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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

**APPLICATION OF KENTUCKY UTILITIES
COMPANY FOR AN ADJUSTMENT OF BASE
RATES**

CASE NO. 2008-00251

**FIRST SET OF
DATA REQUESTS
OF THE KROGER CO.**

The Kroger Co. requests the applicant, Kentucky Utilities Company, to respond to the First Set of Data Requests in accordance with the Order of Procedure entered herein.

DEFINITIONS

1. "Document(s)" is used in its customary broad sense and includes all written, typed, printed, electronic, computerized, recorded or graphic statements, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.

2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, on a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.

3. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.

4. "You" or "your" means the person whose filed testimony is the subject of these requests and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any request who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

5. "KU" - means Kentucky Utilities Company, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. The Requests shall be deemed continuing so as to require prompt further and supplemental production if at any time during this proceeding in the event you locate or obtain possession, custody or control of additional responsive documents.

2. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this proceeding should be provided as soon as they are completed. You are obliged to change, supplement and correct all answers to these Requests to conform to available information, including such information as it first becomes available to you after the answers hereto are served.

3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. The answers should identify the person(s) supplying the information.

5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

First Set of Data Requests of the Kroger Co.

- 1.1 Please provide an electronic copy of Mr. Seelye's KU cost-of-service model (Filing Requirement Tab 40) with all formulas intact. If the model cannot be provided to outside parties, please provide an electronic copy of the model output (preferably in MS Excel format).
- 1.2 Please provide an electronic copy with formulas intact, preferably in MS Excel format, of all KU electric rate design work papers.
- 1.3 Please explain how KU derived its proposed demand charges for the proposed TOD primary and secondary rates. Include any electronic workpapers with formulas intact, if necessary.
- 1.4 Please explain why KU has chosen to design its proposed TOD rates by price-differentiating only the demand charge with respect to peak and off-peak usage and not the energy charge?
- 1.5 Please explain why Seelye Exhibit 5 for KU does not include the proposed energy charge for TOD-Primary (p. 12) and TOD-Secondary (p. 13). Is this an inadvertent omission?
- 1.6 Please provide the KU Test Period kWh for TOD (primary and secondary) in the following categories:
 - a. Summer On-Peak
 - b. Winter On-Peak
 - c. Off-Peak
- 1.7 Please provide KU Test Period system average energy costs for the following categories:
 - a. Summer On-Peak
 - b. Winter On-Peak
 - c. Off-Peak
- 1.8 If the information requested in #1.7 above is not readily available and KU is not willing to make the calculations necessary to answer the question, please provide the data necessary to make the calculation.
- 1.9 Please provide KU Test Period system marginal energy costs for the following categories:
 - a. Summer On-Peak
 - b. Winter On-Peak
 - c. Off-Peak
- 1.10 If the information requested in #1.9 above is not readily available and KU is not willing to make the calculations necessary to answer the question, please provide the data necessary to make the calculation.
- 1.11 For any of Mr. Seelye's exhibits (other than the cost-of-service study or rate design workpapers previously requested) that include calculated values for KU's electric

business, please provide an electronic copy with all formulas intact (and any supporting workpapers with formulas intact) for KU's electric business only.

- 1.12 For any of Mr. Conway's exhibits that include calculated values for KU's electric business, please provide an electronic copy with all formulas intact (and any supporting workpapers with formulas intact) for KU's electric business only.

David C. Brown by MPO

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CERTIFICATE

I hereby certify that a copy of the foregoing was served by email on counsel for the Applicant and by mailing a true and correct copy, by regular U.S. mail to counsel for the Applicant and all parties on this the 27th day of August, 2008:

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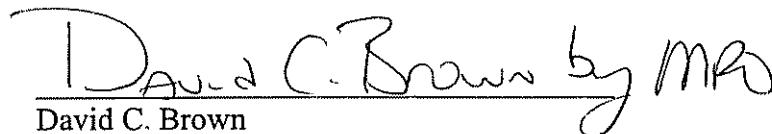
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