

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND )  
ELECTRIC COMPANY AND KENTUCKY )  
UTILITIES COMPANY TO MODIFY AND )  
RENAME THE BROWNFIELD DEVELOPMENT )  
RIDER AS THE ECONOMIC DEVELOPMENT )  
RIDER )

CASE NO. 2011-00103

RECEIVED

APR 01 2011

ATTORNEY GENERAL'S  
INITIAL DATA REQUESTS

PUBLIC SERVICE  
COMMISSION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to Louisville Gas and Electric Co. and Kentucky Utilities Co. Big Rivers Electric Corporation, Inc. [hereinafter jointly referred to as "LGE-KU"] to be answered by the date specified in the Commission's Order of Procedure, and 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 witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for LGE-KU with an electronic version of these questions, upon request.

(4) 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.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(7) 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.

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

(9) 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 the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts

thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other


forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) 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.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please 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.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,  
JACK CONWAY  
ATTORNEY GENERAL

  
DENNIS G. HOWARD, II  
LAWRENCE W. COOK  
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 Bellar  
Vice President, State Regulation & Rates  
LG&E and KU Services Company  
220 W. Main St.  
Louisville, 40202

Hon. W. Duncan Crosby III  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W. Jefferson St.  
Louisville, KY 40202-2828

F. Howard Bush  
Manager - Tariffs/Special Contracts  
LG&E and KU Energy LLC  
220 W. Main St.  
Louisville, KY 40202

Allyson K Sturgeon  
Senior Corporate Attorney  
LG&E and KU Services Company  
220 W. Main St.  
Louisville, 40202

this 1<sup>st</sup> day of April, 2011

  
Assistant Attorney General

Application Of Louisville Gas & Electric Company and  
Kentucky Utilities Company to Modify and Rename the Brownfield  
Development Rider As The Economic Development Rider  
Case No. 2011-00103  
Attorney General's Initial Data Requests

1. Regarding any and all reduced charges that would be applied to the rates of any entity successfully applying for and receiving service under the contemplated rider, state who would pay for such reduced charges: the companies' shareholders, or their ratepayers?
  - a. If the shareholders, identify for what period of time this would remain true (i.e., is there, or could there conceivably be a point in time at which the ratepayers would start to subsidize the reduced charges of any participant in the contemplated filing)? If so, please provide complete details including any contemplated amortizations.
  - b. Identify what class of ratepayer(s) would be required to absorb any all cost associated with the implementation of the rider.
  - c. If the shareholders, identify any and all circumstances in which the financial risk for subsidizing the reduced charges for service any participant under the contemplated filing would receive could transfer to the ratepayers.
2. Do the companies propose any limits on the number of participants in the contemplated filing? If so please provide details, and state whether your answer could change the responses you provided to questions 1 (a) and (b), above.
3. Do the companies contemplate any attempt to recover for any type or sort of costs incurred, whether directly or indirectly, as a result of providing service under the contemplated filing? If so, please provide complete details.