

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

IN THE MATTER OF:

JUN 30 2005

APPLICATION OF KENTUCKY UTILITIES COMPANY)
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY FOR THE CONSTRUCTION OF)
TRANSMISSION FACILITIES IN FRANKLIN,)
WOODFORD AND ANDERSON COUNTIES, KENTUCKY)

PUBLIC SERVICE
COMMISSION

CASE NO. 2005-00154

DATA REQUESTS OF KENTUCKY UTILITIES COMPANY
TO CONCERNED CITIZENS AGAINST POWER LINE EXTENSION

Kentucky Utilities Company ("KU") respectfully submit the following data requests to Intervenor, Concerned Citizens Against Power Line Extension ("Citizens"), to be answered by the date specified in the Commission's Order of Procedure herein.

Instructions

1. As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawing, surveys or other written recorded materials, whether external or internal, of every kind or description, in the possession of or accessible to Citizens, its witnesses or its counsel. And, as used herein, "you" refers to Citizens, each and every individual member of Citizens, and Citizens' agents, representatives, officers, employees, directors and counsel.

2. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

3. These requests shall be deemed continuing so as to require further and supplemental responses if Citizens receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

5. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

6. If Citizens has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for KU as soon as possible.

7. For any document withheld on the ground 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.

8. In the event any document requested has been destroyed or transferred beyond the control of Citizens, or any of their witnesses, state: the identify 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 transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer KU to the record where the document is located.

Data Requests

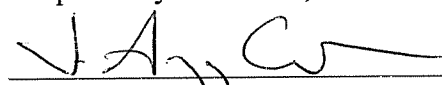
1. Have you performed, requested or commissioned any review, study or analysis regarding the transmission project which is the subject of this proceeding (including, but not limited to, the need, location/route or impact of said project)? If so, produce copies of each such review, study or analysis, and any documents or reports relating thereto, and state the name and address of the person(s), group or entity which performed each such study or analysis.

2. Have you retained any consultant or expert to testify in this proceeding? If so, state the name and address of such consultant or expert, produce a copy of his or her current curriculum vitae, and summarize his or her expected testimony.

3. Produce copies of all documents, if any, you expect or intend to offer into evidence during the public hearing of this proceeding.

Dated: June 30, 2005

Respectfully submitted,



Kendrick R. Riggs
J. Gregory Cornett
OGDEN NEWELL & WELCH PLLC
1700 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
(502) 582-1601

Robert M. Watt, III
Lindsey W. Ingram, III
Stoll, Keenon, and Park, LLP
300 West Vine Street, 2100
Lexington, Kentucky 40507

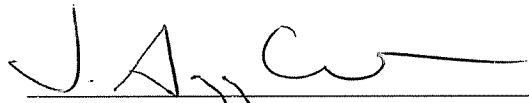
Elizabeth L. Cocanougher
Senior Corporate Attorney
LG&E Energy LLC
220 West Main Street, Box 32010
Louisville, Kentucky 40232
(502) 627-4850

Counsel for Kentucky Utilities Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Data Requests For Information was served upon the following parties by regular mail, postage prepaid, on this 30th day of June, 2005.

Laurie K. Dudgeon
Hazelrigg & Cox, LLP
415 West Main Street
Box 676
Frankfort, KY 40602.

A handwritten signature in black ink, appearing to read "J. Gregory Cornett", written over a horizontal line.

J. Gregory Cornett
Counsel for Kentucky Utilities Company