COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO. FOR AN ADJUSTMENT OF BASE RATES) 2009-00548

FIRST DATA REQUEST OF COMMISSION STAFF TO THE COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON, HARRISON AND NICHOLAS COUNTIES, INC.

The Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. ("CAC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than May 19, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

CAC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when

made, is now incorrect in any material respect. For any request to which CAC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. Refer to page 11 of the Direct Testimony of Jack E. Burch ("Burch Testimony"), line 21. Mr. Burch states KU's late payment charge as 10 percent. Explain whether Mr. Burch intended to state it as 5 percent.
- 2. Refer to pages 12 and 13 of the Burch Testimony where he discusses the change in the bill due date from 10 days to 12 days. Mr. Burch states that this change has resulted in customers having less time to pay their bills. Is it Mr. Burch's testimony that, under the former 10-day bill due date, only business days were counted and that, under the current 12-day bill due date, all calendar days are counted? If yes, is it Mr. Burch's testimony that this results in less time for customers to pay their bills? If no, explain why adding two extra days for customers to pay their bills results in less time.
- 3. Refer to page 13 of the Burch Testimony where he discusses the FLEX Option program. Mr. Burch states that, "simply allowing customers to choose their due date to accommodate a fixed income, while helpful, does not serve to extend the billing cycle in any way." Explain what is meant by "billing cycle" in this context, and given the FLEX Option, explain why the billing cycle needs to be extended.

Executive Director
Public Service Commission

P. O. Box 615

Frankfort, Kentucky 40602

DATED <u>MAY - 6</u> 2010

cc: Parties of Record

Lonnie E Bellar E.ON U.S. LLC 220 West Main Street Louisville, KY 40202 Honorable Matthew R Malone Attorney at Law Hurt, Crosbie & May PLLC The Equus Building 127 West Main Street Lexington, KY 40507 Honorable Robert M Watt, III Attorney At Law STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KY 40507-1801

Monica Braun STOLL KEENON OGDEN PLLC 300 West Vine Street Suite 2100 Lexington, KY 40507-1801 Carroll M Redford III Miller, Griffin & Marks, PSC 271 W Short Street, Suite 600 Lexington, KY 40507

Honorable David C Brown, Esq. Attorney at Law Stites & Harbison, PLLC 1800 Providian Center 400 West Market Street Louisville, KY 40202 Honorable Kendrick R Riggs Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KY 40202-2828

Honorable Frank F Chuppe Attorney Wyatt, Tarrant & Combs, LLP 500 West Jefferson Street Suite 2800 Louisville, KY 40202-2898 James T Selecky BAI Consulting 16690 Swingley Ridge Road, Suite 140 Chesterfield, MO 63017

Lawrence W Cook Assistant Attorney General Office of the Attorney General Utility & Rate 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204

Iris G Skidmore 415 W. Main Street, Suite 2 Frankfort, KY 40601

Honorable Gardner F Gillespie Attorney at Law Hogan & Hartson, L.L.P. 555 Thirteenth Street, N.W. Washington, DC 20004-1109 Holly Rachel Smith Hitt Business Center 3803 Rectortown Road Marshall, VA 20115

Honorable Michael L Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OH 45202 Honorable Allyson K Sturgeon Senior Corporate Attorney E.ON U.S. LLC 220 West Main Street Louisville, KY 40202