

Commonwealth of Kentucky
Before the Public Service Commission

In the Matter of:

THE UNION LIGHT, HEAT AND POWER)
COMPANY'S INTEGRATED RESOURCE PLAN)

Case No.)
2004-00014)

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JUL 30 2004

PUBLIC SERVICE
COMMISSION

**Attorney General's Request for Information
From Union Light, Heat, and Power Company**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Requests for Information to the Union Light, Heat and Power Company, 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) 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.

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

(5) 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.

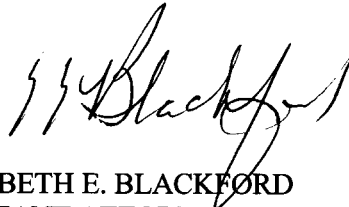
(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(7) 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.

(8) 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.

(9) 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.

Respectfully submitted,
GREGORY D. STUMBO
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read "Elizabeth E. Blackford". The signature is written in a cursive style with a large initial "E" and "B".

ELIZABETH E. BLACKFORD
ASSISTANT ATTORNEY GENERAL
Office of Rate Intervention
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
(502) 696-5453

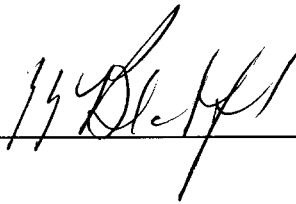
CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 29th day of July, 2004, I have filed the original and ten copies of the foregoing with the Executive Director of the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

JOHN J FINNIGAN JR ESQ
THE UNION LIGHT HEAT & POWER CO
139 E FOURTH STREET
CINCINNATI OH 45202

MICHAEL J PAHUTSKI ESQ
THE UNION LIGHT HEAT & POWER CO
139 E FOURTH STREET
CINCINNATI OH 45202

IRIS SKIDMORE ESQ
OFFICE OF LEGAL SERVICES
NRE DOE
5TH FLOOR CAPITAL PLAZA TOWER
500 MERO STREET
FRANKFORT KY 40601



**Attorney General's Request for Information
From Union Light, Heat, and Power Company
Case No. 2004-00014**

1. On page 5-5 of the IRP, two co-generation tariffs are mentioned.
 - a) Please supply the most recent versions of these tariffs.
 - b) Do these include the new requirements net metering? If not, please supply the tariff that covers net metering.

2. The IRP analysis includes a sensitivity scenario that considers 10% higher gas costs.
 - a) Please provide the base case gas costs assumed.
 - b) Please provide the sensitivity case gas prices assumed.
 - c) Please provide the average monthly actual gas costs paid by Cinergy for each of the last 12 months.

3. On page 5-14 of the IRP, the use of landfill gas for power generation is dismissed as uneconomical. Given that East Kentucky Power is currently building landfill gas powered plants, please detail the nature and extent of Cinergy and/or ULH&P's investigation or study that has lead them, individually or collectively, to dismiss these plants as uneconomical. Include copies of any reports resulting from such investigation or study. If no study or investigation has been done, please detail the basis for the belief that such plants are uneconomical.

4. On pages 1-11 and 5-4, the EPRI TAG costs are mentioned. Please supply the 'over 100 supply side options' considered, along with all cost assumptions associated with each option.

5. On page 5-17, a report entitled "Repowering the Midwest" is mentioned. Please supply this report.

6. On page 5-18, conventional hydro is dismissed as site specific. Considering all of the available dams in the region without hydro, and the offers of new hydro that have been made to Cinergy, please explain why conventional hydro was not considered in the analysis of this IRP.

7. On page 8-36 of the IRP, 6 greenhouse gasses are mentioned. For each of these six gasses separately, please provide the following:
 - a) Emissions by ULH&P for each of the last 15 years.
 - b) Emissions by Cinergy for each of the last 15 years.
 - c) Projected emissions by ULH&P in each of the next 15 years.
 - d) Projected emissions by Cinergy in each of the next 15 years.

8. Please provide the KWH power generations for:
 - a) ULH&P for each of the last 15 years.
 - b) Cinergy for each of the next 15 years.
 - c) Projected ULH&P generation for each of the next 15 years.

d) Projected Cinergy generation for each of the next 15 years.

9. With respect to Table GA-45-C, please explain why the projected price of SO₂ allowances drops so dramatically after 2010.

10. On Table GA-25-C, the lowest cost option appears to be the battery option. Please explain why this option was not considered as an option when considering the optimum generation plan.

11. Follow-up to KDOE Item 1-16. The Green Power Rider was put in place in October 2002:

- a) Please provide the participation to date.
- b) What publicity has been done to promote this new rider?
- c) Please provide a detailed description of the power that has been purchased to date, including seller, fuel source, and amount of power.