

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)
COMPANY, INC. FOR AN ADJUSTMENT) CASE NO. 2008-0025
OF BASE RATES)

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S SECOND DATA REQUEST FOR INFORMATION**

Comes now the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel and pursuant to the Public Service Commission's Scheduling Order of August 15, 2008 and submits its Second Requests for Information to Kentucky Utilities Company ("KU") to be answered in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

SUPPLEMENTAL REQUESTS FOR INFORMATION

1. Please refer to LFUCG Initial Request for Information No. 5. If LFUCG installs 700 additional street lights per year, which are primarily low wattage residential type fixtures, for up to a total of 3,500 additional street lights (taking into account the impact of roadway projections and housing market slow down) what would you estimate the approximate additional tariff LFUCG would pay on a monthly basis for these lights?

2. Please refer to LFUCG Initial Request for Information No. 6. KU is currently in the process of replacing all their Mercury Vapor (MV) fixtures in Fayette County. The last report reflected that there were approximately 2,857 Mercury Vapor (MV) street lights with an approximate average cost of \$1.50 more per light on a monthly basis than the High Pressure Sodium (HPS) street lights currently in use. Would KU be willing to expedite the replacement of these lights more rapidly than on an "as needed basis?" If so, please elaborate. If not, why not?

3. Is KU willing to offer any of its street light customers (including LFUCG) any lighting options that are more efficient in consuming electricity (i.e., LED or solar) than those presently offered?

a. Please provide the cost and feasibility of any alternative lighting options that might become available.

4. Is KU willing to offer any additional enhanced decorative lighting options, including those that might offer more efficiency?

a. Please provide the cost and feasibility of any alternative lighting options that might become available.

5. Please refer to LFUCG Initial Request for Information No. 4. Please provide the current total cost to KU of installing each type of public street light, as well as a break down of the cost of labor, materials, equipment, and any other associated costs for each type of street light. Also provide copies of the most recent contracts for purchase of each type of light fixture and pole type.

(a) What is the typical life expectancy of each street light fixture for which KU provided information in its response?

(b) Please provide the "installed values" (labor, associated materials, equipment, etc.) typically borne by KU for each type of street light.

6. Please refer to LFUCG Initial Request for Information No. 7. Is none of the information that KU provided in its response in the form of a written policy,

procedure, practice and/or guideline provided to KU's employees and/or agents? If so, please provide all such documentation (as previously requested). If not, please explain why not, and also explain how such policies, procedures, practices and/or guidelines can be expected to be consistently enforced and/or followed if they are not in written form.

(a) Please describe and explain in detail KU's "lighting patrols" (see Response to 7(a)) and provide all applicable information and supporting documentation. For example, how often and at what times and in what areas do these "patrols" take place?

(b) For each type of repair order generated by a person or entity described in KU's response to LFUCG 7(a)(i.e., employees and contractors, customers, LFUCG personnel, police, fire, etc.) please provide the annual number of such repair orders generated for each such person or entity. For example, what percentage of repairs are generated by the "lighting patrols" versus complaints? Please provide any and all supporting documentation.

(c) What percentage of public street light repairs are typically repairs to the same particular street light? Does KU maintain a regular schedule to replace antiquated public street lights? Please provide a detailed explanation as well as all supporting documentation.

(d) Please describe in detail the process for a citizen to make a complaint regarding a street light, and include any applicable points of contact, addresses and telephone numbers, and how the location of the light is to be described to KU (if not by street address). If this process or the required information differs for complaints made by the LFUCG or its divisions, please provide the additional information.

(e) Does KU in any way educate the public as to how or to whom to complain about a public street light that does not work properly? If so, please describe in detail all such efforts made by KU in the last 5 years and provide copies of any applicable materials.

(f) For each of the past 5 years, please provide the total number of public street lights that KU has performed maintenance work on in Fayette County. If this information is not available by county, please provide this information for KU's entire service area. If available, please also provide the type of maintenance work performed in each instance.

7. Please refer to KU's response to LFUCG Initial Request for Information No. 9(a). Please provide all documentation supporting KU's contention that "[a]t any

given time, on average, less than 1% of the total lights are reported as not in proper working order.”

(a) Is any particular type of public street light more likely to require repeat maintenance? If so, please identify all such types and how frequently such repeat maintenance is typically required.

8. Please refer to LFUCG Initial Request for Information No. 10. Please provide the information requested in general form, rather than for each specific type of street light.

(a) Please describe in detail each element of the proposed monthly rate for public street lights in general (maintenance and operations, etc.), including the percentage of the rate attributable to each element.

(b) Does this differ from the existing rate elements? If so, in what regard?

(c) What percentage of KU’s proposed monthly rate for public street lights is comprised of maintenance?

(d) What percentage of KU’s proposed monthly rate for public street lights is comprised of costs associated with acquiring or installing the street light?

9. Please refer to LFUCG Initial Request for Information No. 20. Is none of the information that KU provided in its response in the form of a written policy, procedure, practice and/or guideline provided to KU’s employees and/or agents? If so, please provide all such documentation (as previously requested). If not, please explain why not, and also explain how such policies, procedures, practices and/or guidelines can be expected to be consistently enforced and/or followed if they are not in written form.

10. Please refer to KU’s Response to LFUCG Initial Request for Information No. 23(a). Please described in detail how such costs or expenses are otherwise reflected in KU’s overall costs or expenses and in which categories this is the case. Will this proposed tariff not in some way result in KU receiving compensation more than once for performing the same service?

11. For each type of private street light designation for which the proposed tariff is less than the comparable type of public street light, please provide a detailed explanation for the justification for the difference in the charge.

12. Does KU agree that certain types of public street lights for which the LFUCG pays a monthly tariff are more efficient than others with respect to the street light's typical consumption or use of power or electricity? Please indicate all of the types of lights for which this is the case, and the difference in consumption or use power or electricity that is typically found with the use of the more efficient street light.

13. Has KU ever performed a cost of service or similar study in which the cost of public street lights was based upon the consumption or use of power or electricity by each type of respective street light? If so, please provide the results of any such study or studies and copies thereof.

14. With respect to any type of public street light for which the LFUCG pays a monthly tariff, was a volume discount rate applied as to the acquisition cost of the street light and/or any of its components (i.e., fixtures, poles, associated equipment, etc.)? If not, please provide the resulting amount in reduction in cost that such an application would have, as well as the overall reduction in cost to each proposed tariff that would be effected.

15. Does KU have any immediate or future plans that in any way effect its current level of resources (e.g. - manpower, number of employees, facilities, operations, etc.) committed to Fayette County, Kentucky? If so, please describe in detail any such plans and when they are proposed to take place.

16. Please provide a copy of KU's standard pole attachment tariff or agreement for a local government and any other such agreement KU utilizes for pole line attachments or tariff agreements.

Respectfully submitted,

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NOTICE AND CERTIFICATION

I hereby certify that an original and ten (10) copies of the Lexington-Fayette Urban County Government's Initial Requests for Information were filed with the Public Service Commission, attention: Stephanie Stumbo, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail delivery, postage prepaid, on the following, all on this the 22nd day of September, 2008.

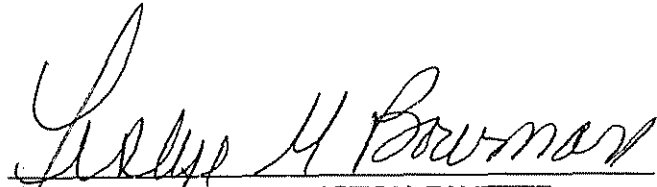
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