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April 24, 2006

Honorable John J. Finnigan, Jr.
Senior Counsel
The Union Light, Heat and Power Company
139 East Fourth Street
Cincinnati, OH 45202

RE: Case No. 2006-00101

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact Faud Sharifi at (502) 564-3940 ext. 426.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth O'Donnell".

Beth O'Donnell
Executive Director

BOD/sh
Enclosure

Honorable John J. Finnigan, Jr.
Senior Counsel
The Union Light, Heat and Power
Company
139 East Fourth Street
Cincinnati, OH 45202

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF THE UNION LIGHT, HEAT)
AND POWER COMPANY FOR A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY) CASE NO. 2006-00101
TO CONSTRUCT GAS DISTRIBUTION FACILITIES)
WITHIN ITS SERVICE TERRITORY)

FIRST DATA REQUEST OF COMMISSION STAFF TO
THE UNION LIGHT, HEAT AND POWER COMPANY

The Union Light, Heat and Power Company ("ULH&P"), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 6 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 10 days from the date of this request. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Provide, for each module, the length, the type of material, and the diameter of the pipes that will be replaced, the costs of replacement, and the name of the contractor.

2. Provide the estimated line lengths and costs for the proposed CIMOS replacements, BSMOS replacements, and service line replacements.

3. Did ULH&P conduct a competitive bid process to select the contractors for its proposed construction? Explain the response.

4. Provide three copies of the latest ULH&P construction manual that was provided to the construction contractors and inspectors.

5. Refer to the Supplemental Application, page 2. Provide an estimated cost of operation and maintenance for the proposed facilities. This estimated cost should be ULH&P's best estimate of operations and maintenance costs based on previous AMRP construction modules or projects or other projections that the company determines to be reasonable.



Beth O'Donnell
Executive Director
Public Service Commission
Post Office Box 615
Frankfort, Kentucky 40602

DATED April 24, 2006

cc: Parties of Record