

Mr. Jeff DeRouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601



MAY 10 2010

PUBLIC SERVICE COMMISSION

Kentucky Utilities Company

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

Lonnie E. Bellar Vice President T 502-627-4830 F 502-217-2109 Ionnie.bellar@eon-us.com

May 10, 2010

RE: Application of Kentucky Utilities Company for an Adjustment of Its Base Rates – Case No. 2009-00548

Dear Mr. DeRouen:

Please find enclosed and accept for filing the original and ten (10) copies of the Response of Kentucky Utilities Company to the Fourth Data Request of the Commission Staff dated April 30, 2010, in the above-referenced matter.

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

Sincerely,

Lonnie E. Bellar

cc: Parties of Record

COMMONWEALTH OF KENTUCKY)) SS: **COUNTY OF JEFFERSON**

The undersigned, S. Bradford Rives, being duly sworn, deposes and says that he is Chief Financial Officer for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and 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.

BRIMS

S. Bradford Rives

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $\underline{\mathcal{T}}_{\text{day}}^{\text{H}}$ day of $\underline{\mathcal{M}}_{\alpha y}$ 2010.

Victoria B. Harper (SEAL) Notary Public

Sept 20,2010

COMMONWEALTH OF KENTUCKY)) SS: COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and 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.

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Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $\underline{6^{\pm h}}$ day of \underline{May} 2010.

Notary Public (SEAL)

November 9, 2010

COMMONWEALTH OF KENTUCKY)	
)	SS:
COUNTY OF JEFFERSON)	

The undersigned, Valerie L. Scott, being duly sworn, deposes and says that she is Controller for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Value L. Ross Valerie L. Scott

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $\underline{\gamma + h}$ day of \underline{May} 2009.

Victoria B. Harper (SEAL) Notary Public

Sept 20, 2010

COMMONWEALTH OF KENTUCKY)) SS: COUNTY OF JEFFERSON)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Director - Rates for E.ON U.S. Services, Inc., and 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.

Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $\underline{74}$ day of \underline{May} 2010.

Vectoria B. Harper (SEAL) Notary Public

Sept 20,2010

COMMONWEALTH OF KENTUCKY SS:)) **COUNTY OF JEFFERSON**

The undersigned, Sidney L. "Butch" Cockerill, being duly sworn, deposes and says that he is Director – Revenue Collections for E.ON U.S. Services, Inc., and 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.

Sidney D. "Butch" Cockerill

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 5^{4} day of May 2010. Kinden Much (SEAL)

October 16, 2012

COMMONWEALTH OF KENTUCKY) SS: **COUNTY OF JEFFERSON**)

The undersigned, **Ronald L. Miller**, being duly sworn, deposes and says that he is Director – Corporate Tax for E.ON U.S. Services, Inc., and 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.

Kusnzill

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $\underline{\gamma + \gamma}$ day of \underline{May} 2010.

Jutina B. Harped (SEAL) lotary Public

Sept 20,2010

COMMONWEALTH OF KENTUCKY) SS: **COUNTY OF JEFFERSON**)

The undersigned, **Shannon L. Charnas**, being duly sworn, deposes and says that she is Director – Utility Accounting and Reporting for E.ON U.S. Services, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Changs

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $\underline{\gamma}_{\mu}$ day of \underline{May}_{μ} 2010.

ia B. Harper (SEAL) Notary Public

Dept 20, 2010

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF KENTUCKY UTILITIES COMPANY TO THE FOURTH DATA REQUEST OF COMMISSION STAFF DATED APRIL 30, 2010

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FILED: May 10, 2010

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KENTUCKY UTILITIES COMPANY

CASE NO. 2009-00548

Response to Fourth Data Request of Commission Staff Dated April 30, 2010

Question No. 1

Responding Witness: Valerie L. Scott

- Q-1. Refer to the letter submitted by KU on April 19, 2010, regarding the revisions to Exhibit 1, Reference Schedule 1.16.
 - a. Explain why the amount of the 2009 Winter Storm Restoration regulatory asset decreased from \$3,464,137 to \$3,461,562.
 - b. Explain whether the differences in the adjustments for labor and labor-related costs in the letter of \$754,418 from the amounts of \$793,717 in Rives Exhibit 1, Reference Schedule 1.16, are or are not related to the change in the regulatory asset amount.
 - c. Provide an updated version of Exhibit 1, Reference Schedule 1.16, which shows the derivation of the amounts contained in the letter.
- A-1. a. The amount of total labor actually charged to the regulatory asset was \$3,461,562. The \$3,464,137 used in the originally submitted Rives Exhibit 1, Reference Schedule 1.16 was calculated from information compiled in preparing responses in the Commission's Case No. 2009-00174, *Application of Kentucky Utilities Company for an Order Approving the Establishment of a Regulatory Asset*. In preparing responses to requests for information in this case, KU referred to the actual journal entries used to record the 2009 Winter Storm Restoration regulatory asset and determined that subsequent adjustments had been made to the labor charged to the storm by various employees to reflect changes in actual costs.
 - b. The difference between the \$793,717 adjustment to wages on the originally submitted Rives Exhibit 1, Reference Schedule 1.16, and the \$763,317 adjustment to wages on the updated Rives Exhibit 1, Reference Schedule 1.16 included in the attachment to the response to Question No. 2, is related to adjusting the labor charged to the regulatory asset to the actual amount recorded, as discussed in the response to (a) above. The \$754,418 adjustment contained in the letter dated April 19, 2010, is the total labor adjustment after the related adjustments to payroll taxes, 401(k) costs, and the jurisdictional factor. See attached for a summary of the changes for each of these amounts.
 - c. See Rives Exhibit 1, Reference Schedule 1.16 included in the attachment to the response to Question No. 2.

KENTUCKY UTILITIES COMPANY

Summary of Revised Adjustment to Reflect Increases in Labor and Labor-Related Costs As Applied to the Twelve Months Ended October 31, 2009

		As	Adjusted	As Filed	1	Difference
1	Wages (Page 2)	\$	763,317	\$ 793,717	\$	(30,400)
2	Payroll Taxes (Page 3)		54,229	56,389		(2,160)
3	401(k) (Page 4)		28,243	29,368		(1,125)
4	Total		845,789	879,474		(33,685)
5	Kentucky Jurisdiction (Reference Schedule Allocators)		89.197%	89.197%		89.197%
6	Kentucky Jurisdictional Adjustment	\$	754,418	\$ 784,464	\$	(30,046)

KENTUCKY UTILITIES COMPANY

CASE NO. 2009-00548

Response to Fourth Data Request of Commission Staff Dated April 30, 2010

Question No. 2

Responding Witness: S. Bradford Rives, Lonnie E. Bellar, Valerie L. Scott, Shannon L. Charnas, Robert M. Conroy, Ronald L. Miller

- Q-2. In addition to the revisions presented in its April 19, 2010 letter, KU previously noted errors in the exhibits included in its application in various responses to data requests from Commission Staff and intervenors. Provide an updated version of all affected exhibits and schedules to the Rives Testimony reflecting the impact of the revisions noted in the letter and the revisions noted previously in KU's responses to data requests.
- A-2. The summary provided below identifies the revisions and updates previously identified in various responses to data requests. The overall rate increase impact of these revisions is a decrease of \$2,551,634 to KU's Overall Revenue Deficiency as shown on the attached Revised Exhibit 8.

Summary

The following revised exhibits are attached:

- Revised Exhibit 1, Adjustments to Operating Revenues, Operating Expenses and Net Operating Income: Corrected for revisions to Reference Schedules 1.03, 1.10, 1.13, 1.14, 1.16, 1.17, 1.21, 1.31, 1.34, 1.42, 1.45, and new Reference Schedule 1.48.
- Revised Exhibit 1, Reference Schedule 1.03, To Adjust Mismatch in Fuel Cost Recovery: Correction of over/under recovery calculation contained on Page 5 of 6 in the August 2009 expense month FAC filing. See response to KPSC 2-106.
- Revised Exhibit 1, Reference Schedule 1.10, To Eliminate DSM Revenue and Expenses: Correction to DSM expenses for related burden expenses not initially included. See response to KPSC 2-32.
- Revised Exhibit 1, Reference Schedule 1.13, To Adjust for Customer Billing Corrections and Rate Switching: Correction to bill corrections for customer account overbilling that occurred in the test period. See April 19, 2010 letter.

- Revised Exhibit 1, Reference Schedule 1.14, Adjustment to Revenues for Late Payment Charge: Update to late payment charges to reflect actual amounts. See response to KPSC 2-37.
- Revised Exhibit 1, Reference Schedule 1.16, Adjustment to Reflect Increases in Labor and Labor-Related Costs: Correction of labor costs related to 2009 Winter Storm regulatory asset to reflect the final amounts. See April 19, 2010 letter and response to Question No. 1.
- Revised Exhibit 1, Reference Schedule 1.17, To Adjust for Pension, Post-Retirement, and Post-Employment Costs: Update for 2010 Mercer Study and correction of expenses related to DSM burden amounts. See response to KPSC 2-40 and KPSC 3-16.
- Revised Exhibit 1, Reference Schedule 1.21, Adjustment to Reflect Normalized Storm Damage Expense: Correction of storm damage expenses in 2008 and 2009 as filed with the direct testimony of Valerie L. Scott, Scott Exhibit 1.
- Revised Exhibit 1, Reference Schedule 1.31, Adjustment to Reflect Amortization of Rate Case Expenses: Revised estimate of newspaper advertising expense. See response to KPSC 1-55.
- Revised Exhibit 1, Reference Schedule 1.34, Adjustment to Reflect Expiration of OMU Contract: Correction of OMU demand charges related to credit for SO2 allowances owed to KU by OMU. See April 19, 2010 letter.
- Revised Exhibit 1, Reference Schedule 1.42, Federal and State Income Taxes Corresponding to Annualization and Adjustment of Year-end Interest Expense: Corrected for revisions to Rives Exhibit 2.
- Revised Exhibit 1, Reference Schedule 1.45, Adjustment for Tax Basis Depreciation Reduction: Correction for error in book depreciation lives used to amortize the Advanced Coal Investment Tax Credit. See response to KPSC 2-47.
- Revised Exhibit 1, Reference Schedule 1.48, Adjustment to Remove Charges Incorrectly Booked Above the Line: New proposed adjustment to remove charges booked above the line that should have been below the line. See response to AG 1-110.
- Revised Exhibit 2, Capitalization at October 31, 2009: Correction of Trimble County joint use assets transfer to reflect the amount of investment tax credit transferred from LG&E. Update to Annual Cost Rate as of March 31, 2010. See April 19, 2010 letter.

- Revised Exhibit 4, Pro Forma Kentucky Jurisdictional Rate Base: Correction of Trimble County joint use assets transfer investment tax credit to correspond with the amount reflected on Exhibit 2.
- Revised Exhibit 7, Rates of Return Actual and Requested Pro-Formed for the Rate Increase: Revised to reflect revisions to Exhibit 1, Exhibit 4, and Exhibit 8.
- Revised Exhibit 8, Calculation of Overall Revenue Deficiency/(Sufficiency) at October 31, 2009: Revised to reflect revisions to Exhibit 1 and Exhibit 2.
- Revised Exhibit 9, Kentucky Jurisdictional Rate of Return on Common Equity: Revised to reflect revisions to Exhibit 1 and Exhibit 2.

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Attachment to Response to KU KPSC-4 Question No. 2 Page 1 of 25 Rives

For the Twelve Months Ended October 31, 2009	ded October 31, 20	00		
	Reference Schedule (1)	Operating Revenues (2)	Operating Expenses (3)	Net Operating Income (4)
1. Jurisdictional amount per books		1,221,660,614	1,030,540,469	\$ 191,120,145
2. Adjustments for known changes and to eliminate unrepresentative conditions:				
3. Adjustment to eliminate unbilled revenues	1.00	(3,744,529)		(3,744,529)
4. Adjustment to eliminate Merger Surcredit	1.01	2,800,345	,	2,800,345
5. Adjustment to eliminate Value Delivery Surcredit	1.02	42		42
6. REVISED-To adjust mismatch in fuel cost recovery	1.03	(49,766,556)	(42,881,804)	(6,884,752)
7. To adjust base rates and FAC to reflect a full year of the base rate change and FAC roll-in	1.04	(3,710,701)	,	(3,710,701)
8. Adjustment to eliminate Environmental Surcharge revenues and expenses	1.05	(92,924,384)	(30,936,828)	(61,987,556)
9. To adjust base rate revenues and expenses to reflect a full year of the ECR roll-m	1.06	87,584,103	22,359,078	65,225,025
10. Off system sales revenue adjustment for the ECR calculation	1.07	(3,722,927)		(3,722,927)
11. To eliminate net brokered and financial swap revenues and expenses	1.08	(256,817)	(6,096)	(250,721)
12. To eliminate ECR, MSR, FAC, and DSM accruals	1.09	283,654		283,654
13. REVISED-To eliminate DSM revenue and expenses	1.10	(12,940,085)	(7,721,275)	(5,218,810)
14. To reflect weather normalized electric sales margins	1.11	2,986,579	1,489,506	1,497,073
15. Adjustment to annualize year-end customers	1.12	9,724,872	5,885,824	3,839,048
16. REVISED-To adjust for customer billing corrections and rate switching	1.13	(268,961)	٠	(268,961)
17. REVISED-Adjustment to revenues for late payment charge	1.14	4,612,907		4,612,907

KENTUCKY UTILITIES

Adjustments to Operating Revenues, Operating Expenses and Net Operating Income For the Tweive Months Ended October 31, 2009

Revised Exhibit 1 Sponsoring Witness: Rives Page 1 of 4

Revised Exhibit 1 Sponsoring Witness: Rives Page 2 of 4

KENTUCKY UTILITIES

Adjustments to Operating Revenues, Operating Expenses and Net Operating Income For the Twelve Months Ended October 31, 2009

	Reference Schedule (1)	Operating Revenues (2)	Operating Expenses (3)	Net Operating Income (4)
18. Adjustment to reflect annualized depreciation expenses	1.15		19,212,820	(19,212,820)
19. REVISED-Adjustment to reflect increases in labor and labor related costs	1.16	ı	754,418	(754,418)
20. REVISED-Adjustment for pension, post retirement, and post employment costs	1.17	ı	(664,092)	664,092
21. Adjustment to reflect the increase in property insurance expense	1.18	·	373,107	(373,107)
22. Adjustment to reflect new pollution liability insurance expense	1.19	•	574,164	(574,164)
23. Adjustment for hazard tree program	1.20	ı	3,791,496	(3,791,496)
24. REVISED-Adjustment to reflect normalized storm damage expense	1.21	t	(1,076,306)	1,076,306
25. Adjustment for injuries and damages FERC account 925	1.22	·	200,710	(200,710)
 Adjustment to eliminate advertising expenses pursuant to Commission Rule 807 KAR 5:016 	1.23		(799,431)	799,431
27. Adjustment for expenses related to retired mainframe	1.24	·	(843,623)	843,623
28. Adjustment for MISO Exit Fee regulatory asset	1.25	ı	(83,909)	83,909
29. Adjustment for EKPC regulatory asset	1.26	ı	1,785,051	(1,785,051)
30. Adjustment for 2008 Wind storm regulatory asset	1.27	ı	2,454,286	(2,454,286)
31. Adjustment for 2009 Winter storm regulatory asset	1.28	ı	11,447,352	(11,447,352)
32. Adjustment for KCCS regulatory asset	1.29		360,504	(360,504)
33. Adjustment for CMRG regulatory asset	1.30		1,940	(1,940)
34. REVISED-Adjustment to reflect amortization of rate case expenses	1.31	,	807,520	(807,520)

Attachment to Response to KU KPSC-4 Question No. 2 Page 2 of 25 Rives

Revised Exhibit 1 Sponsoring Witness: Rives Page 3 of 4

KENTUCKY UTILITIES

Adjustments to Operating Revenues, Operating Expenses and Net Operating Income For the Twelve Months Ended October 31, 2009

	Reference Schedule (1)	Operating Revenues (2)	Operating Expenses (3)	Net Operating Income (4)
35. Adjustment for Southwest Power Pool settlement expenses	1.32		(896,454)	896,454
36. Adjustment to remove out of period adjustment for resettlements related to MISO RSG	1.33	,	(510,123)	510,123
37. REVISED-Adjustment to reflect expiration of OMU contract	1.34	·	(14,726,846)	14,726,846
38. Adjustment for reversal of OMU uncollectible account expense	1.35	ı	1,754,505	(1,754,505)
39 Adjustment to remove reserve margin demand purchases	1.36	,	(1,339,238)	1,339,238
40. Adjustment to expenses for 2003 Ice storm amortization	1.37	ı	(527,718)	527,718
41. To adjust property tax expense	1.38	·	1,199,643	(1,199,643)
42. These adjustments left intentionally blank	1.39 - 1.40			
43. NEW-Adjustment to remove charges incorrectly booked above-the-line	1.48	·	(490)	490
44. Total of above adjustments		(59,342,459)	(28,562,309)	(30,780,150)

Attachment to Response to KU KPSC-4 Question No. 2 Page 3 of 25 Rives

KENTUCKY UTILITIES	TILITIES		Sponsori	Revised Exhibit 1 Sponsoring Witness: Rives Page 4 of 4
Adjustments to Operating Revenues, Operating Expenses and Net Operating Income For the Twelve Months Ended October 31, 2009	ing Expenses and I ided October 31, 20	Vet Operating Income <u>009</u>		
	Reference Schedule (1)	Operating Revenues (2)	Operating Expenses (3)	Net Operating Income (4)
 Federal and state income taxes corresponding to base revenue and expense adjustments and above adjustments - 36.9264 % 	% 1.41		(11,365,995)	11,365,995
46. REVISED-Federal and state income taxes corresponding to annualization and adjustment of year-end interest expense	1.42		(527,961)	527,961
47. Prior income tax true-ups and adjustments	1.43		1,126,171	(1,126,171)
48. Adjustment for domestic production activities deduction	1.44		(457,757)	457,757
49. REVISED-Adjustment for tax basis depreciation reduction	1.45		1,007,924	(1,007,924)
50. This adjustment left intentionally blank	1.46			
51. Total adjustments		(59,342,459)	(38,779,927)	(20,562,532)
52. Adjusted Net Operating Income		1,162,318,155	991,760,542	\$ 170,557,613

Attachment to Response to KU KPSC-4 Question No. 2 Page 4 of 25 Rives

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					Capit	Capitalization at October 31, 2009	31, 2009					
					Revised Trimble with Annu	d Trimble County Joint Use Assets Transfer. with Annual Cost Rate as of March 31, 2010	Revised Trimble County Joint Use Assets Transfer (Col 3) with Annual Cost Rate as of March 31, 2010					
				C F	(- -				Adjustments	-		2
				I rimble County Joint Use Assets	I rimble County Joint Use Assets	Undistributed	Investment	Investments in	to Total Co.	Adjusted Total Company	Jurnsdictional Rate Base	Kentucky Jurisdictional
		Per Books	Capital	Transfer	Transfer	Subsidiary	in EEI	OVEC and Other	Capitalization	Capitalization	Percentage	Capitalization
		(1)	Structure (2)	(Net Plant) (3)	(IIC) (4)	Earnings (5)	(Col 1 x Col 6 Line 4) (6)	(Col 2 x Col 7 Line 4) (7)	(Sum of Col J - Col 7) (8)	(Gol 1 - Col 8) (9)	(Exhibit 3 Line 19) (10)	(Col 9 x Col 10) (11)
l. S	Short Term Debt	S 19,665,954	0.55%	S 266,095	\$ (16,104)	S	S (7,127)	\$ (4,621) \$	\$ 238,243	\$ 19,904,197	87.15%	S 17,346,508
2. L	Long Term Debt	1,631,779,405	45.52%	22,022,972	(1,332,807)	ı	(589,848)	(382,487)	19,717,830	1,651,497,235	87.15%	1,439,279,840
3.	Common Equity	1,933,128,508	\$3.93%	26,091,802	(1,579,048)	(6,207,858)	(698,825)	(453,153)	17,152,918	1,950,281,425	87,15%	1,699,670,262
4 L	Total Capitalization	S 3,584,573,867	100.00%	\$ 48,380,869	5 (2,927,959)	\$ (6,207,858)	\$ (1,295,800)	5 (840,261)	S 37,108,991	\$ 3,621,682,857		\$ 3,156,296,610
					Adjusted							
				Environmental	Kentucky		Annual	Cost				
		Kentucky		Compliance	Jurisdictional	Adjusted	Cost	of				
		Junsdictional	Capital	Plans (a)	Capitalization	Capital	Rate	Capital				

Cost	of	Capital	(Cal 16 x Cal 15) (17)	0.00%	2.13%	6.19%	8.32%	
Annual	Cost	Rate	March 31, 2010 (16)	0.21%	4.68%	11.50%		
	Adjusted	Capital	Structure (15)	0.55%	45.60%	53.85%	100.00%	
Kentucky	Jurisdictional	Capitalization	(Col 11 + Col 13) (14)	\$ 16,772,832	1,391,716,894	1,643,502,178	\$ 3,051,991,904	
	Compliance	Plans (a)	(Col 12 x Col 13 Line 4) (13)	0.55% \$ (573,676) \$ 16,772,832	(47,562,946)	(56,168,084)	<u>\$ (104,304,706)</u>	
		Capital	Structure (12)	0.55%	45.60%	53.85%	%00.001	
	Kentucky	Junsdictional	Capitalization (11)	\$ 17,346,508	1,439,279,840	1,699,670,262	\$ 3,156,296,610	
				Short Term Debt	Long Term Debt	Common Equity	Total Capitalization	
				÷	2	З.	4	

Environmental Compliance Plans:	Total Jurisdictional ECR Rate Base at 10/31/09	Less: Juns ECR Rate Base '01 and '03 Plans	Less: Juris ECR Rate Base Roll-In '05 and '06 Plans	Jurisdictional ECR Post '03 Rate Base
(a)				

\$ 1,120,801,977
149,293,659
867,203,612
\$ 104,304,706

NOTES: Column 15 used March 31, 2010 actual embedded cost rates.

Attachment to Response to KU KPSC-4 Question No. 2 Page 5 of 25 Rives

KENTUCKY UTILITIES

Revised Exhibit 2 Sponsoring Witness: Rives Page 1 of 1

Attachment to Response to KU KPSC-4 Question No. 2 Page 6 of 25 Rives

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Revised Exhibit 4 Sponsoring Witness: Rives Page 1 of 2

KENTUCKY UTILITIES

Pro Forma Kentucky Jurisdictional Rate Base <u>At October 31, 2009</u>

Title of Account (1)	Kentucky Jurisdictional Rate Base (a) (2)	Kentucky Jurisdictional Pro Forma Adjustments (b) (3)	Kentucky Jurisdictional Pro Forma Rate Base (4) (2 + 3)
1 Utility Plant at Original Cost	\$ 5,196,890,719	\$ (39,139,918)	\$ 5,157,750,801
2. Deduct:			
3 Reserve for Depreciation	1,824,368,838	53,850,252 (a)	1,878,219,090
4. Net Utility Plant	3,372,521,881		3,279,531,710
5. Deduct:			
6. Customer Advances for Construction	2,365,522		2,365,522
7 Accumulated Deferred Income Taxes	298,216,001	(9,997,697)	288,218,304
8 Asset Retirement Obligation-Net Assets	3,839,326		3,839,326
9 Asset Retirement Obligation-Regulatory Liabilities	3,543,696		3,543,696
10 Investment Tax Credit	\$ 84,059,458	(479,174)	83,580,284
11 Total Deductions	392,024,003		381,547,132
12 Add:			
13 Materials and Supplies	105,065,854	195,500	105,261,354
14. Prepayments	3,231,585		3,231,585
15 Emission Allowances	670,815	(1,045,828)	(375,013)
16. Cash Working Capital	80,258,812	(1,257,755)	79,001,057
17 Total Additions	189,227,066		187,118,983
18 Total Net Original Cost Rate Base	\$ 3,169,724,944		\$ 3,085,103,561

(a) Exhibit 3, Column 2

(b) Supporting Schedule-Exhibit 4, Column 5

Revised Supporting Schedule-Exhibit 4 Sponsoring Witness: Rives Page 2 of 2

KENTUCKY UTILITIES

Pro Forma Adjustments to Kentucky Jurisdictional Rate Base <u>At October 31, 2009</u>

	Title of Account (1)	Environmental ompliance Plans (2)	imble County nt Use Assets <i>Transfer</i> (3)	~ .	 Kentucky Jurisdictional Expense Adjustments (4)	Total Kentucky Jurisdictional Pro Forma Adjustments (5) (2 + 3 + 4)
I	Utility Plant at Original Cost	\$ (128,896,051)	\$ 89,756,133		\$ -	\$ (39,139,918)
2	Deduct:					
3	Reserve for Depreciation	(12,954,773)	47,592,205		19,212,820 (d)	53,850,252
4	Net Utility Plant	 (115,941,278)	 42,163,927	(b)	 (19,212,820)	 (92,990,171)
5	Deduct:					
6	Customer Advances for Construction	-	-		-	~
7	Accumulated Deferred Income Taxes	(9,997,697)	-			(9,997,697)
8	Asset Retirement Obligation-Net Assets	-	-			
9	Asset Retirement Obligation-Regulatory Liabilities	•	-		-	-
10	Investment Tax Credit	(3,030,890)	2,551,716	(c)	-	(479,174)
11.	Total Deductions	 (13,028,587)	 2,551,716	~ .	 	 (10,476,871)
12	Add:					
13	Materials and Supplies	195,500	-			195,500
14	Prepayments	-	*			-
15	Emission Allowances	(1,045,828)	-		-	(1,045,828)
16	Cash Working Capital	(541,687)	-		(716,068) (e)	(1,257,755)
17	Total Additions	 (1,392,015)	 -	. .	 (716,068)	 (2,108,083)
18	Total Net Original Cost Rate Base	\$ (104,304,706) (a)	\$ 39,612,211	 	\$ (19,928,888)	\$ (84,621,383)

(a) Adjustment to remove Environmental Compliance Plans (Exhibit 2 Col 13)

(b) Adjustment to reflect Trimble County joint use assets transfer (Exhibit 2 Col 3 x Exhibit 2 Col 10)

(c) Adjustment to reflect Trimble County joint use assets transfer Investment Tax Credit (Exhibit 2 Col 4 x Exhibit 2 Col 10)

(d) Adjustment to reflect annualized depreciation expenses (Reference Schedule 1 15)

(e) Using the 1/8th formula and change in Operation and Maintenance Expenses adjusted for FAC roll-in, Purchase Power and ECR expense adjustments ((Exhibit 1 Col 3, Line 44 - Line 8 - Line 9 - Line 18 - Line 39 - Line 41 - Ref Sch 1 04 Line 3) / 8)

Attachment to Response to KU KPSC-4 Question No. 2 Page 8 of 25 Rives

> Revised Exhibit 7 Sponsoring Witness: Rives Page 1 of 1

KENTUCKY UTILITIES

Rates of Return - Actual and Requested Pro-Formed for the Rate Increase For the Twelve Months Ended October 31, 2009

	 Total (1)
1. Kentucky Jurisdictional Net Original Cost Rate Base - Exhibit 3	\$ 3,169,724,944
2. Kentucky Jurisdictional Pro Forma Rate Base - Exhibit 4	\$ 3,085,103,561
3. Kentucky Jurisdictional Reproduction Cost Rate Base - Exhibit 5	\$ 5,768,178,028
4. Kentucky Jurisdictional Net Operating Income - Actual - Exhibit 1	\$ 191,120,145
 S. Rate of Return (Actual): On Kentucky Jurisdictional Net Original Cost Rate Base On Kentucky Jurisdictional Pro Forma Rate Base On Kentucky Jurisdictional Reproduction Cost Rate Base 	6.03% 6.19% 3.31%
 9. Kentucky Jurisdictional Adjusted Net Operating Income - Exhibit 1 10. Revenue Increase Applied for - Exhibit 8 11. Income Taxes - Exhibit 1, Reference Schedule 1.41 36.9264 % 	\$ 170,557,613 132,733,659 (49,013,733)
12. Adjusted Kentucky Jurisdictional Net Operating Income Pro-formed for Rate Increase	\$ 254,277,539
 Rate of Return (Pro-forma): On Kentucky Jurisdictional Net Original Cost Rate Base On Kentucky Jurisdictional Pro Forma Rate Base On Kentucky Jurisdictional Reproduction Cost Rate Base 	8.02% 8.24% 4.41%

Revised Exhibit 8 Sponsoring Witness: Rives Page 1 of 1

KENTUCKY UTILITIES

Calculation of Overall Revenue Deficiency/(Sufficiency) at October 31, 2009

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	ORIGINAL (1)	REVISED (2)	(3) (2) - (1)
J Adjusted Kentucky Jurisdictional Capitalization (Exhibit 2, Col 14)	\$ 3,054,543,620	\$ 3,051,991,904	\$ (2,551,716)
2 Total Cost of Capital (Exhibit 2, Col 17)	8.32%	8.32%	8.32%
3 Net Operating Income Found Reasonable (Line 1 x Line 2)	\$ 254,138,029	\$ 253,925,726	\$ (212,303)
4. Pro-forma Net Operating Income	169,167,271	170,557,613	1,390,342
 Net Operating Income Deficiency/(Sufficiency) Gross Up Revenue Factor - Exhibit 1, Reference Schedule 1.47 	\$ 84,970,758 0.62808570	\$ 83,368,113 0 62808570	\$ (1,602,645) 0 62808570
7. Overall Revenue Deficiency/(Sufficiency)	\$ 135,285,293	\$ 132,733,659	\$ (2,551,634)

Revised Exhibit 9 Sponsoring Witness: Rives Page 1 of 1

KENTUCKY UTILITIES

Kentucky Jurisdictional Rate of Return on Common Equity For the Twelve Months Ended October 31, 2009

	Adjusted Kentucky Jurisdictional Capitalization (Exhibit 2 Col 14) (1)	Percent of Total (2)	Annual Cost Rate (Exhibit 2 Col 16) (3)	Weighted Cost of Capital (Col 2 x Col 3) (4)
1. Short Term Debt	\$16,772,832	0.55%	0.21%	0.00%
2. Long Term Debt	\$1,391,716,894	45.60%	4.68%	2.13%
3. Common Equity	\$1,643,502,178	53.85%	6.43% (a)	3.46% (b)
4. Total Capitalization	\$3,051,991,904	100.00%	=	5.59%
5. Pro-forma Net Operating	g Income			\$170,557,613 (c)

6. Net Operating Income / Total Capitalization

5.59% (d)

Notes: (a) - Column 4, Line 3 / Column 2, Line 3

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(b) - Column 4, Line 4 - Line 1 - Line 2

(c) - Exhibit 1, Line 51, Column 4

(d) - Column 4, Line 5 divided by Column 1, Line 4

Revised Exhibit 1 Reference Schedule 1.03 Sponsoring Witness: Conroy

KENTUCKY UTILITIES

Revised To Adjust Mismatch in Fuel Cost Recovery For the Twelve Months Ended October 31, 2009

	Revenue	Expense
	Form A	Form A*
Expense	Page 5 of 6	Page 5 of 6
Month	Line 3	Line 8
Nov-08	7,161,750	3,457,004
Dec-08	2,617,813	6,620,436
Jan-09	4,080,402	5,529,020
Feb-09	6,594,389	8,560,589
Mar-09	4,237,573	5,358,776
Apr-09	8,186,876	2,729,326
May-09	4,611,651	(1,175,992)
Jun-09	3,221,469	5,255,165
Jul-09	(1,124,681)	1,869,873
Aug-09	5,348,954	3,518,904
Sep-09	1,735,424	872,983
Oct-09	3,094,936	285,720
Total	\$ 49,766,556	\$ 42,881,804
Adjustment	\$ (49,766,556)	\$ (42,881,804)

* NOTE : Expenses are recovered in the second succeeding month. For example, January 2009 would be reflected in March 2009. Attachment to Response to KU KPSC-4 Question No. 2 Page 12 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.10 Sponsoring Witness: Conroy

KENTUCKY UTILITIES

Revised To Eliminate DSM Revenues and Expenses For the Twelve Months Ended October 31, 2009

1. DSM Revenue adjustment	\$ (12,940,085)
2. DSM Expense adjustment	 (7,721,275)
3. Net Adjustment	\$ (5,218,810)

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Revised Exhibit 1 Reference Schedule 1.13 Sponsoring Witness: Conroy

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KENTUCKY UTILITIES

Revised To Adjust for Customer Billing Corrections and Rate Switching As Applied to the Twelve Months Ended October 31, 2009

1. Major Account Billing Corrections	(96,923)
2. Rate switch - LP to TOD	 (172,038)
3. Total Adjustment	\$ (268,961)

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Attachment to Response to KU KPSC-4 Question No. 2 Page 14 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.14 Sponsoring Witness: Bellar

KENTUCKY UTILITIES

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Revised Adjustment to Revenues for Late Payment Charge For the Twelve Months Ended October 31, 2009

4. Total Adjustment (Line 3 - Line 1)	\$ 4,612,907
3. Annual Amount of Late Payment Charges	\$ 9,011,237
2. Late Payment Charge Revenues (November 2009 to March 2010)	 4,612,907
1. Late Payment Charge Revenues in test year (April to October 2009)	\$ 4,398,330

Attachment to Response to KU KPSC-4 Question No. 2 Page 15 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.16 Sponsoring Witness: Scott Page 1 of 4

KENTUCKY UTILITIES

Revised Adjustment to Reflect Increases in Labor and Labor-Related Costs <u>As Applied to the Twelve Months Ended October 31, 2009</u>

1	Wages (Page 2)	\$ 763,317
2	Payroll Taxes (Page 3)	54,229
3	401(k) (Page 4)	28,243
4	Total	 845,789
5	Kentucky Jurisdiction (Ref. Sch. Allocators)	89.197%
6	Kentucky Jurisdictional Adjustment	\$ 754,418

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Revised Exhibit 1 Reference Schedule 1.16 Sponsoring Witness: Scott Page 2 of 4

KENTUCKY UTILITIES

Revised Adjustment to Reflect Increases in Labor and Labor-Related Costs <u>As Applied to the Twelve Months Ended October 31, 2009</u>

	Construction/
1 Labor for 12 months ended October 31, 2009:	Operating Other Total
2 Base	\$ 75,037,402 \$ 29,495,439 \$ 104,532,841
3 Overtime and Premium	12,184,059 3,003,390 15,187,449
4 Less: Labor Related to 2009 Winter Storm Restoration Regulatory Asset	(3,395,767) (65,795) (3,461,562)
5 TIA	7,432,930 2,652,131 10,085,061
6 Total Labor (Sum of Lines 2 - 5)	\$ 91,258,624 \$ 35,085,165 \$ 126,343,789
7 Total labor Excluding TIA (Line 6 - Line 5)	\$ 83,825,694 \$ 32,433,034 \$ 116,258,728
8 Total Operating and Construction/Other %	72 1% 27 9% 100 0%
9 Annualized base labor at October 31, 2009:	
10 Union	\$ 9,372,293
11 Exempt KU	11,396,218
12 Hourly	28,888,808
13 Non-Exempt	11,645,936
14 Exempt Servco (allocated to KU)	(48.3% of total) 38,746,168
15 Non-Exempt Servco (allocated to KU)	(48.3% of total) 5,308,412
16 Total Annualized Labor (Sum of Lines 10 - 15)	105,357,835
17 Union Overtime/Premiums (a)	3,596,063
18 Union Wage Increase Applied to Union Overtime Annualized for 2009 (1	1/08-7/18/09 OT labor x 3 5%) 89,960
19 Non-Exempt/Hourly/Servco Overtime/Premium (a)	11,591,386
20 Wage Increase Applied to Hourly Overtime/Premium Annualized for 200	
21 Wage Increase Applied to Non-Exempt/Servco Overtime/Premium Annua	
22 Less: Labor Related to 2009 Winter Storm Restoration Regulatory Asset	
23 Less: Wage Increase Applied to Labor Related to 2009 Winter Storm Res	
24 Total Annualized Labor (Sum of Lines 16 - 23)	\$ 117,321,790
25 Operating Labor for 12 months ended October 31, 2009 (Line 7)	\$ 83,825,694
26 Operating Labor based on annualized labor	
\$ 117,321,790	x 72.1% 84,589,011
27 Labor Adjustment Total (Line 26 - Line 25)	\$ 763,317
(a) Represents actual numbers taken from the Company's financial records fo	

the 12 months ended October 31, 2009

(b) All labor related to the 2009 winter storm restoration regulatory asset is assumed to be overtime and premiums

Attachment to Response to KU KPSC-4 Question No. 2 Page 17 of 25 Rives

Revised Exhibit 1 Reference Schedule 1.16 Sponsoring Witness: Scott Page 3 of 4

KENTUCKY UTILITIES

Revised Adjustments to Reflect Increases in Payroll Taxes <u>As Applied to the Twelve Months Ended October 31, 2009</u>

1	Operating Labor increase (Page 2 Line 27)	\$ 763,317
2	Percentage of wages that do not exceed Social Security (OASDI) limit	 91.2%
3	Operating Labor increase subject to Social Security tax (Line 1 x Line 2)	\$ 696,145
4	Medicare Tax (Line 1 x 1 45%)	\$ 11,068
5	Social Security Tax (Line 3 x 6.2%)	 43,161
6	Payroll Tax adjustment (Line 4 + Line 5)	\$ 54,229

Attachment to Response to KU KPSC-4 Question No. 2 Page 18 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.16 Sponsoring Witness: Scott Page 4 of 4

KENTUCKY UTILITIES

Revised Adjustment to Reflect Increases in Company Contribution to 401(k) <u>As Applied to the Twelve Months Ended October 31, 2009</u>

1	Direct total payroll for 12 months ended 10/31/09 before deducting storm-related labor (Page 2 Line 6 - Page 2 Line 4)	\$ 129,8	805,351	
2	Total 401(k) Company Contribution for 12 months ended 10/31/09	 4,7	764,961	
3	401(k) Company Contribution as a percent of payroll (Line 2 / Line 1)		3.7%	
4	Operating Labor increase (Page 2 Line 27)	 7	763,317	
5	401(k) Company Contribution operating increase (Line 3 x Line 4)	\$	28,243	

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Revised Exhibit 1 Reference Schedule 1.17 Sponsoring Witness: Scott

KENTUCKY UTILITIES

Revised To Adjust for Pension, Post Retirement, and Post Employment <u>For the Twelve Months Ended October 31, 2009</u>

	Pension	Post Retirement	Post Employment	Total
1. Pension, Post Retirement and Post Employment expenses in test year	\$ 17,380,811	\$ 5,179,729	\$ 449,162	\$ 23,009,702
2 Pension, Post Retirement, and Post Employment expenses annualized for 2010 Mercer Study	17,047,234	4,956,879	261,066	22,265,179
3 Total adjustment (Line 2 - Line 1)	\$ (333,577)	\$ (222,850)	\$ (188,096)	\$ (744,523)
4. Kentucky Jurisdiction (Ref. Sch. Allocators)				89.197%
5. Kentucky Jurisdictional adjustment				\$ (664,092)

Revised Exhibit 1 Reference Schedule 1.21 Sponsoring Witness: Scott

KENTUCKY UTILITIES

Revised Adjustment to Reflect Normalized Storm Damage Expense For the Twelve Months Ended October 31, 2009

1. Storm damage provision based	
upon ten year average	\$ 3,102,356
2. Storm damage expenses incurred during	
the 12 months ended October 31, 2009	4,244,616
3. Adjustment	(1,142,260)
4. Kentucky Jurisdiction	94.226%
5. Kentucky Jurisdictional adjustment	\$ (1,076,306)

Year	Expense (a)	CPI-All Urban Consumers		Amount
2009	\$ 4,244,616 (b)	1.0000	\$	4,244,616
2008	6,951,799 (b)	0.9927	•	6,901,051
2007	2,035,000	1.0308		2,097,678
2006	4,114,000	1.0602		4,361,663
2005	2,538,000	1.0944		2,777,587
2004	4,120,000	1.1315		4,661,780
2003	1,434,000	1.1616		1,665,734
2002	1,460,495	1.1881		1,735,214
2001	1,102,683	1.2069		1,330,828
2000	1,005,000	1.2412		1,247,406
Total			\$	31,023,557
Ten Year Average			\$	3,102,356

(a) 2009 expense is for 12 months ended October 31, 2009.

All other years expenses are for calendar year.

(b) 2008 and 2009 expenses do not include 2008 Wind Storm and 2009 Winter Storm expenses that were recorded as regulatory assets.

Attachment to Response to KU KPSC-4 Question No. 2 Page 21 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.31 Sponsoring Witness: Charnas

KENTUCKY UTILITIES

Revised Adjustment for Rate Case Amortization For the Twelve Months Ended October 31, 2009

1. Total Estimated cost of 2009 Rate Case	\$ 1,962,000
2. Amortization period in years	 3
3. Annual amortization	654,000
4. 2009 Rate Case amortization included in test year	 .
5. Net Adjustment for 2009 Rate Case expenses	654,000
6. 2008 Rate Case Annual amortization	460,559
7. 2008 Rate Case Annual amortization included in test year	 (307,039)
8. Net Adjustment for 2008 Rate Case expenses	 153,520
9. Total Adjustment (Line 5 + Line 8)	\$ 807,520

Attachment to Response to KU KPSC-4 Question No. 2 Page 22 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.34 Sponsoring Witness: Bellar

KENTUCKY UTILITIES

Revised Adjustment for Expiration of OMU Contract For the Twelve Months Ended October 31, 2009

1.	OMU Demand charges incurred during the 12 months ended October 31, 2009	\$ 17,048,315
2.	Adjustment	\$ (17,048,315)
3.	Kentucky Jurisdiction (Ref. Sch. Allocators)	 86.383%
4.	Kentucky Jurisdictional adjustment	\$ (14,726,846)

Attachment to Response to KU KPSC-4 Question No. 2 Page 23 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.42 Sponsoring Witness: Miller

KENTUCKY UTILITIES

Revised Calculation of Current Tax Adjustment Resulting <u>From "Interest Synchronization"</u>

1. Adjusted Jurisdictional Capitalization - Exhibit 2	\$	3,051,991,904
2. Weighted Cost of Debt - Exhibit 2	-10- <u></u>	2.13%
3. "Interest Synchronization"	\$	65,007,428
4. Kentucky Jurisdictional Interest per books (excluding other interest)		63,577,661
5. "Interest Synchronization" adjustment (Line 4 - 3)	\$	(1,429,767)
6. Composite Federal and State tax rate		36.9264%
7. Current tax adjustment from "Interest Synchronization"	\$	(527,961)

Attachment to Response to KU KPSC-4 Question No. 2 Page 24 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.45 Sponsoring Witness: Miller

KENTUCKY UTILITIES

Revised Adjustment for Tax Basis Depreciation Reduction For the Twelve Months Ended October 31, 2009

1. Permanent difference due to loss of depreciable tax basis	\$ 1,030,565
2. Kentucky Jurisdiction (Ref. Sch. Allocators)	 97.803%
3. Kentucky Jurisdictional adjustment	\$ 1,007,924

Attachment to Response to KU KPSC-4 Question No. 2 Page 25 of 25 Rives

> Revised Exhibit 1 Reference Schedule 1.48 Sponsoring Witness: Charnas

KENTUCKY UTILITIES

Adjustment to Remove Charges Incorrectly Booked Above-the-Line For the Twelve Months Ended October 31, 2009

1. Charges incorrectly booked above-the-line	\$ 549
2. Kentucky Jurisdiction (Ref. Sch. Allocators)	 89.197%
3. Kentucky Jurisdictional amount	\$ 490
4. Kentucky Jurisdictional adjustment	\$ (490)

Response to Question No. 3 Page 1 of 3 Cockerill

KENTUCKY UTILITIES COMPANY

CASE NO. 2009-00548

Response to Fourth Data Request of Commission Staff Dated April 30, 2010

Question No. 3

Responding Witness: Butch Cockerill

- Q-3. Refer to page 2 of 2 of the attachment to the response to Item 1 of the Attorney General's supplemental request for information, which shows the increase in the number of customers assessed late-payment penalties which began in April 2009 after the Customer Care System ("CCS") became operational.
 - a. Provide, as of the most recent date for which such information is available, the number of customers enrolled in the FLEX program.
 - b. Provide the number of customers as of March 2009 whose bill due date was modified under Extendicare, Select Due Date, or a similar program.
 - c. For the test year, provide a schedule which shows what the impact would have been on KU's late-payment penalty revenues if the number of days before such penalties were assessed had been 21, rather than 15, days from the date of billing. Describe the other financial impacts, if any, of extending the number of days from 15 to 21 before late-payment penalties would be assessed.
 - d. Explain whether the new CCS can accommodate a bill due date that does not change from month to month.
- A-3. a. As of April 30, 2010, KU had 1,557 customers enrolled in the FLEX program.
 - b. Kentucky Utilities did not have a modified due date program prior to the FLEX program.
 - c. This request asks the Company to provide data that would result from a counterfactual scenario. Whether and how customers would respond to a late-payment charge ("LPC") assessment date of 21 days from the bill date and the associated actual LPC revenue impact on the revenue requirement of changing the LPC assessment date contained in the data request is not known or measurable with reasonable certainty. Subject to this caveat the data provided herein is purely descriptive of historical facts, not predictive of future events. The Company does not believe it is reasonable to assume that the historical payment patterns contained in the data attached hereto would continue if the LPC assessment date were extended;

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rather, it would be rational economic behavior for a customer to pay on the last day on which no penalties would be assessed. Moreover, there likely are many reasons why customers do not pay their bills on time, which reasons might not be affected by a 21-day LPC assessment date.

Subject to these caveats, please see the attachment, which shows the number of customers assessed an LPC each month from April 2009 through October 2009. (The test year data for the period before CCS was implemented is not available through our CIS archive database.) The exhibit also shows the total amount of LPCs collected from those customers, as well as the amount of LPCs collected from those customers, as well as the amount of LPCs collected from those customers from and including day 16 through 21 following the bill date. Again, this is purely historical data, and likely does not reflect the actual LPC revenue impact of changing the LPC assessment date.

In addition to the LPC revenue impact, the Company anticipates changing the LPC assessment date would have other financial impacts and pose other operational challenges. For example, the need for short-term financing would likely increase as a result of customers' taking advantage of additional time to pay. On the operational side, assuming the Company would continue to issue disconnect notices on the 16th day after the bill date, if the LPC assessment date were extended to 21 days, the customer would have a disconnect notice issued prior to the LPC assessment.

Another operational change would need to occur in the Company's Installment Plan process. Currently, customers need their disconnect notice to establish an installment plan. If the LPC assessment date were extended, it would be possible for an installment plan to be established for an amount less than the total amount required to avoid disconnection of service. In short, extending the LPC assessment date would likely create confusion and dissatisfaction for the Company's customers and require additional employee training.

d. It should be noted that even prior to implementation of CCS, KU's customers did not have a fixed due date each month. The attachment is an example of the 2008 meter reading and billing dates for customers in three of our twenty billing portions. As the attachment shows, customers' monthly meter reading dates and bill due dates were not fixed during 2008 (prior to CCS implementation).

Though the new CCS can accommodate a bill due date that does not change from month to month, offering such a bill due date is not recommended. Having customers' bill due dates be the same each month would create significant operational issues and increase operational expenses.

The current variance in customer bill due dates is a result of the Company's meter reading process, which allows a "window" of time for meters to be read. Presently, company processes allow five days for a meter to be read before the customer's bill is generated. The purpose of the window is to read the maximum number of meters in

Response to Question No. 3 Page 3 of 3 Cockerill

the most cost-effective way and to minimize the number of estimated readings. Our current staffing levels are designed to optimize cost by maximizing the number of meters read per day. Though every effort is made to maximize the efficiencies of reading meters, various issues create the need for a meter-reading window. One key issue is the customer demographics. Even in large metropolitan areas, the number of customers in a specific geographic area may vary greatly. Our meter-reading software analyzes all these issues and creates meter-reading routes that attempt to maximize the number of meters read each day while minimizing driving time and avoiding revisiting streets and neighborhoods multiple times in the same month. In addition to customer demographic issues, a meter-reading window is necessary to offset the effects of inclement weather, holidays, unexpected employee illnesses, and injuries. If a decision were made to establish a customer due date that did not change from month to month, the company would need to greatly increase the number of meter readers it currently employs or increase the number of customer bills calculated based upon estimated consumption. In addition, if a bill were held due to a billing exception that could be resolved within one or two days to adhere to a specific due date, KU would be required to hold the bill until the next month, when the customer would likely receive two bills at the same time. Because of these operational and financial issues, using a meter-reading window is an established business practice within the utility industry.

Page 1 of 1 Cockerill Attachment to Response to KU KPSC-4 Question No. 3(c)

77,620 266,998 215,950 199,986 Between Days 16 and 21 215,227 161,391 Total LPC Received (4) 6 \$ θ \$ \$ 696,168 258,120 731,496 814,876 523,047 644,391 Total LPC Assessed 69 \$ Э Э Ω 129,670 133,556 138,435 44,399 119,179 116,707 Total # Customer Accounts Assessed LPC **Posting Month MAY 2009** AUG 2009 **APR 2009** JUN 2009 JUL 2009 **SEP 2009**

Kentucky Utilities Company

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1,405,638 ∽ 4,418,591

268,466

\$

750,494

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139,313

OCT 2009

Total

821,259 \$

Kentucky Utilities Company Sample Customer Bill Due Dates for the Year 2008 Customer Meter Read Portion 01, 10, 19

Portion	Scheduled Read	Date to Bill	Bill Due Date
01	3-Jan-08	04-Jan	16-Jan
01	1-Feb-08	04-Feb	14-Feb
01	3-Mar-08	04-Mar	14-Mar
01	2-Apr-08	03-Apr	15-Apr
01	1-May-08	02-May	14-May
01	2-Jun-08	03-Jun	13-Jun
01	1-Jul-08	02-Jul	15-Jul
01	1-Aug-08	04-Aug	14-Aug
01	2-Sep-08	03-Sep	15-Sep
01	1-Oct-08	02-Oct	14-Oct
01	30-Oct-08	31-Oct	12-Nov
01	1-Dec-08	02-Dec	12-Dec
10	16-Jan-08	17-Jan	29-Jan
10	14-Feb-08	15-Feb	27-Feb
10	14-Mar-08	17-Mar	28-Mar
10	15-Apr-08	16-Apr	28-Apr
10	14-May-08	15-May	28-May
10	13-Jun-08	16-Jun	26-Jun
10	16-Jul-08	17-Jul	29-Jul
10	14-Aug-08	15-Aug	27-Aug
10	15-Sep-08	16-Sep	26-Sep
10	14-Oct-08	15-Oct	27-Oct
10	12-Nov-08	13-Nov	25-Nov
10	12-Dec-08	15-Dec	29-Dec
19	29-Jan-08	30-Jan	11-Feb
19	27-Feb-08	28-Feb	11-Mar
19	28-Mar-08	31-Mar	10-Apr
19	28-Apr-08	29-Apr	09-May
19	28-May-08	29-May	10-Jun
19	26-Jun-08	27-Jun	10-Jul
19	29-Jul-08	30-Jul	11-Aug
19	27-Aug-08	28-Aug	10-Sep
19	26-Sep-08	29-Sep	09-Oct
19	27-Oct-08	28-Oct	07-Nov
19	25-Nov-08	26-Nov	10-Dec
19	29-Dec-08	30-Dec	12-Jan

Note: Due to the historic five day meter read window, the timeframe to read the customer's meter was two business days before and after the scheduled read date. The due dates shown above were for those bills issued on the corresponding Date to Bill above. If a meter was read during the two business days after the scheduled read date, the date to mail and due date was appropriately adjusted.

KENTUCKY UTILITIES COMPANY

CASE NO. 2009-00548

Response to Fourth Data Request of Commission Staff Dated April 30, 2010

Question No. 4

Responding Witness: Butch Cockerill

- Q-4. Refer to the response to Item 6 of the Association of Community Ministries' Second Request in Case No. 2009-00549 in which KU's sister company, Louisville Gas and Electric Company, states "[the] Company believes there is no need to change the deposit installment options currently available to customers required to make a deposit as a condition of reconnection." State whether KU likewise believes there is no need to change the deposit installment options currently available to its customers.
- A-4. KU will not seek to change the deposit installment options currently available to its customers.