## DORSEY, KING, GRAY, NORMENT & HOPGOOD

#### ATTORNEYS-AT-LAW

JOHN DORSEY (1920-1986)
FRANK N. KING, JR.
ETEPHEN D. GRAY
WILLIAM S. NORMENT, JR.
L. CHRISTOPHER HOPGOOD

S MADISON GRAY

318 SECOND STREET
HENDERSON, KENTUCKY 42420

TELEPHONE (270) 826-3965 TELEFAX (270) 826-6672 www.dkgnlaw.com

April 1, 2005

Ms. Elizabeth O'Donnell
Executive Director
Public Service Commission of Kentucky
Post Office Box 615
Frankfort, Kentucky 40601

APR 1 2005

PUBLIC SETTVICE COMMISSION

Re:

Kenergy Corp.

Case No. 2004-00446

Dear Ms. O'Donnell:

Enclosed for filing please find Kenergy's Requests for Information to

KIUC.

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, KING, GRAY, NORMENT & HOPGOOD

By

Frank N. King, Jr.

If-/cds

Encls.

Copy/w/encl.: Attorney General, Utility Intervention and Rate Division

Michael L. Kurtz, Esq.

Mr. Mark A. Bailey, Kenergy Corp. Mr. Steve Thompson, Kenergy Corp. DKGN&H

#### **COMMONWEALTH OF KENTUCKY**

#### BEFORE THE PUBLIC SERVICE COMMISSION

1 2u05 APR PUBLIC SERVICE

In the Matter of:	)
	)
THE APPLICATION OF KENERGY	CORP.) CASE No. 2004-00446
FOR A REDUCTION IN REVENUE A	AND )
ADJUSTMENT IN EXISTING RATE	S )

#### REQUESTS FOR INFORMATION TO INTERVENOR

#### KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. FROM

#### KENERGY CORP.

DORSEY, KING, GRAY, NORMENT & HOPGOOD 318 Second Street Henderson, Kentucky 42420 (270) 826-3965 Telephone (270) 826-6672 Telefax **Attorneys for Applicant** 

FRANK N. KING, JR.

I hereby certify that the foregoing has been served upon the Attorney General of Kentucky, Office of Rate Intervention, 1024 Capital Center Drive, Frankfort, Kentucky 40601, and Michael L. Kurtz, Esq., Boehm, Kurtz & Lowry, 36 East Seventh Street, Suite 2110, Cincinnati, Ohio 45202, by mailing a true and correct copy of same on this 1<sup>st</sup> day of April, 2005.

- Total 01 05 03:15p

DKGN&H

# REQUESTS FOR INFORMATION TO INTERVENOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. FROM KENERGY CORP. Case No. 2004-00446

- 1. Please refer to the Commission's April 22, 2004, order in Case No. 2003-00165 in which the KIUC Members received rate reductions (determined to be in the collective amount of \$144,911.00 in a later order) and in which the Commission stated on page 18: "Absent a significant change in Kenergy's circumstances, there is no basis for any further reductions to these distribution adders."
  - a. Does KIUC contend there has been a "significant change" in Kenergy's circumstances that provides a basis for further reductions to KIUC Members?
  - b. If the response to 1.a. is yes or in the affirmative please explain fully and in detail the significant change(s) in circumstances.
  - c. If the response to 1.a. is no or in the negative does KIUC contend that the requirement of a "significant change" in Kenergy's circumstances as a condition for further reductions no longer applies? If so, please explain fully and in detail the reasons.

DKGN&H

### REQUESTS FOR INFORMATION TO INTERVENOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. FROM KENERGY CORP. Case No. 2004-00446

2. Please refer to the Direct Testimony of Russell L. Klepper, page 13, lines 1 and 2 in which the statement is made that "The KIUC Members have not investigated whether these increases in Total O & M Costs, Depreciation Expense, and Interest on Long Term Debt are justified or prudent . . ." If such an investigation is undertaken KIUC is requested to file and serve in this case the complete results of the investigation in a timely manner and prior to the hearing in this case. Will KIUC agree to do this?

\* \* \* \* \* \* \* \* \*