

**BOEHM, KURTZ & LOWRY**

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**Via Overnight Mail**

June 30, 2006

Beth A. O'Donnell, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

**RECEIVED**

JUL 3 2006

PUBLIC SERVICE  
COMMISSION

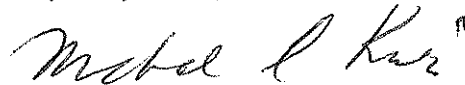
Re: Case No. 2006-00130

Dear Ms. O'Donnell:

Please find enclosed the original and twelve (12) copies of the First Set of Data Requests of Kentucky Industrial Utility Customers, Inc. to Louisville Gas & Electric Company in the above-referenced matter. By copy of this letter, all parties listed on the Certificate of Service have been served.

Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.  
**BOEHM, KURTZ & LOWRY**

MLKkew  
Attachment  
cc: Certificate of Service

**CERTIFICATE OF SERVICE**

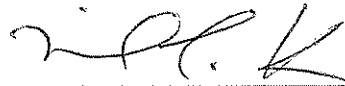
I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by first-class postage prepaid mail, (unless otherwise noted) to all parties on the 30<sup>th</sup> day of June, 2006.

Honorable Elizabeth E. Blackford  
Assistant Attorney General  
Office of the Attorney General  
Utility & Rate Intervention Division  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601-8204  
[betsy.blackford@law.state.ky.us](mailto:betsy.blackford@law.state.ky.us)

Honorable Elizabeth L. Cocanougher  
Senior Corporate Attorney  
Kentucky Utilities Company  
c/o Louisville Gas & Electric Co.  
P. O. Box 32010  
Louisville, KY 40232-2010

Honorable Kendrick R. Riggs  
Ogden, Newell & Welch, PLLC  
1700 PNC Plaza, 500 West Jefferson Street  
Louisville, KY 40202-2874  
[kriggs@ogdenlaw.com](mailto:kriggs@ogdenlaw.com)  
**(Via Electronic Mail)**

Mr. Michael S. Beer  
VP - Rates & Regulatory  
Kentucky Utilities Company  
c/o Louisville Gas & Electric Co.  
P. O. Box 32010  
Louisville, KY 40232-2010



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Michael L. Kurtz, Esq.  
Kurt J. Boehm, Esq.

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter Of: Examination By The Public Service :  
Of The Environmental Surcharge Mechanism Of Louisville Gas & Electric :  
Company For The Six-Month Billing Periods Ending October 31, 2003 :  
April 30, 2004, October 31, 2004, October 31, 2005 and April 30, 2006 and :  
And For The Two Year Billing Periods Ending April 30, 2005 :

Case No. 2006-00130

**RECEIVED**

JUL 3 2006

PUBLIC SERVICE  
COMMISSION

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**FIRST SET OF DATA REQUESTS OF  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.  
TO LOUISVILLE GAS & ELECTRIC COMPANY**

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**Dated: June 30, 2006**

## DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
11. "LG&E" means Louisville Gas & Electric Company and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.
12. "KU" means Kentucky Utilities Company, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

## INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total company as well as Intrastate data, unless otherwise requested.

**KIUC's FIRST SET OF DATA REQUESTS TO  
LOUISVILLE GAS & ELECTRIC COMPANY  
PSC CASE NO. 2006-00130**

- Q1. Please provide a copy of the cost of service study used to generate the class rate of return results shown in Mr. Seelye's Table 1.
- Q2. Please provide all spreadsheets, in electronic form, with formulas intact, used to develop the rates of return at "compliance rates" shown in Mr. Seelye's Table 1.
- Q3. Please provide the spreadsheets, in electronic form, with formulas intact, used to develop Sealy exhibits WSS-2 and WSS-3. Include the spreadsheets, with formulas intact, of the exhibits themselves.
- Q4. Please refer to Table 1 of Mr. Seelye's testimony and provide the following information:
- a. the dollar amount of subsidy by rate class under current rates;
  - b. the dollar amount of subsidy reduction by rate class under the Alternative Methodology roll-in;
  - c. the amount of total revenue by rate class;
  - d. the amount of kWh sales by rate class.
- Q5. For the first twelve months after the roll-in, please project the dollar amount of environmental surcharge revenue on a total Company basis assuming that the Companies' filings in Case Nos. 2006-00208 and 2006-00206 are approved.
- Q6. Please provide the rate schedules for the Company under the Alternative Methodology base rate roll-in and under the total revenue roll-in methodology.
- Q7. For each of the KIUC customers listed below, please provide a billing analysis using 12 month of representative data showing the cost differential between the two base rate roll-in alternatives. We consider this individual customer data to be confidential pursuant to 807 KAR 5:001(7), and ask that it be provided pursuant to a protective order.

Arch Chemicals  
Carbide Graphite LLC  
E.I. DuPont de Nemours & Company  
Ford Motor Company  
General Electric – Appliance Park  
Golden Foods

Kosmos Cement  
MeadWestvaco  
Oxy Vinyls  
Protein Technologies  
Rohm & Haas

Respectfully submitted,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

**BOEHM, KURTZ & LOWRY**

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Cincinnati, Ohio 45202

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**COUNSEL FOR KENTUCKY INDUSTRIAL  
UTILITY CUSTOMERS, INC.**