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December 7, 2004

Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RE: ***In the Matter of the Investigation Into the Membership of Louisville Gas and Electric Company and Kentucky Utilities Company in the Midwest Independent Transmission System Operator***
Case No. 2003-00266

Dear Ms. O'Donnell:

Enclosed please find and accept for filing the original and ten copies of Louisville Gas and Electric Company's and Kentucky Utilities Company's Supplemental Data Requests for Information to The Midwest Independent Transmission System Operator, Inc. in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions or need any additional information, please contact me at your convenience.

Very truly yours,

Kendrick R. Riggs

KRR/ec
Enclosures
cc: Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION INTO THE MEMBERSHIP OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY IN THE MIDWEST INDEPENDENT TRANSMISSION SYSTEM OPERATOR	)	**CASE NO. 2003-00266**

LOUISVILLE GAS AND ELECTRIC COMPANY'S AND KENTUCKY UTILITIES COMPANY'S SUPPLEMENTAL DATA REQUESTS FOR INFORMATION TO THE MIDWEST INDEPENDENT TRANSMISSION SYSTEM OPERATOR

Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") (collectively, the "Companies") submit their initial set of data requests for information to the Midwest Independent Transmission System Operator ("MISO").

As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawings, surveys, emails or other written recorded materials, in electronic or hard copy, whether external or internal, of every kind or description, in the possession of or accessible to MISO, its witnesses, consultants or its counsel. Please identify by name, title, position and responsibility the person or persons answering each of these requests for information for MISO at the bottom of each response.

As used herein, "EMT" is means the Open Access Transmission and Energy Markets Tariff filed by the Midwest Independent System Operator, Inc with the Federal Energy Regulatory Commission.

As used herein, "Studies" or "Analyses" or the combination thereof shall mean investigation, report, examination, breakdown, scrutiny or review of data, information or issues.

Throughout, unless otherwise stated, all page and line references refer to the Rebuttal Testimony of Dr. Ronald R. McNamara, which MISO filed in this Case on November 19, 2004.

1. At page 1 of 89, lines 9 through 18, Dr. McNamara summarizes his educational and professional background.

   a. Please provide a curriculum vitae and/or résumé for Dr. McNamara that includes a complete description of Dr. McNamara's professional certifications, educational and professional background, including each and every time he has testified before a court or regulatory agency, with the subject matter of his testimony, the docket number and the title of the case.

   b. Please identify and provide a copy of each and every paper, report. presentation, speech, or publication that Dr. McNamara has prepared, or which he assisted in preparing, in the course of his professional career which relates to the subject matter of this investigation.

2. At page 2 of 89, lines 8 through 10, Dr. McNamara states that his testimony "provides the results of further analyses done by the Midwest ISO under my direction."

   a. With respect to the cost benefit study, please state each and every person, agent or contractor who conducted the analysis, their role, scope of their engagement, contribution to MISO's analysis, to whom they reported, and provide a copy of each and every document that refers or relates to, or describes, their engagement.

   b. Please state whether MISO obtained, conducted or performed any analyses or studies, under Dr. McNamara's direction or otherwise, in addition to

those previously produced in this proceeding, that would in any way relate to the subject matter of this investigation. If so, please produce a copy of each such analysis or study.

3. At page 4 of 89, lines 9 through 11, Dr. McNamara states that "LG&E/KU occupy a unique position in the middle of the transmission grid for eastern North America. The LG&E/KU system includes transmission elements that regularly constrain interregional power flows." Please identify the attributes of the LG&E/KU system that support Dr. McNamara's assertion that LG&E and KU occupy a "unique position." Please explain the relevance of this assertion to supplying the Companies' native load.

4. Please describe the access fee referenced at page 13, footnote 8 by Dr. McNamara. Please also explain how such access fee is calculated and provide a reference in the EMT that authorizes such fee.

5. Please state whether the Companies must maintain a minimum MW amount of Designated Network Resources ("DNR") equal to their annual peak load plus applicable Kentucky or ECAR planning reserve margin, using the methodology established by Kentucky or ECAR, as applicable. For purposes of this question, assume Kentucky has no state or RRO planning reserve margin requirement, will MISO assign its default minimum planning reserve margin, which is 12%, to the Companies for purposes of satisfying DNR requirements?

6. Please state whether maintaining DNRs in excess of the minimum MW amount of DNRs is optional for the Companies. Does the must-offer requirement apply to DNR MWs in excess of the minimum DNR amount?

7. Please state whether the Companies must submit a self-schedule or offer in the Day-Ahead Energy Market for their DNRs to the extent they are available under the EMT.

8. Please state whether the Companies under the EMT must offer all DNR capacity not otherwise committed at the close of the Day-Ahead Energy Market into the MISO's Reliability Assessment Commitment ("RAC"). Is the purpose of the RAC process under the EMT is to minimize the cost of bringing generation on-line and maintaining reliability.

9. Please state whether the designation of a particular resource as a DNR can be for periods of less than one year. Please state whether new network designations, and redesignations of former DNRs, must be approved by MISO, subject to satisfaction of MISO's deliverability test.

10. Please state whether the consequences of a generation unit being a DNR under the EMT include the following, and if not, please provide a detailed explanation:

a. Generation unit is eligible to receive an allocation of financial transmission rights ("FTRs"), provided the resource has been designated a resource as of the allocation date and for the entire FTR season; and

b. The generation resource is subject to a must-offer requirement.

11. Please state whether the consequences of a generation unit not being a DNR under the EMT include the following, and if not, please provide a detailed explanation:

a. The Companies are ineligible to nominate an FTR sourced at that resource during the FTR allocation process;

b. The generation unit releases any FTRs allocated when the unit was a DNR;

c. The generation resource is exempt from the Day-Ahead and RAC must-offer requirement;

d. The generation unit is at risk for being denied DNR status in the future if it fails MISO's deliverability test at the time of the request; and

e. The generation unit can still participate in the real-time and day-ahead markets.

12. Please state whether (a) FTRs allocated to the Companies are allocated without additional cost; and (b) FTRs purchased in the auction must be paid for in a manner that does not return the price to the Companies.

13. Please state whether under the EMT Day-Ahead Energy Market the Companies have at least the following options for making resources available for purposes of serving their load:

a. Self-schedule (a fixed volume, price-taking supply offer);

b. Generation offer (a price-sensitive offer subject to MISO's economic Day-Ahead optimization); or

c. Identify as operating reserve capacity.

If MISO disagrees with any of these options, please provide a detailed explanation.

14. Please state whether under the EMT, the Companies can reflect, in the price offered in the day-ahead market, the risk associated with resource availability and load fluctuations up to $1,000 per MWh.

15. Please state whether the Independent Market Monitor ("IMM") will mitigate day-ahead prices, or will observe and report to the Federal Energy Regulatory Commission ("FERC") on a quarterly basis.

16. Please state whether under the EMT self-scheduling or generation offers economically or physically connect resources to load.

17. Please state whether under the EMT the Companies's choices in the Day-Ahead market for bidding load include:

a. Fixed demand bid (a fixed-volume, price-taking bid);

b. Price sensitive bid (subject to MISO's economic Day-Ahead optimization); and

c. No Day-Ahead bid (serve from Real-Time Market).

If MISO disagrees with any of these options, please provide a detailed explanation.

18. Please state whether under the EMT the Companies can financially link load to resources by using MISO's financial scheduling software ("finSCHED") to make internal bilateral transactions. Please state whether this link can be made until noon the day after energy flow.

19. Please state whether the choices identified in Data Request Nos. 11, 13 and 17 above result in a settlement process that includes congestion costs and losses.

20. Please state whether all of the Companies' load scheduled upon close of the Day-Ahead Energy Market is allocated a share of any revenue-sufficiency charge resulting from MISO's security-constrained unit commitment ("SCUC") in the Day-Ahead Energy Market. Please state whether under the EMT the Real-Time load deviations from cleared Day-Ahead schedules are allocated any revenue-sufficiency charge resulting from MISO's RAC process.

21. Please state whether under the EMT, the Companies are responsible for their own unit commitment costs arising from Self-Scheduling.

22. Please state whether under the EMT the Companies' choices in the Real-time market for making resources available for purposes of serving their load include:

a. Self-schedule (a fixed volume, price-taking supply offer);

b. Generation offer (a price-sensitive offer subject to MISO's economic dispatch optimization); or

c. Identify as operating reserve capacity.

If MISO disagrees with any of these options, please provide a detailed explanation.

23. Please state whether under the EMT the Companies can reflect, in the price offered in the real-time market, the risk associated with resource availability and load fluctuations up to $1,000 per MWh.

24. Please state whether under the EMT, the IMM can mitigate real-time offers.

25. Please state whether under the EMT all energy settled in the Real-time market will include congestion costs and losses.

26. Please state whether the MISO EMT incorporation of NERC Policy 9 and the MISO EMT RAC process is reconciled to allow for the Companies to avoid being declared energy deficient during emergency supply conditions when online Company-owned generation exceeds the Companies' real-time native energy demand. If not, please state whether and how MISO plans to resolve any conflicts.

27. Please state whether under the EMT the following costs and revenues will be assessed to the Companies in serving their native load under the EMT:

a. Congestion costs net of FTR revenues,

b. Losses,

c. Schedule 16 costs,

d. Schedule 17 costs, and

e. Certain uplift charges

28. At page 17 of 89, lines 3 through 6, Dr. McNamara states, "The reality is that the EMT will (1) allow LG&E/KU to use its own low-cost resources to serve its own resources, *and* (2) also allow LG&E/KU to rely on the ISO's day-ahead and real-time energy markets to serve its loads at even lower costs when other resources can serve those loads at costs less than LG&E/KU's generation costs." Please provide each and every document, and identify each and every fact or article of evidence that supports or provides a basis for Dr. McNamara's assertion that "other resources can serve [LG&E/KU's] loads at costs less than LG&E/KU's generation costs."

29. At page 21 of 89, lines 11 through 12, Dr. McNamara states, "No entity is forced to participate in these markets if it covers its own loads with its own resources or with resources scheduled through a bilateral contract." Based on Dr. McNamara's definition of participation, will the Companies, if they choose not to participate, still be required to pay congestion costs and losses? Are there any other costs the Companies would be required to pay if they choose not to participate?

30. At page 21 of 89, Dr. McNamara also asserts that utilities are free to rely upon the spot markets as much as they choose. To the extent the Companies rely on spot markets, is there an effective mechanism to hedge the congestion costs incurred by the Companies in Real Time? If not, please explain why not. If so, please explain how it will work.

31. At page 23, line 9, Dr. McNamara indicates that marginal losses tend to be higher than average losses. Please explain the quantitative relationship between average losses and marginal losses.

32. At page 24, Dr. McNamara discusses the calculation of congestion under LMP. Please identify the reference bus from which congestion charges are calculated under the Midwest ISO's LMP calculation in the cost-benefit study.

33. At page 28 of 89, lines 3 through 4, Dr. McNamara states that "[g]enerators can self-commit their units in advance and hold them at minimum operating levels for use if and when needed." Please state each and every potential consequence to LG&E/KU under the EMT tariff for such a decision, including all costs, impacts, and exposures to potential risks.

34. At page 31 of 89, lines 8 through 14, Dr. McNamara states: "The EMT does not require a utility to designate any given resource as meeting part of its resource adequacy obligation. The output of any plant that is not designated can be sold to any party, in or outside the Midwest ISO, at the owner's discretion. However, if the owner/utility does designate a plant as meeting its EMT reserve obligation - calling it a "Designated Network Resource" (DNR) - then the owner must choose how it will demonstrate to the ISO the plant's actual availability for possible real-time operation." Please state each and every potential consequence to LG&E/KU under the EMT tariff for such a decision not to designate a resource as a DNR, including the effect on FTR allocation, and all other costs, impacts, and exposures to potential risks.

35. At page 32 of 89, lines 20 through 24, Dr. McNamara states that "[t]he intent of the EMT is that if a party covers its own loads through any of the options provided in the day-ahead time frame, including bilateral and self-scheduling and/or self-commitment of its own resources, and/or purchases from the day-ahead market, it is not subject to additional settlement obligations in the real-time market."

a. Please identify each and every portion of the EMT tariff which supports this contention.

b. Is the revenue sufficiency guaranty ("RSG") to generators committed by MISO during the Day-Ahead market clearing process, i.e., SCUC, assessed to all load clearing the Day-Ahead market, even load served by self-scheduling entities? If not, please explain the SCUC RSG cost assessment methodology.

c. Is the revenue sufficiency guaranty ("RSG") to generators committed by MISO during the post-Day Ahead market reliability assessment commitment ("RAC") assessed to all real-time load deviations from Day-Ahead schedules even load served by self-scheduling entities? If not, please explain the RAC RSG cost assessment methodology.

36. Regarding Dr. McNamara's testimony at page 42, lines 11-20, please:

a. Explain the actual quantitative and qualitative difference in the levels of congestion charges or costs under a marginal clearing price (LMP based) method versus historic methods of charging actual redispatch costs.

b. Provide any estimate of the magnitude of difference between the redispatch costs for LG&E/KU currently and the marginal congestion charges that LG&E/KU will be charged under Midwest ISO's Day 2 market.

37. At page 44 of 89, lines 13 through 15, Dr. McNamara states, "We have examined possible FTR allocations for LG&E/KU (and others) and have determined that LG&E/KU is in *an unusually favorable position* with respect to how transmission limits affect LG&E/KU's ability to serve its own loads at low costs."

a. Please provide all documents and each and every fact, piece of evidence and basis which supports this contention.

b. The cost-benefit analysis Dr. McNamara includes in his Nov. 19, 2004, testimony indicates that the Companies will enjoy revenues from FTRs that exceed congestion charges by about $21 million per year. Please verify that the $21 million represents roughly $56 million in FTR income minus $35.2 million in congestion costs.

c. Please provide supporting detail describing who would pay the $21 million sum, including information describing the impact on any net FTR losers in the situation whereby LG&E/KU receives $21 million in excess revenue from FTRs.

d. In light of the fact that MISO's cost-benefit study consists of a one-year simulation, please provide all documents and studies other than the MISO cost-benefit study to support the contention that the Companies might expect to receive the same level of excess FTR revenues beyond 2005 (for the period 2006 through 2010).

e. Please provide an itemized list of all FTRs included in the portfolio which generate the $21 million in excess FTR revenue, including source, sink and volume by season and peak type.

38. At page 50, Dr. McNamara states that the Companies could not achieve the benefits of an RTO through an alternative described by the Companies. One of the alternatives the Companies considered -- in accordance with the Commission's Order – is the PJM RTO.

a. Please provide a side-by-side list of the RTO services, as defined by Order Nos. 888, 889 and 2000, that PJM provides and MISO will provide as of March 1, 2005.

b. With regard to any functions PJM is providing that MISO will not be providing as of March 1, 2005, please provide an estimate of the MISO's expected costs associated with providing those functions.

39. At page 52, line 12-17, Dr. McNamara states that "There is no apparent logic for a Kentucky utility to be considering joining an RTO so far distant from its own transmission system and no apparent reason to believe that this arrangement could benefit Kentucky in any way."

a. Is MISO planning to negotiate a joint operating agreement that would address coordination of SPP's proposed real-time imbalance market with MISO's Day 2 real-time market?

b. Will MISO coordinate the operation of its real-time market with SPP's proposed real-time market?

40. At page 53, line 14, Dr. McNamara states that he is using an expanded modeling analysis. Please identify the data used that resulted in each and every change between the expanded analysis and the initial modeling analysis (which is referenced at lines 8-9 on page 53), the reason for each change and please quantify the impact of each change.

41. At page 55, lines 6-10, Dr. McNamara states that MISO's "modeling suggests operating additional generating capacity at the Trimble County site may in some circumstances further constrain transmission, limit regional power flows, and be more costly than locating

generation in other portions of the LG&E/KU system." Please describe the basis and provide all data, methodology and supporting analyses used for this assertion.

42. Please reference page 55, lines 6 *et seq.*. Were any transmission upgrades identified and approved by MISO for Trimble County 2 included in the modeling conducted for the cost-benefit study?

43. (Page 55, Line 23-25) Please provide all data, quantifications and a description of the methodology used to support the assertion that there will be "significant negative reliability impacts on LGE/KU customers" if LG&E/KU were to withdraw from the MISO.

44. With reference to page 57, lines 14 *et seq.*, please provide any quantifiable data in electronic format (e.g., Excel spreadsheets) other than the cost-benefit study performed by MISO to support the assertion that "the presence of a large, efficient regional market adjacent to LG&E/KU will tend to depress prices for LG&E/KU generation in comparison to both current prices and the prices available to LG&E/KU as members of the Midwest ISO."

45. With reference to page 58, lines 6 *et seq.*, please provide any data in electronic format (e.g., Excel spreadsheets) to support the assertion that LG&E/KU transmission revenues will not decrease in light of the elimination of the regional through-and-out rate in MISO and PJM and the likely reduction in use of PTP transmission within the MISO upon the start of the Day 2 market.

46. At page 66, lines 7-17, Dr. McNamara states that he identified a "frequently occurring pattern in the location specific prices for the LG&E/KU system" that showed "prices at the Trimble County facility were often lower than LG&E/KU generating sites downstream. . ." Please describe the basis and provide all data, methodologies and supporting analyses used for

the assertion that a savings of nearly $1 million per year could be achieved if the combustion turbines were placed at the Ghent plant site rather than at Trimble County.

47. With reference to page 70, lines 1-3, please provide data in electronic format (e.g., Excel spreadsheets) on the four tier illustrative FTR allocation results, including without limitation, the percent of peak load FTR that was nominated by each MISO market participant.

a. Did all market participants provide input in the mock allocation?

b. What assumptions were made for market participants that did not provide input in the mock allocation?

48. At page 71, lines 13-15, Dr. McNamara states that "There is no reason to believe that the difference between the cost to serve load under the TORC option and in the Midwest ISO will change materially over the period 2005-2010." Please provide all data, methodologies and supporting analyses used for this assertion.

49. At page 73, line 12 *et seq.*, Dr. McNamara describes how he developed the hurdle rates used in his analyses. Please provide a table that summarizes the hurdle rate assumptions and values for all cases in his analyses.

50. With reference to page 73, lines 1-2, please provide the data in electronic format (e.g., Excel spreadsheets) to support the 9% reduction in LG&E/KU flowgate capacities.

51. At page 84, lines 16-20, Dr. McNamara states that "Mr. Gallus' assumption that he is identifying all cost effective transactions is simply wrong."

a. Please provide all empirical data in MISO's possession that supports MISO's claim that Mr. Gallus' assumption is wrong.

b. Please provide all empirical data in MISO's possession that supports MISO's claim that the Companies could be making twice the volume of cost effective off-system sales that they have been making in recent years.

52. With reference to page 85, lines 10-15, if LG&E/KU remained a MISO member, would LG&E/KU no longer experience loop flows from Big Rivers, EKPC, or TVA for which LG&E/KU receive no compensation?

53. Please refer to Section VII, pages 53-89 of Dr. McNamara's testimony. Please provide all data, work papers and any other supporting documents that were used by Dr. McNamara or by any persons that Dr. McNamara supervised in the preparation of the cost-benefit study for which Dr. McNamara provides testimony in this proceeding. Please provide all electronic files, such as Excel Spreadsheets, Access Databases, CSV files (i.e., test files) and files that are the product of any computer software programs that were used in the conduct of the study about which Dr. McNamara testifies.

54. Please provide on disk all Microsoft Excel files, Microsoft Access files or other formats associated with or that form the basis for the tables attached to Dr. McNamara's testimony.

55. During the period in which it conducted its cost benefit analysis, did MISO consult directly with the Companies regarding the data inputs, assumptions or other aspects of modeling that were included in the MISO cost benefit analysis that pertained directly to the LG&E/KU system (generation facilities or transmission assets)? If yes, please provide the dates of those consultations, the persons contacted and a list of the information or copies of the information for which MISO sought consultation on.

56. What is the estimate of the MISO Schedule 10 rates if the 15 cents per MWh cap were not imposed? In other words, if there were no cap on the Schedule 10 rate and the MISO were to recover the costs it has allocated to Schedule 10 in the same way as it is currently allocating and recovering costs to Schedules 16 and 17 (from an accounting and cost recovery perspective), what would the rate be?

57. In the market simulation conducted by MISO with Promod IV, specifically state whether the bilateral market or the existence of forward contracts was included in the model. If not please state whether the simulation results would be any different if you had considered the bilateral market or the existence of forward contracts and explain any such differences.

58. In the market simulation conducted by MISO with Promod IV, specifically state whether self-commitment or self-scheduling was included in the model. If so, please list the units that were assumed to be self-committed or self-scheduled and explain the criteria for making these assumptions. If not, how would the inclusion of self-commitment or self-scheduling of units change the simulation results?

59. In reference to Exhibit RRM, Table 4, "Off System Sales Comparison", in the row labeled "Ave. Hourly LGE Gen Price ($/MWh)" for the column labeled "MISO Day 1 Operations" shows a value of $17.67 and for the next column labeled "Day 2 LGE in MISO" shows a value of $18.94.

a. Please provide a detailed explanation of the table headers/labels.

b. Is the value of $17.67 ($/MWh) for the "MISO Day 1 Operations" an estimate of the average price that LG&E/KU receives for its off-system sales in the current Day 1 market?

c. Is the figure of 10,283,998 MWh in the row labeled "LGE Off-System Sales MWH" an estimate of the LG&E/KU off-system sales in the current Day 1 market?

d. Please provide a table summarizing the average monthly day-ahead and real-time market clearing prices in PJM, NY ISO and ISO NE over the past 3 years or provide Web addresses to the sites or documents at these three RTOs where such information can be found.

60. With regard to MISO's cost-benefit analysis, does it include any costs that MISO is currently deferring related to market start up or market design? If so, please identify those costs. If not, please provide a detailed accounting of all such costs that MISO is incurring or has incurred related to Day 2 markets that it is not currently recovering. If possible, please provide this data by FERC account if available by FERC account.

61. In the Promod IV model simulations conducted for the MISO's cost-benefit study, how are the loads distributed across all the nodes in the model? Does this distribution of loads change during the 8760 hour simulation?

62. Is Dr. McNamara contend that joining a centrally administered market with (arguendo) net benefits for the entire market, that there are also net efficiency gains for each and every joining party? Is Dr. McNamara's position that there cannot under any circumstances be cost shifting such that there may be a net loss for some at the gain of others? Please provide the net savings for each and every MISO member that result from the EMT, consistent with that provided for LG&E/KU.

63. Referring to page 68, line 24 of Dr. McNamara's testimony, please explain what is meant by the phrase "generation centric perspective"?

Dated: December 7 , 2004

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Initial Data Requests was served via first class U.S. mail, postage prepaid, this 7th day of December 2004, upon the following persons:

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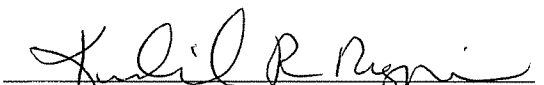

Counsel for Louisville Gas and Electric Company
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