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COMMONWEALTH OF KENTUCKY

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BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

THE APPLICATIONS OF BIG RIVERS)	
ELECTRIC CORPORATION FOR:)	
(I) APPROVAL OF WHOLESALE TARIFF)	
ADDITIONS FOR BIG RIVERS ELECTRIC)	
CORPORATION, (II) APPROVAL OF)	Case No. 2007-00455
TRANSACTIONS, (III) APPROVAL TO)	
ISSUE EVIDENCES OF INDEBTEDNESS,)	
AND (IV) APPROVAL OF AMENDMENTS)	
TO CONTRACTS; AND OF E.ON U.S., LLC,)	
WESTERN KENTUCKY ENERGY CORP.)	
AND LG&E ENERGY MARKETING, INC.)	
FOR APPROVAL OF TRANSACTIONS)	

INITIAL DATA REQUEST OF HENDERSON MUNICIPAL

POWER & LIGHT

The City of Henderson Utility Commission, d/b/a Henderson Municipal Power & Light (HMPL), by counsel, pursuant to the Commission's order of January 22, 2008 submits the following initial requests for information to the Applicants.

- 1. Page 11, line 21 of Mr. Mudge's testimony refers to "anticipated plant availability". Does that include Station Two? If yes, explain how Station Two is included in determination of plant availability.
- 2. On page 29, line 10 of Mr. Blackburn's testimony, he refers to data provided by Big Rivers Electric Corporation (BR) on projected electricity sales, purchases and production. Was any information provided by BR related to Station Two? If yes, provide that information and explain how that information was used.

- 3. What is the estimated cost to address the repairs, replacements, upgrades or other deficiencies related to Station Two as so identified by BR?
 - a. Provide a list of the repairs, upgrades or replacements, the estimated costs and their priority.
- 4. Is BR, WKEC or E.ON aware of any other potential expenses related to the repair, replacement, upgrade of Station Two not identified in the financial model or other documents filed with the PSC? If yes, provide a list of the repairs, upgrades or replacements, the estimated cost and their priority.
- 5. Are there any remedial actions outstanding or incomplete related to any governmental or other inspection of Station Two performed within the last three years? Provide copies of any inspection reports and any remedial action taken as a result of the inspections.
- 6. Has BR pursuant to the Termination Agreement conducted a review of the operations of Station Two and its financial records and observed WKEC's operation, upkeep, maintenance and repair of the Station Two generators as summarized in Exhibit 11 section (k)(i)? If yes, provide any reports, analyses or other information resulting from these reviews.
- 7. Has BR determined that the capacity, operations, physical condition, state of repair and environmental condition of Station Two meet the standards of the Termination Agreement as summarized in Exhibit 11 section (m)?

a. Provide all documentation related to that determination.

Sphmitted by:

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Certificate of Service:

I certify that a copy of this pleading was served on the parties below by first class mail the 1st day of February, 2008.

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