

Ms. Stephanie L. Stumbo Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601 RECEIVED

SEP 18 2008

PUBLIC SERVICE COMMISSION

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

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

RE: Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Base Rates – Case No. 2008-00252

Application of Louisville Gas and Electric Company to File Depreciation Study - Case No. 2007-00564

Dear Ms. Stumbo:

September 18, 2008

Please find enclosed and accept for filing the original and ten (10) copies of Amended Responses of Louisville Gas and Electric Company to the Attorney General's (AG) Initial Requests for Information dated August 27, 2008, in the above-referenced matters.

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

Sincerely,

Robert M. Conroy

cc: Parties of Record

Counsel of Record

Allyson K. Sturgeon, Senior Corporate Attorney – E.ON U.S. LLC
Kendrick R. Riggs – Stoll Keenon Ogden PLLC (Louisville Gas and Electric)
W. Duncan Crosby – Stoll Keenon Ogden PLLC (Louisville Gas and Electric)
Robert M. Watt – Stoll Keenon Ogden PLLC (Louisville Gas and Electric)
Dennis Howard II – Office of the Attorney General (AG)
Lawerence W. Cook – Office of the Attorney General (AG)
Paul D. Adams – Office of the Attorney General (AG)
Michael L. Kurtz – Boehm, Kurtz & Lowry (KIUC)
Lisa Kilkelly – Legal Aid Society, Inc. (ACM and POWER)
David C. Brown – Stites and Harbison (Kroger)
Joe F. Childers (CAK)

Consultants to the Parties

Steve Seelye – The Prime Group (E.ON U.S. LLC)
William A. Avera – FINCAP, Inc (E.ON U.S. LLC)
John Spanos – Gannett Fleming, Inc. (E.ON U.S. LLC)
Robert Henkes (AG)
Michael Majoros – Snavely King Majoros O'Connor & Lee (AG)
Glenn Watkins – Technical Associates (AG)
Dr. J. Randall Woolridge – Smeal College of Business (AG)
Lane Kollen – Kennedy and Associates (KIUC)
Kevin C. Higgins – Energy Strategies, LLC (Kroger)

VERIFICATION

STATE OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, William Steven Seelye, being duly sworn, deposes and says that he is the Senior Consultant and Principal, for The Prime Group, LLC, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

WILLIAM STEVEN SEELYE

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $18^{\frac{1}{10}}$ day of September, 2008.

Notary Public (SEAL)

My Commission Expires:

November 9, 2010

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2008-00252 CASE NO. 2007-00564

September 18, 2008 Amended Response to Initial Request for Information of the Attorney General Dated August 27, 2008

Question No. 36

Responding Witness: William Steven Seelye

- Q-36. With regard to Seelye Exhibit 23, page 1, for each of the exact same customer classes for which the 13-month average numbers are shown in column (1) [i.e., for Residential Rate RGS, Commercial Rate CGS, Industrial Rate IGS, Rate AAGS, Rate FT, Fort Knox, and so on] provide the equivalent actual month-end number of customers for the months of April 2005 through July 2008.
- A-36. LG&E does not have the data previously provided in the form requested in the data request. This data request calls for significant original work, which the requesting party can perform with the data previously provided in response to Question No. 210.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2008-00252 CASE NO. 2007-00564

September 18, 2008 Amended Response to Initial Request for Information of the Attorney General Dated August 27, 2008

Question No. 38

Responding Witness: William Steven Seelye

- Q-38. With regard to Seelye Exhibit 21, page 1, please provide the following information:
 - a For each of the exact same customer classes for which the 13-month average numbers are shown in column (1) [i.e., for Residential Rate R, Water Heating Rate WH, GS Rate LC, Large Commercial Rate LC Secondary, Large Commercial Rate Primary, and so on] provide the equivalent actual monthend number of customers for the months of April 2005 through July 2008
 - b. Explain why the year-end KWH adjustment in column (6) is multiplied times the current rates that consist not only of base rates, but also FAC rates.
- A-38. a. LG&E does not have the data previously provided in the form requested in the data request. This data request calls for significant original work, which the requesting party can perform with the data previously provided in response to Ouestion No. 168.
 - b. Consistent with the procedures for calculating electric year-end adjustments in prior rate case proceedings, fuel adjustment clause revenues were included in column 7 of page 1 of Seelye Exhibit 21 because the corresponding fuel expenses were included in total electric operating expenses on page 2 of Seelye Exhibit 21.