26% | Weighted Cost of Capital (11) * (12) 1 98% 0 00% 0 15%              |
| 3                | Long-Term Debt Med Term Notes Payable Short-Term Debt Preferred Stock                               | Kentucky<br>Jurisdictional<br>Capitalization<br>(7)<br>801,300,545                    | Adjustments<br>to Ky Juris<br>Capitalization<br>(25)<br>175,552,645 | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)<br>625,747,900                    | Capital Structure (10) / (10), row 7 41 43% 0 00% 2 84% 0 00%          | Annual Cost Rate  4 79% 0 00% 5 26% 0 00%         | Weighted Cost of Capital (11) * (12) 1 98% 0 00% 0 15% 0 00%        |
| 2<br>3<br>4<br>5 | Long-Term Debt Med Term Notes Payable Short-Term Debt Preferred Stock Accounts Receivable Financing | Kentucky<br>Jurisdictional<br>Capitalization<br>(7)<br>801,300,545<br>-<br>54,831,325 | Adjustments to Ky Juris Capitalization (25) 175,552,645             | Adjusted Ky<br>Jurisdictional<br>Capitalization<br>(8) - (9)<br>625,747,900<br>-<br>42,818,616 | Capital Structure (10) / (10), row 7 41 43% 0 00% 2 84% 0 00% 0 00%    | Annual Cost Rate  4 79% 0 00% 5 26% 0 00% 0 00%   | Weighted Cost of Capital (11) * (12)  1 98% 0 00% 0 15% 0 00% 0 00% |

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

11 38%

#### Adjustments to Total Company Capitalization

|   | (1)                           | (14)<br>Total<br>Company<br>Capitalization<br>(2) | (15)  Capital  Structure  (14) / (14), row 7 | (16)<br>Undistributed<br>Subsidiary<br>Earnings | (17)<br>Investments<br>in<br>EEI<br>(17) row 7 x (15) | Other Investments (18) row 7 x (15) | (19)<br>Minimum<br>Pension<br>Liability | (20) Total Adjustments to Capitalization (16) + (17) + (18) - (19) |
|---|-------------------------------|---|--|---|---|-------------------------------------|---|--|
| 1 | Long-Term Debt                | 916,951.140                                       | 41 09%                                       |   | 8,138.415   | 277.803                             | -                                       | 8,416,218  |
| 2 | Med Term Notes Payable        | -   | 0 00%  | ·   | -   | •                                   | -                                       | -  |
| 3 | Short-Term Debt               | 62,745,054  | 2 81%  |   | 556,894   | 19.009                              | -                                       | 575,904  |
| 4 | Preferred Stock               | -   | 0 00%  | -   | -   |                                     | -                                       | -  |
| 5 | Accounts Receivable Financing | -   | 0.00%  |   | -   | •                                   | -                                       | -  |
| 6 | Common Equity                 | 1,252,054,383                                     | 56 10%                                       | 18,512,140                                      | 11,112,631  | 379,327                             | -                                       | 30,004,098   |
| 7 | -                             | 2,231,750,577                                     | 100 00%                                      | 18,512,140                                      | 19,807,940  | 676,140                             |   | 38,996,220   |

#### Adjustments to Kentucky Jurisdictional Capitalization

|   | (1)                           | (21) Kentucky Jurisdictional Capitalization (8) | (22)  Capital Structure (21) / (21), row 7 | (23)<br>Environmental<br>Surcharge<br>1994 Plan<br>(23) row 7 x (22) | (24)<br>Environmental<br>Surcharge<br>Post-1994 Plan<br>(24) row 7 x (22) | (25) Adjustments to Ky Juris Capitalization (23) + (24) |
|---|-------------------------------|---|--|--|---|---|
| 1 | Long-Term Debt                | 801,300,545                                     | 41 43%                                     |  | 175,552,645   | 175.552,645   |
| 2 | Med Term Notes Payable        | -   | 0 00%                                      | -  | -   | -   |
| 3 | Short-Term Debt               | 54,831.325                                      | 2 84%                                      |  | 12,012,710  | 12.012.710  |
| 4 | Preferred Stock               | -   | 0 00%                                      | -  | -   | -   |
| 5 | Accounts Receivable Financing | -   | 0 00%                                      | -  | -   | -   |
| 6 | Common Equity                 | 1,077,811.690                                   | 55 73%                                     | -  | 236.132,003   | 236,132,003   |
| 7 | -                             | 1.933,943,560                                   | 100 00%                                    | -  | 423,697,358   | 423.697.358   |