RECEIVED

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

MAY 19 2010

PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS)	
AND ELECTRIC COMPANY FOR AN)	CASE NO. 2009-00549
ADILISTMENT OF BASE RATES)	

ATTORNEY GENERAL'S RESPONSES TO DISCOVERY REQUESTS OF LOUISVILLE GAS & ELECTRIC COMPANY

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and states as follows for his responses to the discovery requests of Louisville Gas & Electric Company.

Respectfully submitted,

JACK CONWAY ATTORMEY GENERA

DENNIS G. HOWARD, II LAWRENCE W. COOK

PAUL D. ADAMS

ASSISTANT ATTORNEYS GENERAL

1024 CAPITAL CENTER DRIVE,

SUITE 200

FRANKFORT KY 40601-8204

(502) 696-5453

FAX: (502) 573-8315

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Lonnie E Bellar E.ON U.S. LLC 220 West Main Street Louisville, KY 40202

Honorable David C Brown, Esq. Stites & Harbison, PLLC 1800 Providian Center 400 West Market Street Louisville, KY 40202

Honorable Frank F Chuppe Wyatt, Tarrant & Combs, LLP 500 West Jefferson Street, Suite 2800 Louisville, KY 40202-2898

Steven A Edwards Office of the Staff Judge Advocate 1320 Third Avenue, Room 215 Fort Knox, KY 40121-5000

Robert A Ganton, Esq U.S. Army Legal Services Agency Regulatory Law Office 901 North Stuart Street, Suite 525 Arlington, VA 22203

Honorable Lisa Kilkelly Legal Aid Society 416 West Muhammad Ali Boulevard Suite 300 Louisville, KY 40202 Honorable Michael L Kurtz Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202

Honorable Kendrick R Riggs Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KY 40202-2828

Honorable Allyson K Sturgeon Senior Corporate Attorney E.ON U.S. LLC 220 West Main Street Louisville, KY 40202

Honorable Robert M Watt, III STOLL KEENON OGDEN PLLC 300 West Vine Street, Suite 2100 Lexington, KY 40507-1801

Honorable Gardner F Gillespie Hogan & Hartson, L.L.P. 555 Thirteenth Street, N.W. Washington, DC 20004-1109

Tom Fitzgerald, Director Kentucky Resources Council PO Box 1070 Frankfort KY 40602 Kentucky School Boards Association Matthew R. Malone William H, May, II Hurt, Crosbie & May PLLC The Equus Building 127 West Main Street Lexington, KY 40507 Laurence J Zielke Zielke Law Firm PLLC 1250 Meidinger Tower 462 South Fourth Avenue Louisville, KY 40202-3465

this day of

Assistant Attorney General

2010

WITNESS RESPONSIBLE:

Counsel

Page 1 of 1

Q 1. To the extent not previously provided, please provide electronic copies (on CD) of all tables, charts, diagrams, schedules, and exhibits (collectively, "Exhibits") contained in the testimony of all witnesses for the AG. Please include all workpapers, schedules, underlying computations and supporting documentation used and relied upon by each witness in the preparation of his or her testimony, including the preparation of all Exhibits. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.

Response:

Please see the attached CD.

WITNESS RESPONSIBLE:

Counsel

Page 1 of 1

Q 2. To the extent not previously provided, please provide copies of all schedules and underlying computations and workpapers developed in the analysis by the AG and/or its witness(es) of the Companies' requested rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the analyses of the revenue requirement components and computations, including all ratemaking adjustments to the historic data, and the cost of service model.

Response:

Please see the attached CD.

WITNESS RESPONSIBLE: Michael Majoros Page 1 of 1

Q 3. Is Mr. Majoros aware of any generally accepted accounting principle, public utility commission order, or court opinion approving the netting of storm-related and/or research-group-contribution regulatory assets with cost-of-removal regulatory liabilities, such as Mr. Majoros has proposed in this proceeding? If so, please specifically describe each and every such authority and provide a complete and accurate copy.

Response:

None.