

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

THE APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY TO CONSTRUCT)
FLUE GAS DESULPHURIZATION SYSTEMS AND)
APPROVAL OF ITS 2004 COMPLIANCE PLAN FOR)
RECOVERY BY ENVIRONMENTAL SURCHARGE)

Case No. 2004-00426

**SUPPLEMENTAL REQUEST FOR INFORMATION
POSED BY THE ATTORNEY GENERAL**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Supplemental Request for Information to Kentucky Utilities 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.

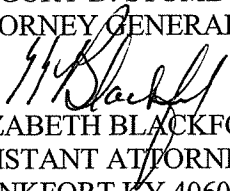
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(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



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CERTIFICATE OF SERVICE AND NOTICE OF FILING

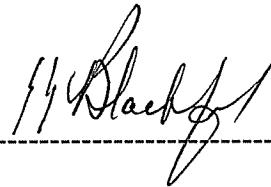
I hereby give notice that this the 23rd day of February, 2005, I have filed the original and ten copies of the foregoing Supplemental Request for Information with the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

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**Supplemental Request for Information
Posed by the Attorney General to
Kentucky Utilities Company
Case No. 2004-00426**

1. Refer to the response to question 6 that indicates that R(m) has always exceeded E(m). The question is restated as follows: Please provide an example and elaborate on the circumstances or conditions where the monthly “Environmental Cost Recovery Surcharge” jurisdictional revenues derived from applying the monthly Environmental Surcharge Factor to all electric rate schedules **would exceed** the jurisdictional total of each approved environmental compliance plan revenue requirement of environmental compliance costs that are over and above the revenues associated with “Base Environmental Surcharge Factor.” In other words, are there circumstances when more revenues could be collected than are intended, and if so, what are they?

2. Refer to the response to question 7 that indicates that the Environmental Surcharge Billing Factor would have to exceed 100% . The question is restated as follows: Please provide an example and elaborate on the circumstances or conditions where the monthly “Environmental Cost Recovery Surcharge” jurisdictional revenues derived from applying the monthly Environmental Surcharge Factor to all electric rate schedules **would be less than** the jurisdictional total of each approved environmental compliance plan revenue requirement of environmental compliance costs that are over and above the revenues associated with “Base Environmental Surcharge Factor.” In other words, are there circumstances when less revenues are collected than are intended and if so, what are they?