Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 6

- Q-6. Please reference the Application, at page 5 paragraph 11.
 - A. Provide a visual description of the information displayed to customers via the internet.
 - B. In addition to the hourly pricing information, will any other information be available to customers on this website (i.e., current or real-time consumption data, previous consumption data, yearly or monthly consumption data or a running total)?
- A-6. Please see response to A-22.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 7

- Q-7. Please reference the Application, at page 5 paragraph 12.
 - A. Please clarify what is meant by the term "Day-ahead" in reference to hourly pricing?
 - B. Is this term to be read to mean the twenty-four (24) hour period following the setting of the posted hourly prices?
 - C. Please clarify when the posted hourly prices take effect (i.e., do the prices go into effect the following day at 4 p.m., at the same evening at midnight, or something else)?
 - D. If the posted hourly prices go into effect the same evening at midnight, does the company believe that customers will be able to respond adequately to the pricing signal?
- A-7. A. The term "Day-ahead" refers to a list of 24 hourly prices representing a price for each hour of the day. The first hour of the day is the hour beginning at 12:00 midnight and ending at 1:00 a.m. The last hour of the day is the hour beginning at 11:00 p.m. and ending at 12:00 midnight. The 24 hourly day-ahead prices will be posted no later than 4:00 p.m. of the day previous to their being effective.
 - B. See response to A-7. A. above.
 - C. See response to A-7. A. above.
 - D. The Companies believe 8 hours (4:00 p.m. to 12:00 midnight of the same day) is a reasonable amount of time to respond.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 8

Witness: Butch Cockerill (A, B) / Kent W. Blake (C, D)

- Q-8. Please reference the Application, at page 6 paragraph 13.
 - A. Is the projected pilot cost of \$935,000.00 based upon 100% participation?
 - B. If less than 100% participation is achieved, what incremental costs does the company estimate will be saved for each "lost participant?"
 - C. What portion of this budgeted amount does the company expect to be recovered through base rates?
 - D. As participants are to be charged for their actual usage at their current tariff rate plus or minus the difference between their actual and historic at pilot program rates, does the possibility exist for over or under recovery from individual participants? If so, how does the company propose to allocate such over or under recovered funds?
- A-8. A. No. The projected pilot cost was produced for budget purposes and is based on participation of 100 customers for the Meter Assets, Meter Reading, Customer and Revenue Accounting costs. All other costs would be the same whether one customer or all 183 eligible customers participate.
 - B. The incremental costs saved for each customer less than the 100 used for budget purposes would be Meter Assets capital cost of \$900 and Meter Reading, Customer and Revenue Accounting annual O&M cost of \$655.
 - C. The Companies are requesting recovery of all pilot costs not recovered in current base rates in the Program Charge assessed the RTP participants. Current rates include the capital cost of a meter (\$250/customer) and meter reading O&M cost (\$12/customer/month). The Program Charge is based upon 100% participation and since the pilot is a voluntary program, the Companies do not expect all eligible customers will participate. Therefore, the Companies are requesting recovery of any program costs not recovered through the

Program Charge in subsequent base rates.

D. No. The Program Charge is a fixed monthly charge designed to recover the incremental costs not recovered in current tariff rates and does not vary with the amount of usage.

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Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 9

- Q-9. Please reference the Application, page 6, paragraph 14. If less than 100 participants are enrolled in the program, does the company intend to attempt to solicit additional participants or will the program continue with less than 100 participants?
- A-9. The Companies do not intend to attempt to solicit additional participants outside the 183 customers available for the program. Any customer served under the eligible rate schedules will be able to participate in the program during the term of the pilot. The program will continue with less than 100 participants.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 10

Witness: Kent W. Blake

Q-10. Please reference the Application, page 6, paragraph 14. If there are less than 100 participants enrolled in the program, is there a point when the company believes the lack of adequate participation in the program would require its modification or cancellation (i.e., a point where the lack of participation would make the program unfeasible or the results obtained therefrom unrepresentative of the participant classes)?

A-10. No. Please see response to A-9.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 11

Witness: Butch Cockerill

- Q-11. What steps or efforts will the company utilize to educate or otherwise inform Pilot participants on ways to reduce energy consumption or shift their load? Will these efforts be continuous and on-going in nature?
- A-11. The primary contact with the potential customers for this pilot will be our Major Account Representatives. One of the major roles for our account representative is to work directly with their assigned customers on an on-going basis to address their energy needs, such as reducing energy consumption or load shifting. Once this pilot program is approved, the account representative will contact potential customers, who may benefit from this pilot, to discuss the customer's interest in participating.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 12

- Q-12. Please describe the anticipated demographics of the expected pilot program participants (i.e., industry type, size, location, etc.).
- A-12. The Companies do not have the demographics for all customers eligible for the program nor can the Companies anticipate which of the eligible customers will opt to participate in the program. It would not be expected that high load factor customers (example, chemical companies running at 85% load factor) would be able to shift enough load to take advantage of this offering. Expectations aside, it is known that:
 - 1. LG&E has 69 eligible commercial customers and 59 eligible industrial customers over 2MW and less than 50MW. All these customers are in the Louisville metropolitan area. Their interests vary greatly and include but may not be limited to;
 - Manufacture of food, clothing, chemicals, rubber, stone, metals, electrical equipment, and automobiles
 - Commercial enterprises, metropolitan services, hospitals, and colleges.
 - 2. KU has 43 eligible commercial/industrial customers and 11 eligible mining customers over 5MW and less than 50MW. In addition, KU has 1 large industrial customer over 100MW. These customers operate throughout the KU service territory across the entire State. Their interests are similar to those of the eligible LG&E customers with a significant added interest in mining.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 13

- Q-13. Please reference the Application, page 6, paragraph 14. Did the company consider splitting the program cost between ratepayers and shareholders?
- A-13. No, because the Companies will receive no financial benefit from the Pilot. All cost savings of the Pilot will inure to the benefit of the Companies' customers, both Pilot participants and otherwise. For example, if Pilot customers shift sufficient load to lower-cost hours to prevent the need to run higher-cost units such as combustion turbines, Pilot customers will save directly through lower energy costs and non-Pilot customers will save through lower fuel costs. Indeed, insofar as programs of this sort serve to reduce demand durably, the need to build additional generation is delayed, which provides additional rate benefits to the Companies' customers.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 14

Witness: Butch Cockerill

- Q-14. Is the communication technology deployed by the pilot failsafe with no possibility of error? If not, what are the precautions undertaken by the company to eliminate any possible errors?
- A-14. No. Please see response to Q-5.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 15

Witness: Kent W. Blake

- Q-15. Please provide a detailed explanation why the proposed rate structure for this pilot program differs from that proposed for the Residential/General Service customers in Case No. 2007-00117 (i.e., the rate proposed in 2007-00117 was based on real-time pricing with no correction factors and involved a rate structure which the company represented was based upon cost of service, whereas this program proposes to maintain the existing rate structure with the application of a "Customer Baseline Load" correction factor).
- A-15. The Companies believe there is a fundamental difference in the types of customers involved and the ability of the different types of customers participating in each program to respond to varying prices. There are no correction factors in either program.

The Residential/General Service design relies on a more structured approach with known time periods and prices but also incorporates a critical cost period based upon real-time critical peak events and costs. This structure enables residential and general service customers to enjoy the price benefits of load-shifting without having to monitor energy usage and pricing on an hourly basis.

The RTP Pilot designed for larger customers has a much more fluid pricing aspect based on near time expected market conditions and varying by each hour. This type of customer typically has the capability and resources to monitor energy usage and pricing on an hourly basis.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 16

Witness: Butch Cockerill

- Q-16. Please reference Exhibit SLC-1. Under the descriptions "Software Implementation Costs", provide a detailed explanation as to what this includes for each item.
- A-16. <u>Software Implementation Costs MV90- PBS: \$80,000</u>
 Approximately 12 weeks of on-site consulting and training by software vendor consisting of the following tasks:
 - Requirements Definition
 - Data Acquisition and Utilization Review
 - Install and Configure Complex Billing Solution
 - Prototype Rate Modeling
 - Training (Basic, Scripts and Rates Modeling)
 - Complex Billing Acceptance
 - Complex Billing Project Management

<u>Software Implementation Costs – Enterprise Edition Customer Care Bill</u> Analysis: \$25,000

Approximately 16 - 18 weeks of on-site consulting and training by software vendor consisting of the following tasks:

- Requirements Definition
- Data Acquisition and Utilization Review
- Install and Configure Bill Analysis Solution
- Prototype Bill Analysis Modeling
- Training
- Bill Analysis Acceptance
- Bill Analysis Project Management

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Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 17

Witness: Butch Cockerill

- Q-17. Please reference Exhibit SLC-1. Under the description "Annual Maintenance", provide a detailed explanation as to what this includes for each item.
- A-17. Annual Maintenance MV90-PBS: \$25,000
 - Product Enhancements released every 12 15 months by vendor.
 - Patches issued by vendor as needed for critical issues.
 - Support provided from vendor's Raleigh, North Carolina support center via telephone and internet during the hours of 7:00 AM 8:00 PM (EST) Monday Friday.
 - 12 support center analysts certified on industry "gold standard" technical problem resolution methodology.

Annual Maintenance – Enterprise Edition Customer Care Bill Analysis: \$10,175

• See maintenance descriptions for MV90-PBS, above. Explanations are the same for both products.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 18

Witness: Butch Cockerill

- Q-18. Please reference Exhibit SLC-1. Under the description "Hours to develop any interfaces", provide a detailed explanation as to what this includes for each item.
- A-18. Hours to Develop any interfaces into and out of MV-PBS and Enterprise Edition Customer Care Bill Analysis to LG&E and KU CIS: \$121,600
 - Obtain RTP prices
 - Develop interface to get RTP prices from either an RTP link on the CSS website or some other predetermined location and load those RTP prices into PBS.

OR

- O Develop External Data Module (EDM) to accomplish this task.
- Develop interface to create a flat file containing summary invoice information from PBS and send it to our Bill Print (DOC1) process to produce the customer bill.
- Develop interface to create a flat file containing summary revenue information from PBS and send it to our CIS system for Revenue Accounting purposes.

<u>Hours to Develop any interfaces into and out of MV-PBS and Enterprise Edition</u> <u>Customer Care Bill Analysis to SAP: \$81,396</u>

- Obtain RTP prices
 - O Modify interface developed earlier to get RTP prices from either an RTP link on the CSS website or some other predetermined location and load those RTP prices into PBS. At this time, cannot identify exactly what those modifications might include, due to unfamiliarity with SAP.

OR

- o Modify External Data Module (EDM) created earlier for CIS to accomplish this task. At this time, cannot identify exactly what those modifications might include, due to unfamiliarity with SAP.
- Modify Bill Print interface created earlier containing summary invoice information from PBS and send it to SAP to be passed on to Bill Print (DOC1) to produce the customer bill.

• Modify CIS interface created earlier containing summary revenue information from PBS and send it to the SAP Revenue Accounting module.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 19

Witness: Butch Cockerill

- Q-19. Please reference Exhibit SLC-1. Under the description "Capital Cost to set up database server", provide a detailed explanation as to what this includes.
- A-19. Capital Cost to set up server MV-PBS: \$10,000
 - Purchase MV-PBS server, Windows operating system license, database license \$9,000.
 - Computer Architecture labor to build and set up MV-PBS server \$1,000.

<u>Capital Cost to set up server – Enterprise Edition Customer Care Bill Analysis:</u> \$10,000

- Purchase Customer Care Bill Analysis server, Windows operating system license, database license \$9,000.
- Computer Architecture labor to build and set up Customer Care Bill Analysis server \$1,000.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 20

Witness: Butch Cockerill

- Q-20. Please reference Exhibit SLC-1. Under the description "Server Maintenance/Support", provide a detailed explanation as to what this includes.
- A-20. Server Maintenance / Support MV-PBS: \$1,000 / yr.
 - Apply patches. This is a monthly task.
 - 24X7 on call support for incidents that occur. Ex: server goes down and associated applications stop working
 - Daily, weekly, monthly backup scheduling and 24X7 backup support.
 - Initial server build and installation.
 - Labor for server retirement tasks.
 - Disaster recovery testing.

<u>Server Maintenance / Support - Enterprise Edition Customer Care Bill Analysis:</u> \$1,000 / yr.

• See server maintenance bullets above.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 21

Witness: Butch Cockerill

- Q-21. Please reference Exhibit SLC- 1. Under the description "Cost to calculate advance pricing and notify customers", provide a detailed explanation as to what this includes.
- A-21. Basis for this price is for programming and providing hands on training associated with the Energy Management System (EMS) unit commitment program (UC) by the vendors, Open System International, Inc. (OSI), engineers on site. The EMS UC will be used to model projected generation dispatch on a day-ahead basis to determine greatest hourly generation supply cost per hour.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 22

Witness: Butch Cockerill

Q-22. Please reference Exhibit SLC-1. Under the description "Web-Site to Post Price Notifications", provide a detailed explanation as to what this includes.

A-22. Web Site to Post Price Notifications: \$15,000

- Three new web pages will be developed within the Customer Self Serve (CSS) secured website. One will be the Real Time Pricing (RTP) homepage, one will be the RTP current day prices, and one will be the RTP next day prices.
- Security will be handled by the current CSS security process.
- New database objects will be created to enter, update, retrieve and store one day's worth of prices.
- A new batch application will be created to pick up and load the pricing data file into our existing BillPrint database. Each day at a pre-defined time, this batch application will pick up only the file containing the next day's prices. The new prices can be posted to the website at any time thereafter, as well as continue to display the current day's prices.
- The CSS website will be updated to recognize RTP participants and disable any CSS features that are not needed for RTP participation. Links will be added to the new RTP web page.



Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 23

- Q-23. Please reference Exhibit SLC-1. Under the description "Program Communication for customers", provide a detailed explanation as to what this includes.
- A-23. The amount specified is to provide for the direct mailing of a letter and brochure to eligible customers. Primary means of communication to the target audience will be through Major Account representatives who will receive brochures and talking points to disseminate to their respective customers.



Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 24

- Q-24. Please reference Exhibit SLC-1. Under the description "Customer Contact Effort", these charges are listed as zero cost to the program. Does the company intend to waive any costs to the pilot for services rendered under this item?
- A-24. There are no anticipated additional costs associated with the "Customer Contact Effort" as all aspects of marketing and contracts will be handled by existing account managers during the normal course of business.

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Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 25

- Q-25. Please reference Exhibit SLC-1. Under the description "MV90 translation time, Customer Accounting bill validation. Assume 1/4 FTE", provide a detailed explanation as to what this includes.
- A-25. Initially accounts will be set up in our MV90 system and in an interface system that will be used to calculate the bills. The customer's meter will be called automatically on a daily basis. Customer Accounting will verify the integrity of the data daily by reviewing the following information: time on the meter (recorder) as compared to system time, energy from pulse data (MV90 data) as compared to encoded meter reading from the register (taken electronically), and if the MV90 system accepts or rejects the data. If a problem is found (such as meter won't answer or if data is rejected), Customer Accounting will manually attempt to call meter. If this attempt fails, Customer Accounting will notify a Meter Tech to visit customer premise to determine the problem. Customer Accounting will continue to work with Meter Tech until problem is resolved. Once data is verified in MV90, Customer Accounting will initiate a transfer to the interface system for bill calculation. When bill calculation is complete, Customer Accounting will review the bill for exceptions (high/low usage of kWh and kW; revenue calculations in line with prior history on the account; power factor; etc.). Customer Accounting will also review supporting bill documentation for any abnormalities in customer usage. After the bill is reviewed, it will be released for printing. Supporting bill documentation will be printed and mailed or emailed to the customer.

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Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 26

- Q-26. Please reference Exhibit SLC-1. Under the description "Report balancing & system auditing", provide a detailed explanation as to what this includes.
- A-26. Report balancing and system auditing involves comparing daily CIS reports to the data from the outside vendor to ensure that the customer usage record is complete and accurate.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 27

- Q-27. Please reference the Application, Cockerill Testimony, page 2, line 3. Does the company have information as to the number of meters required under the pilot program? Does the company have information for the number of communication boards required under the pilot program?
- A-27. Until customers are signed up for the pilot program, the Companies will not know specific metering and communication requirements.

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 28

- Q-28. Please reference Exhibit SLC-1. Under the description "Meter Troubleshooting", there is a failure rate of 10% specified. Provide a detailed explanation as to how this failure rate was determined. Was this failure rate based on historical data? Is this failure rate acceptable to the company for this product? Are there other products which may be used that have lower failure rates?
- A-28. The annual meter failure rates are less than 1%. The estimated failure rate reflected in Exhibit SLC-1 factors in other anomalies and issues requiring a field visit such as meter re-read, lost communication investigation, response to meter display codes, demand resets, tampering, vandalism, and high/low bill investigations.

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Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

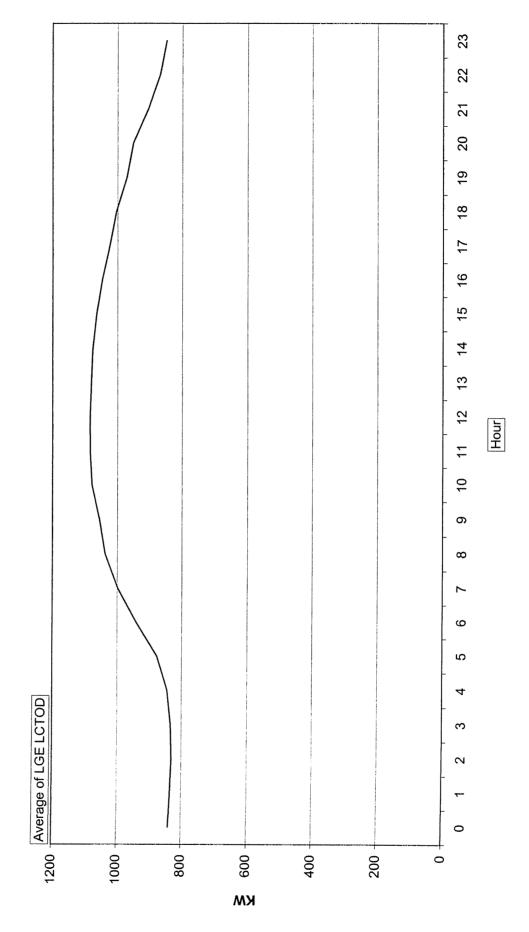
Case No. 2007-00161

Question No. 29

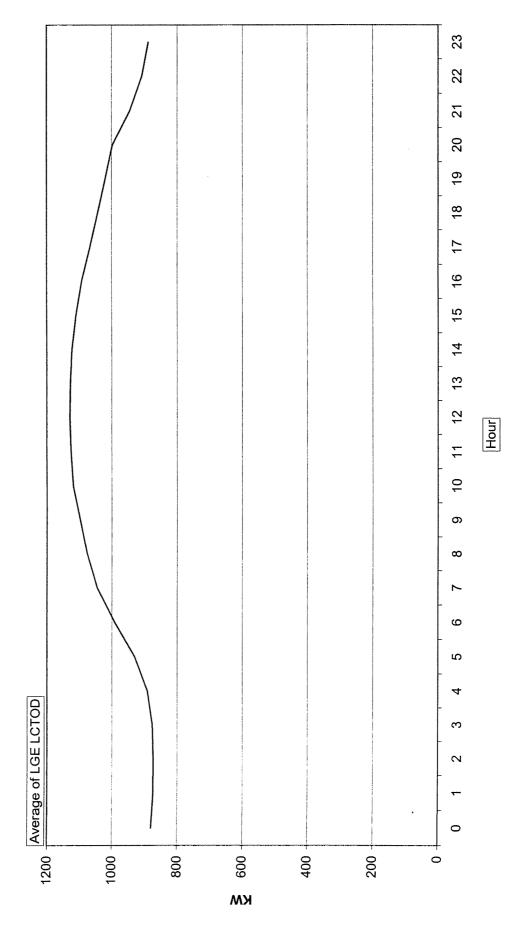
Witness: Kent W. Blake

- Q-29. Please provide a graph, for each month of the year, demonstrating the average daily usage on the hour for all 24 hours under each of the LG&E rates LC-TOD, LP-TOD, and LI-TOD and KU rates LCI-TOD, LMP-TOD, and LI-TOD. (This should be interpreted to mean that each graph will depict the average for all days of that month and normalized over a 30 year period.)
- A-29. Please see the attached. The Companies do not have hourly daily usage data on a normalized basis.

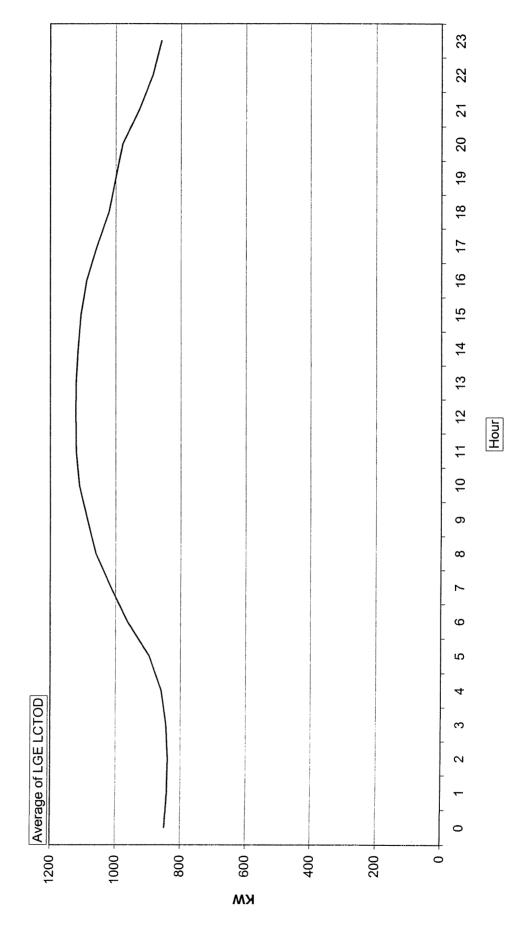
LOUISVILLE GAS AND ELECTRIC COMPANY LC-TOD January 2006



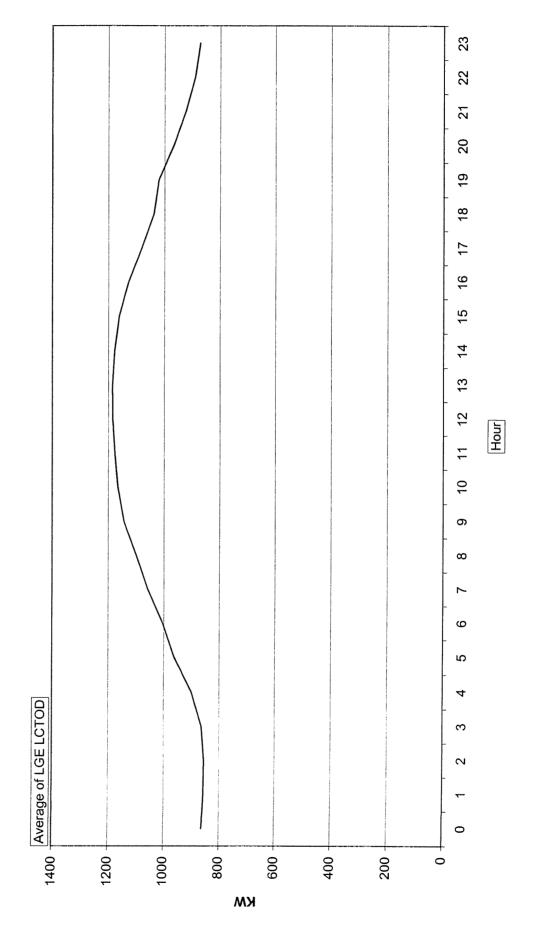
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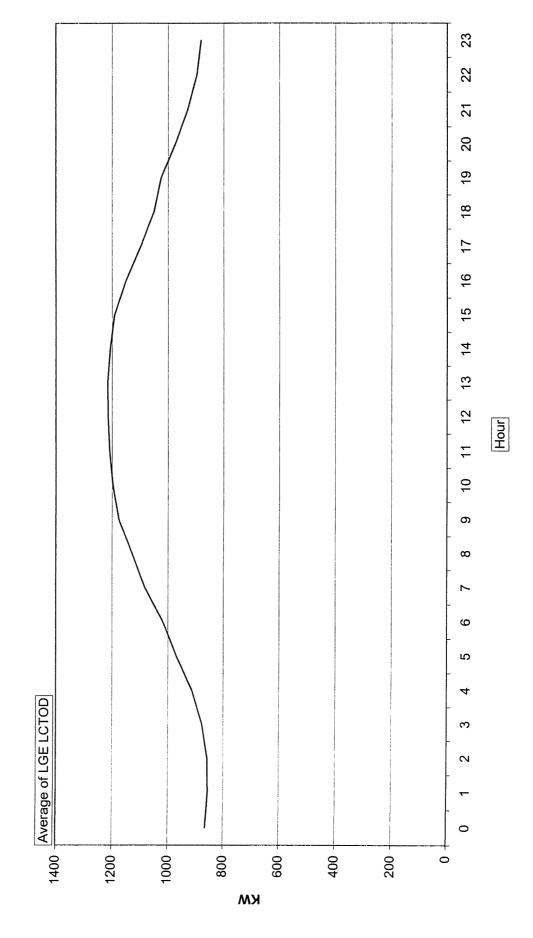
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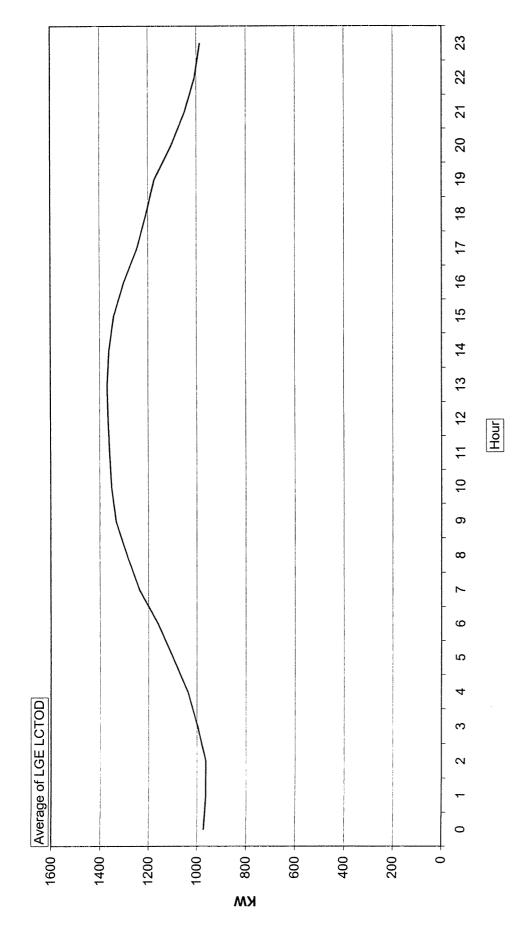
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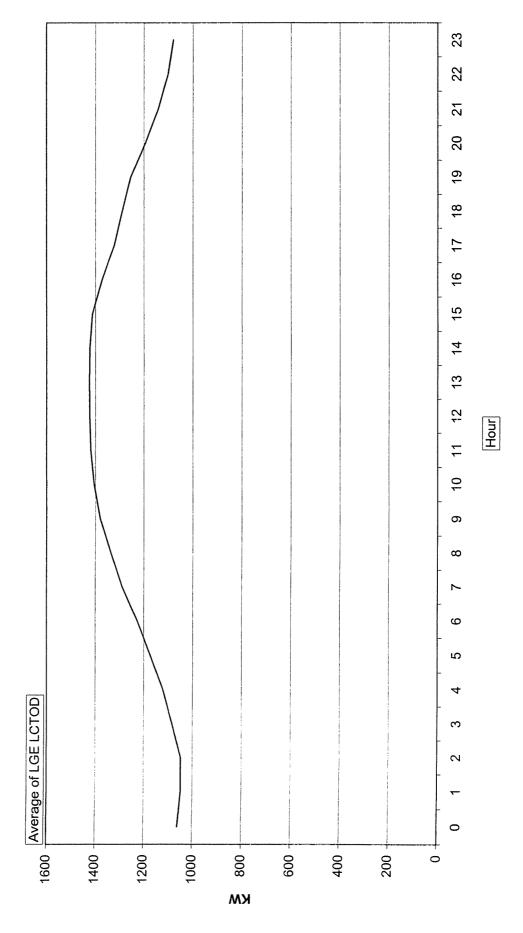
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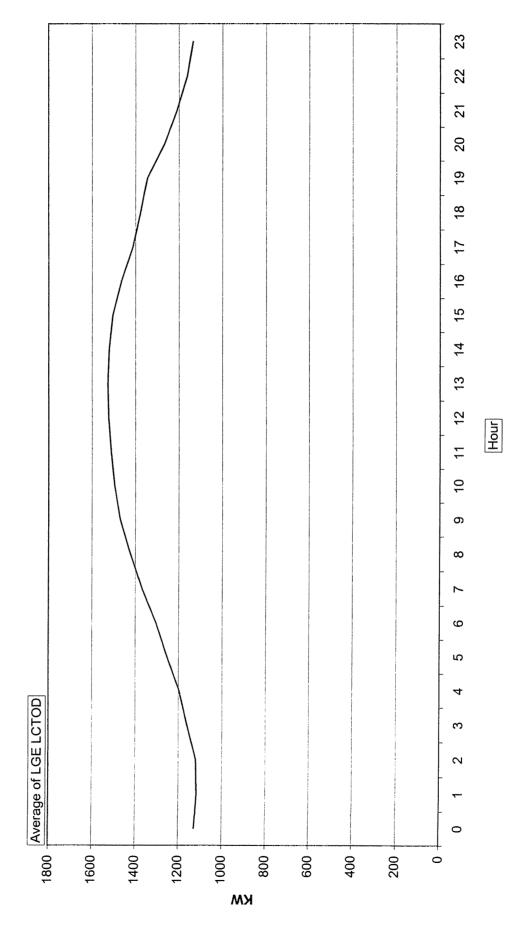
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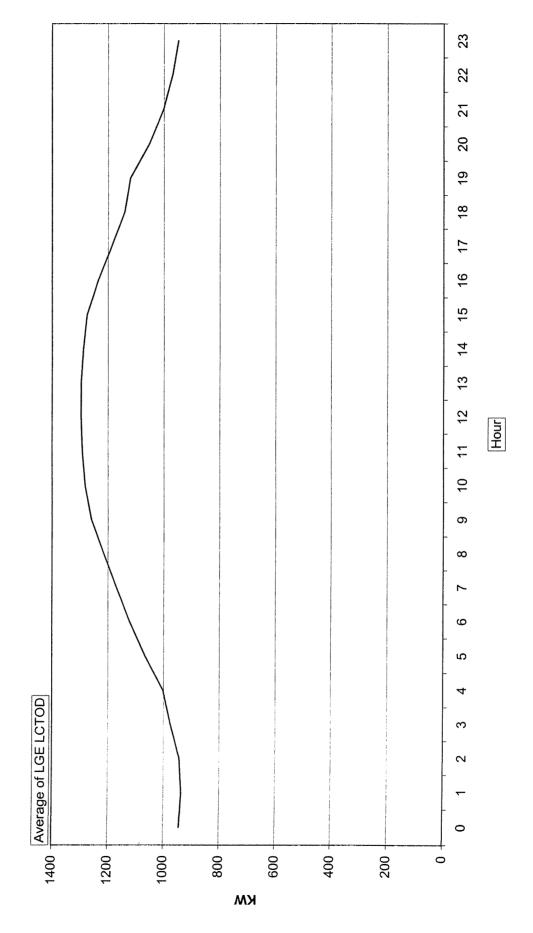
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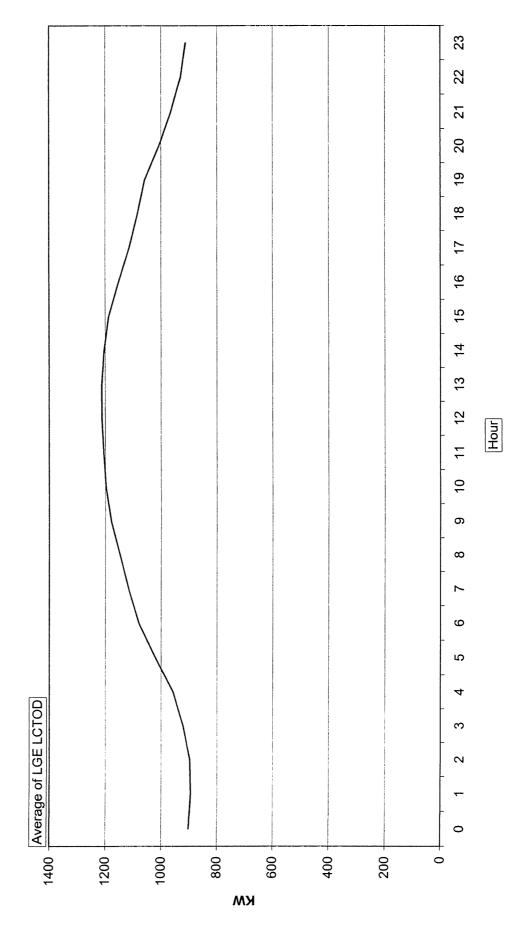
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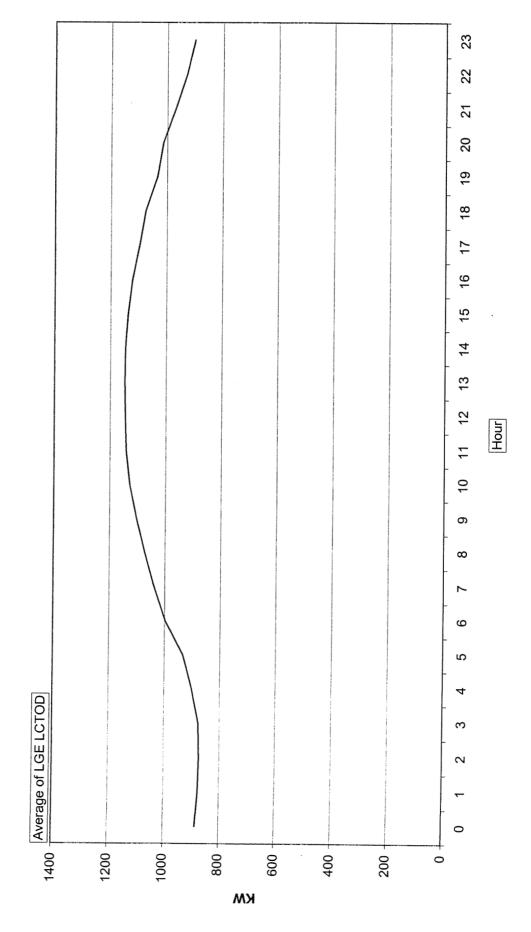
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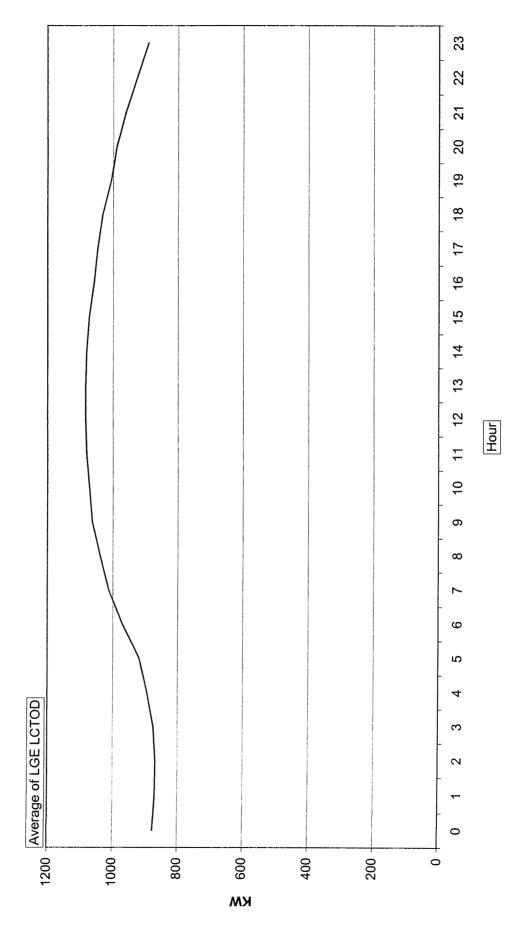
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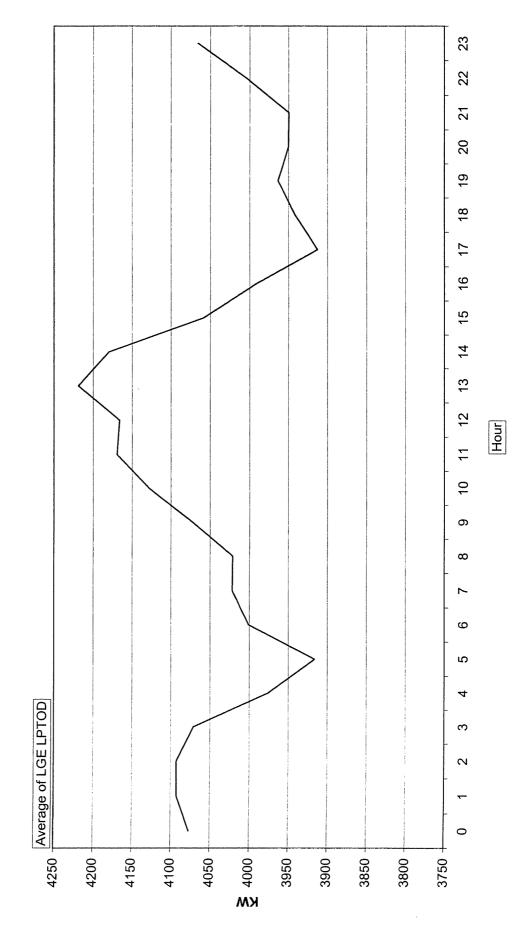
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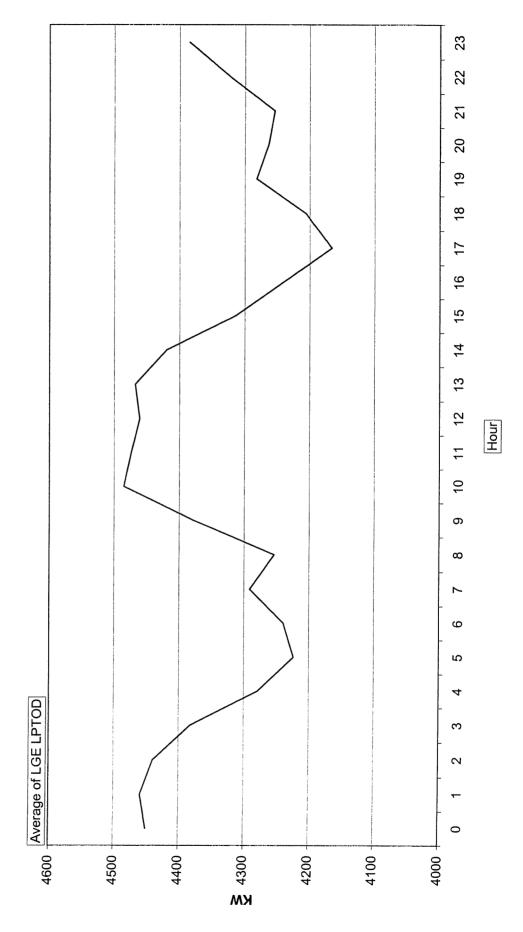
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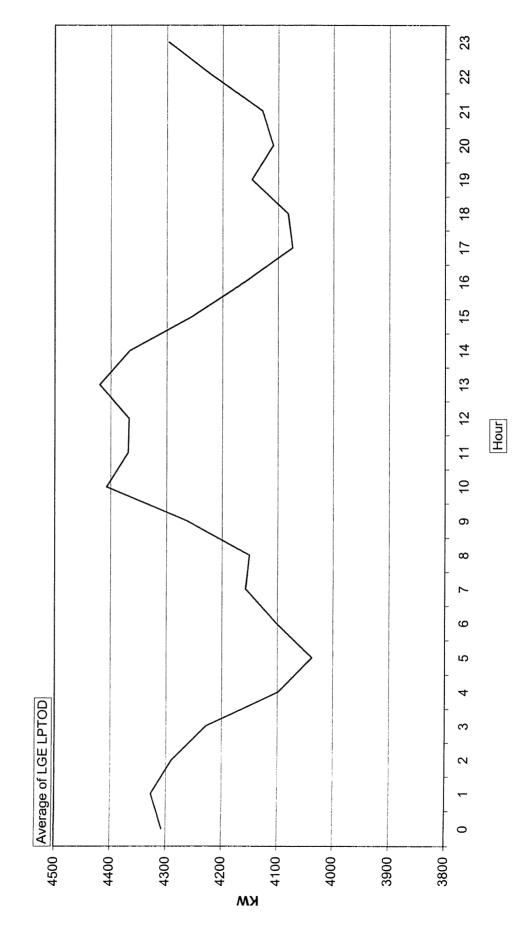
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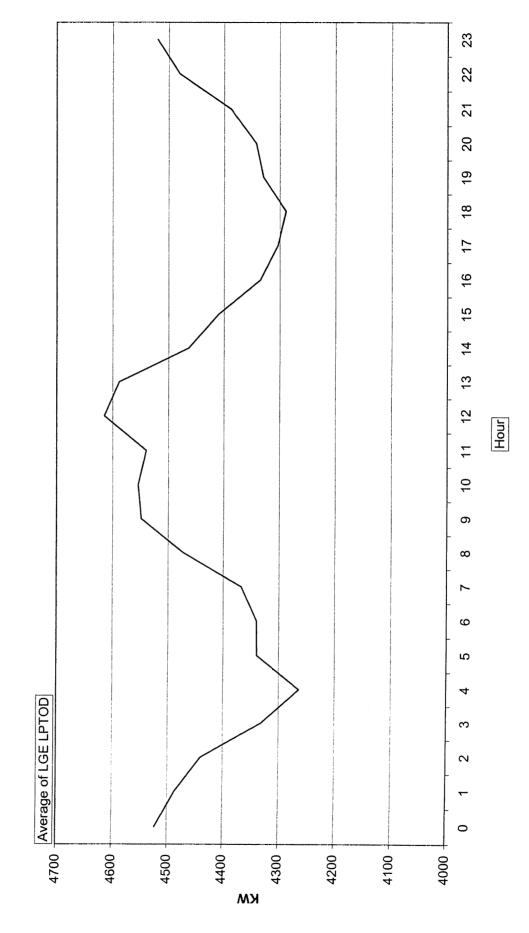
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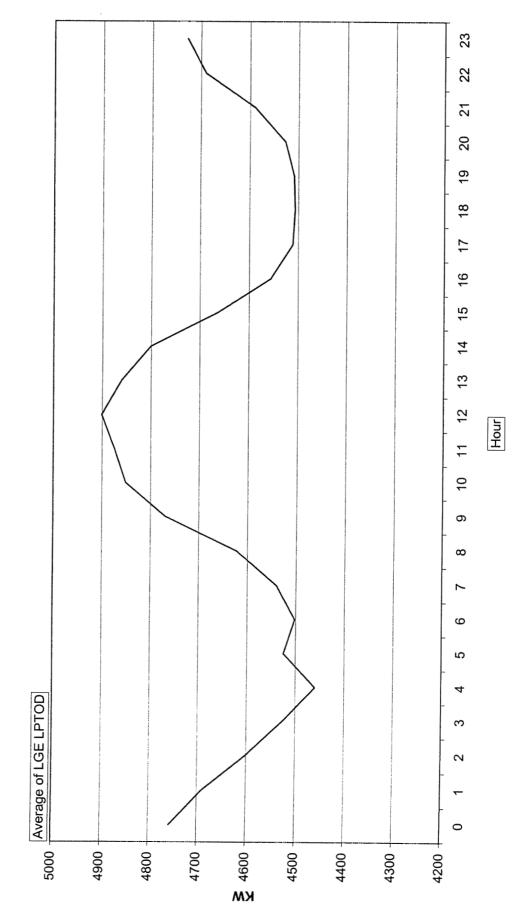
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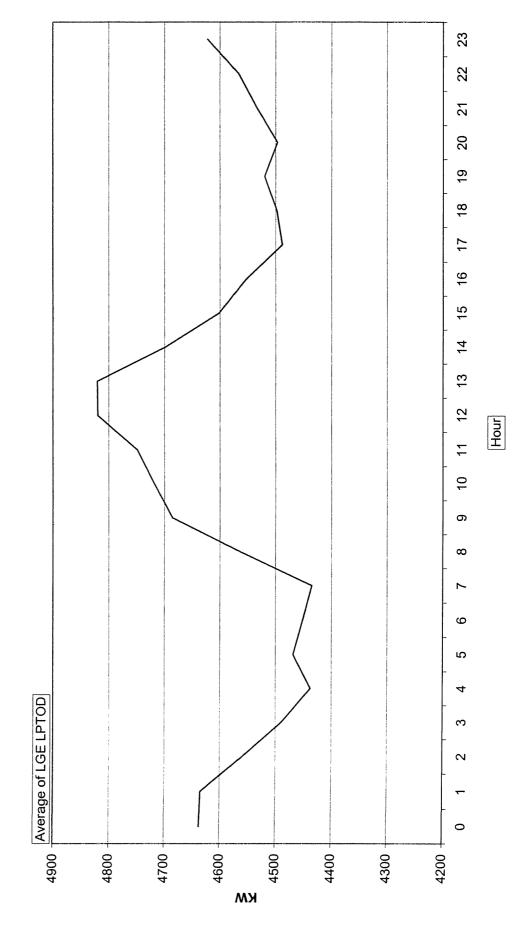
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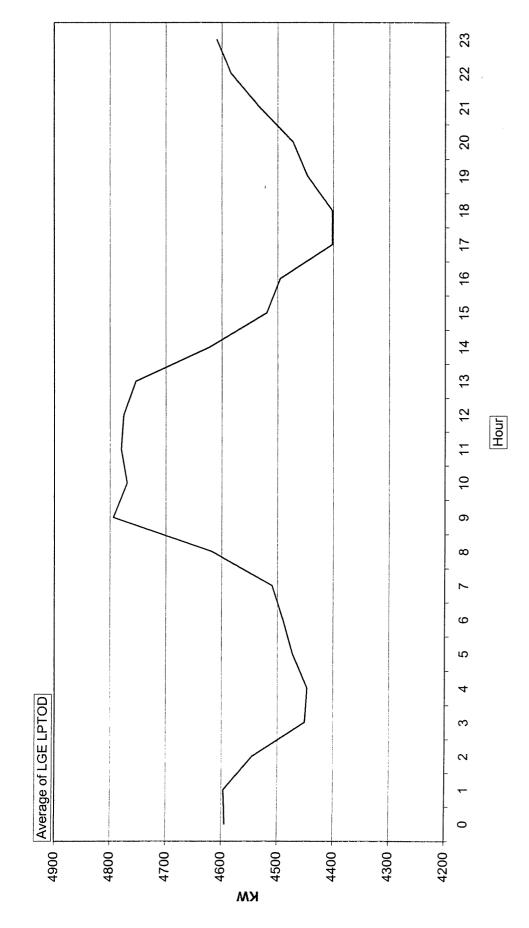
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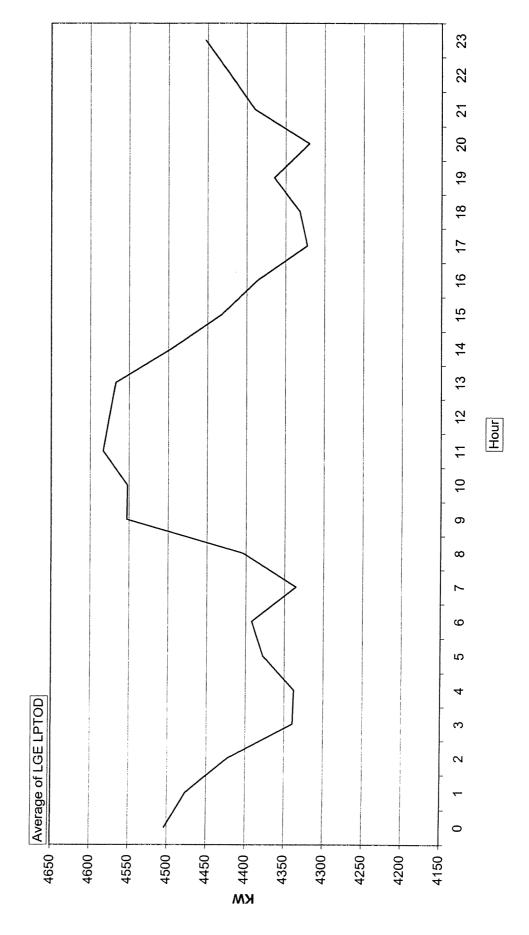
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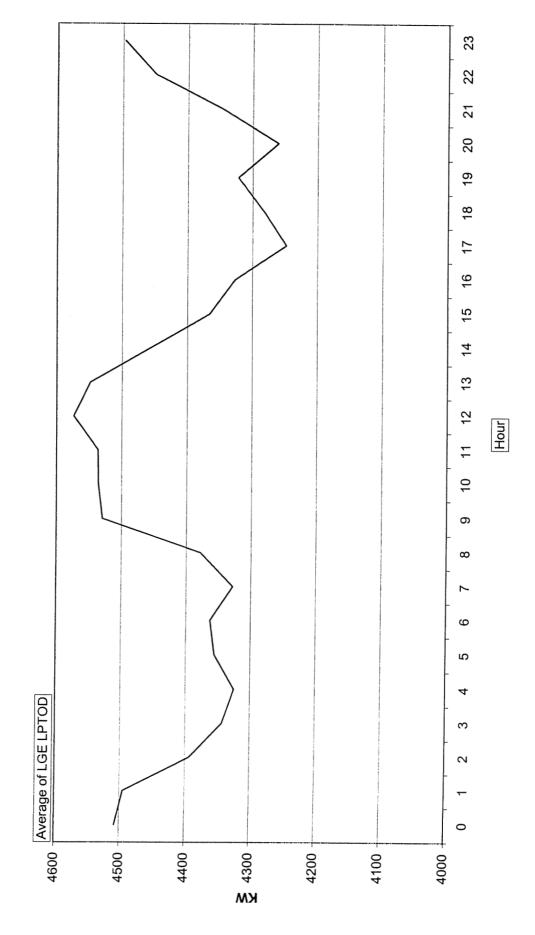
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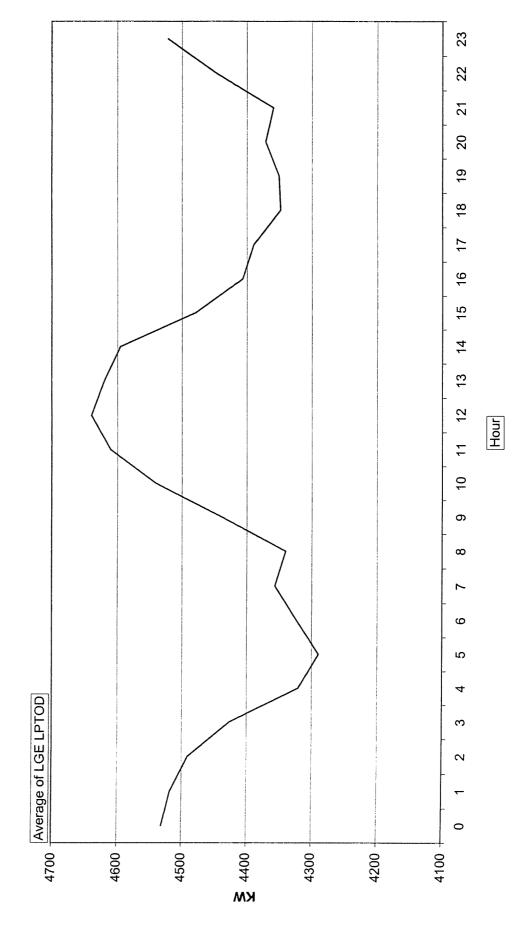
LOUISVILLE GAS AND ELECTRIC COMPANY LP-TOD
September 2006



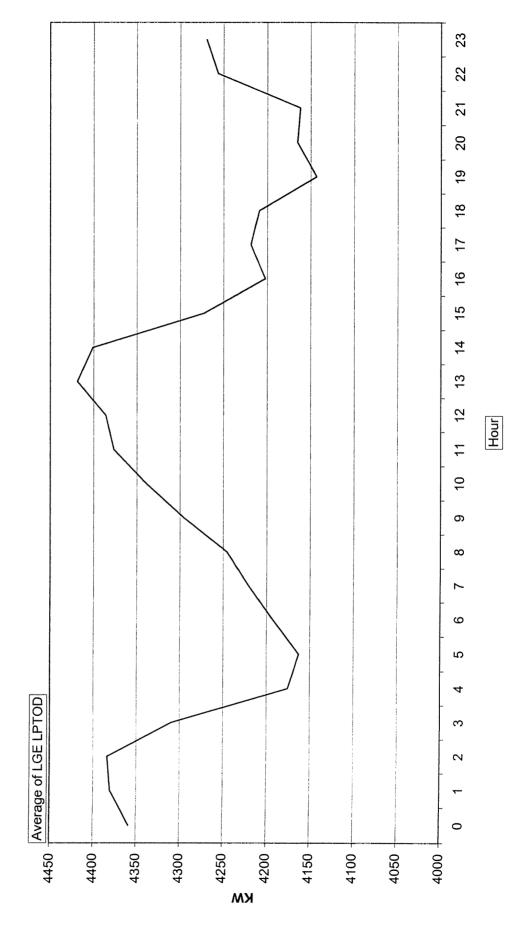
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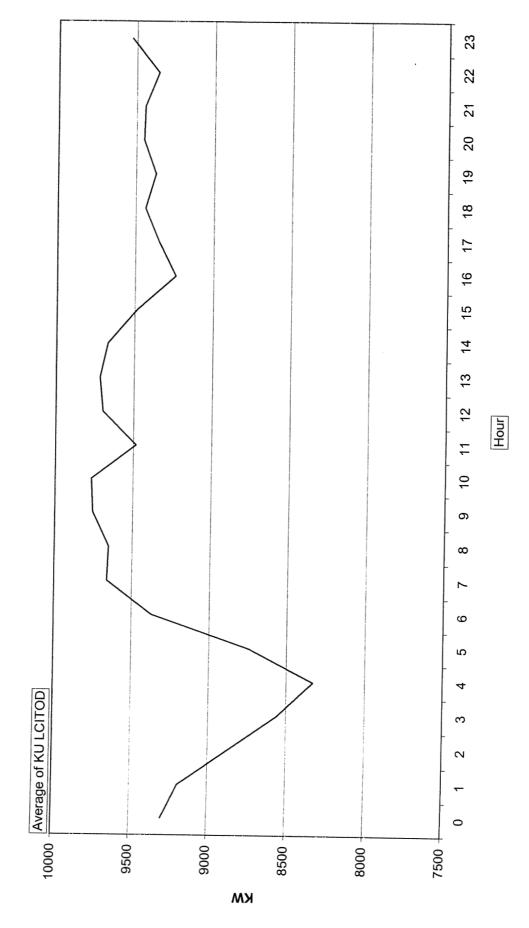
LOUISVILLE GAS AND ELECTRIC COMPANY LP-TOD
November 2006



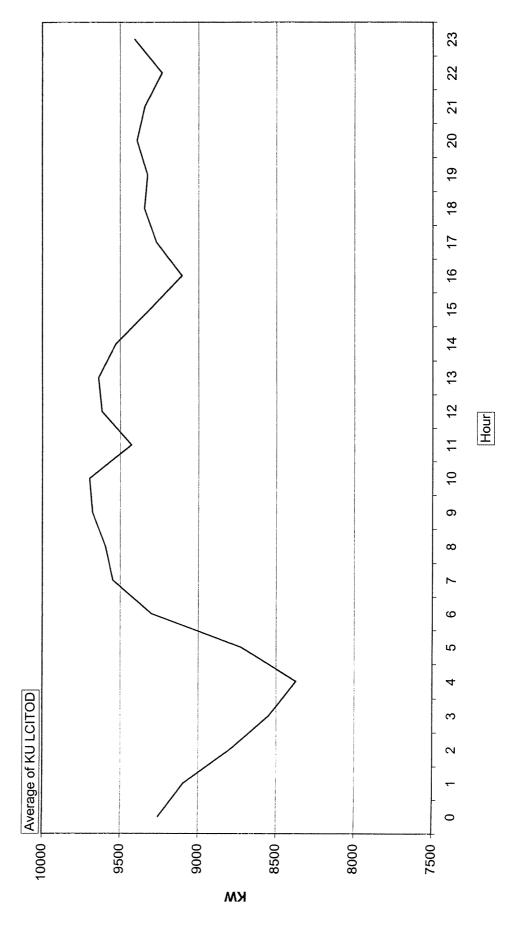
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December 2006



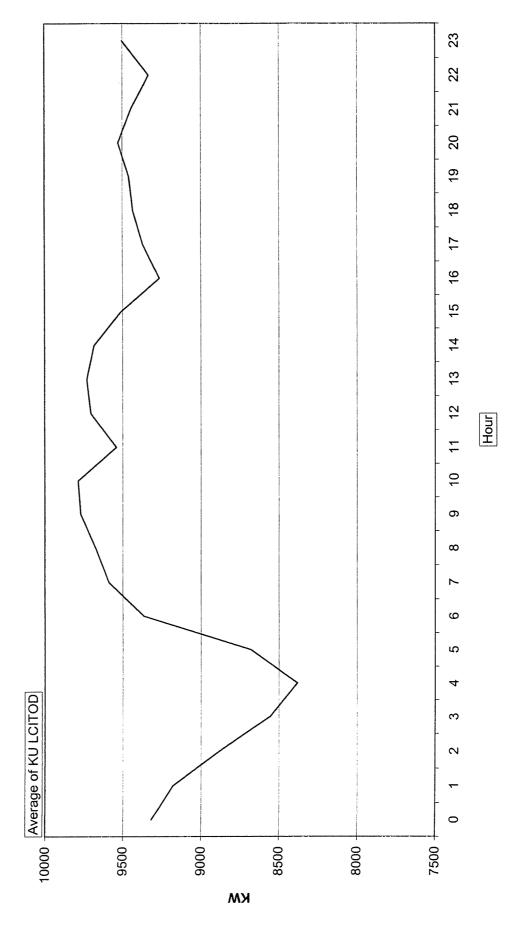
KENTUCKY UTILITIES COMPANY LCI-TOD January 2006



KENTUCKY UTILITIES COMPANY LCI-TOD February 2006



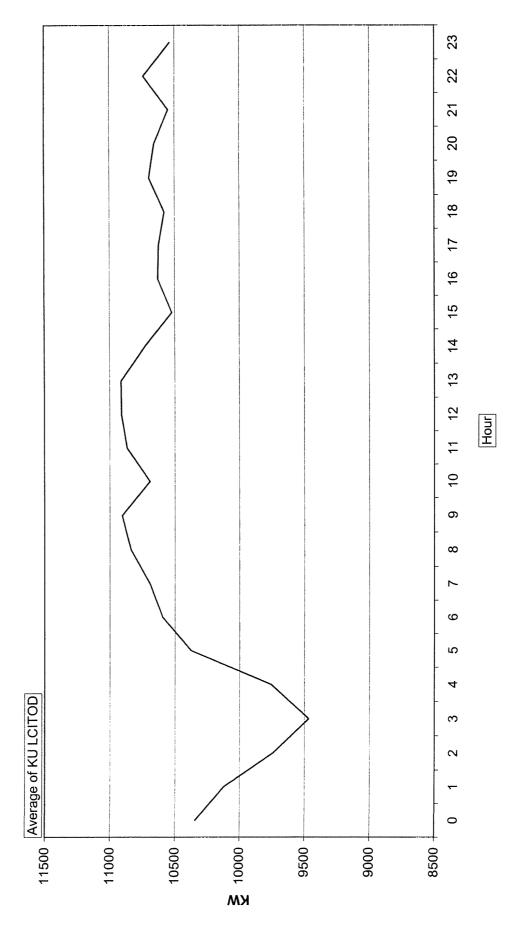
KENTUCKY UTILITIES COMPANY LCI-TOD March 2006



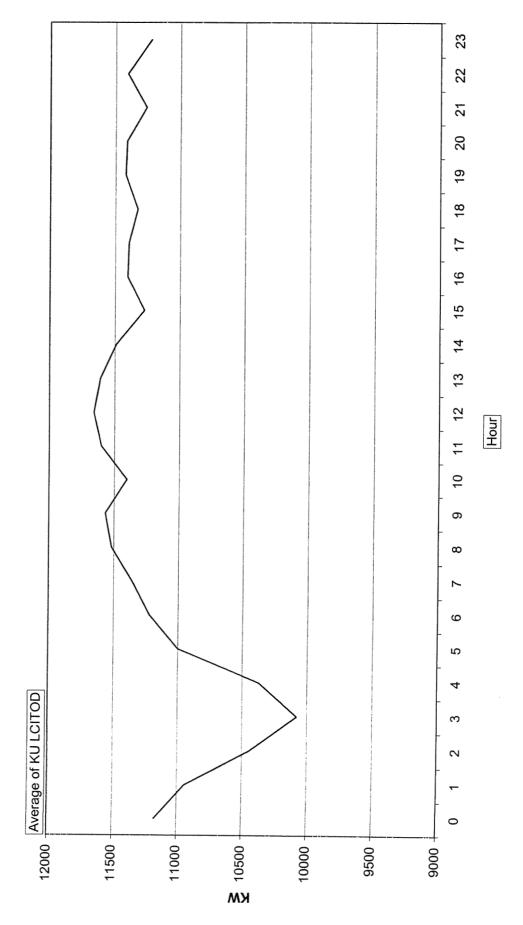
KENTUCKY UTILITIES COMPANY LCI-TOD April 2006



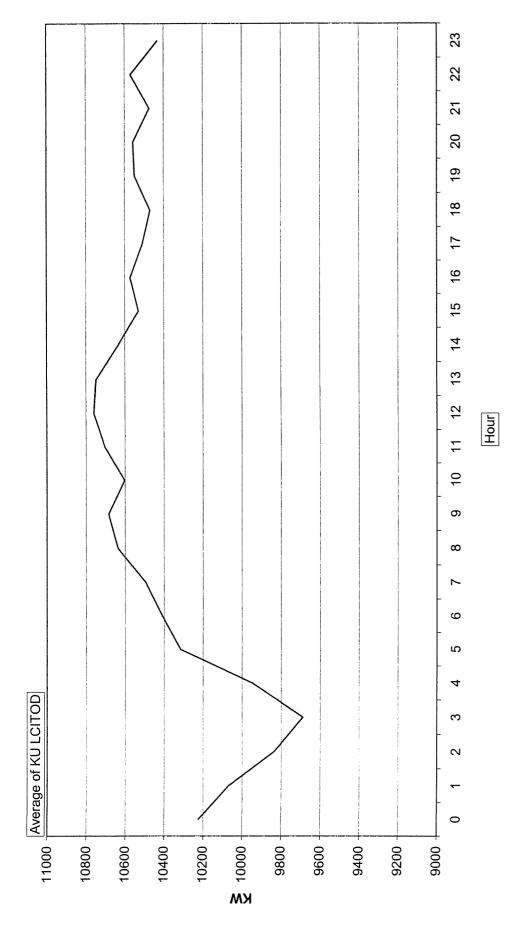
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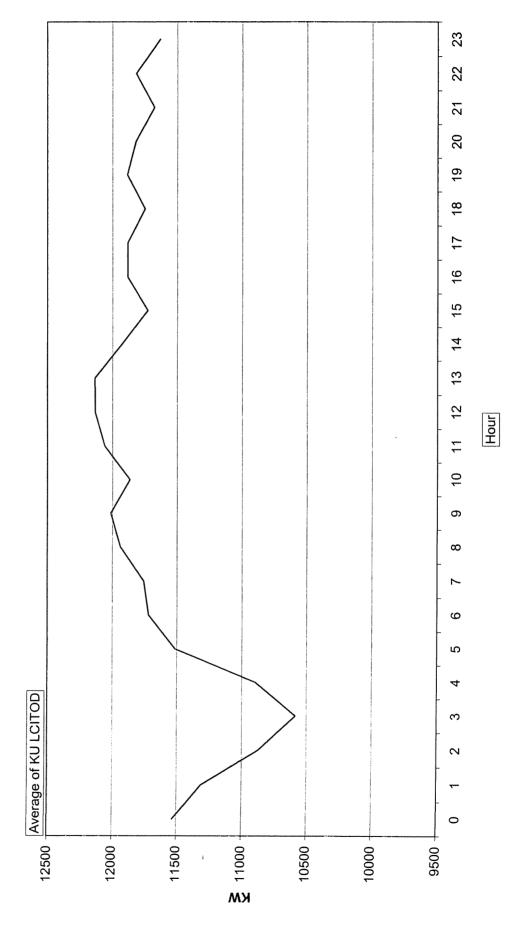
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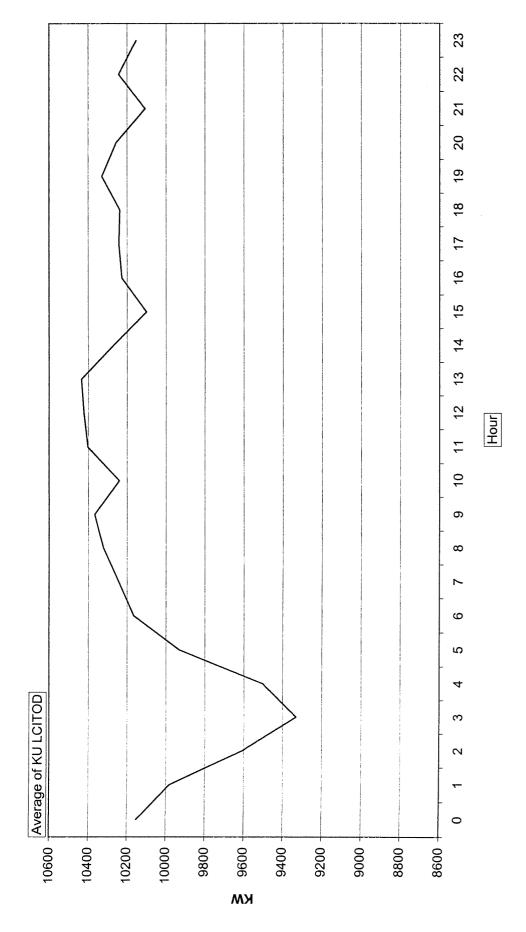
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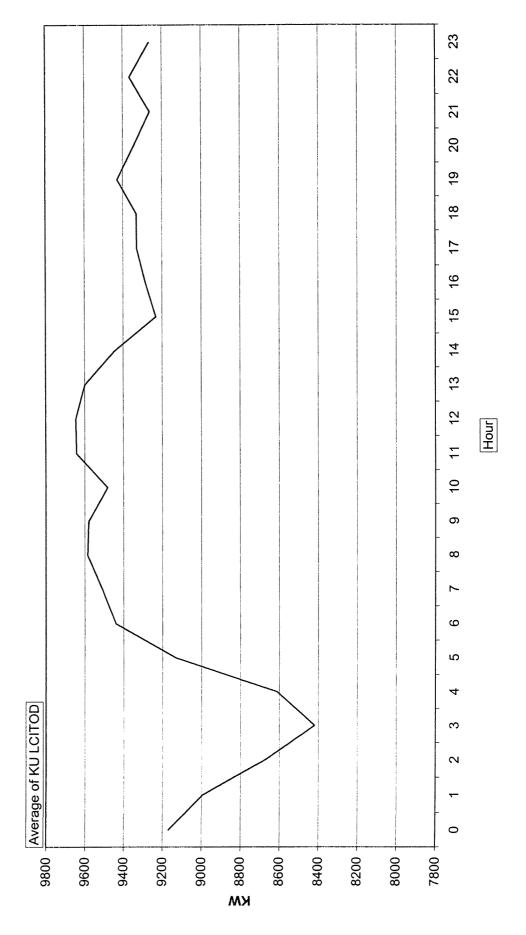
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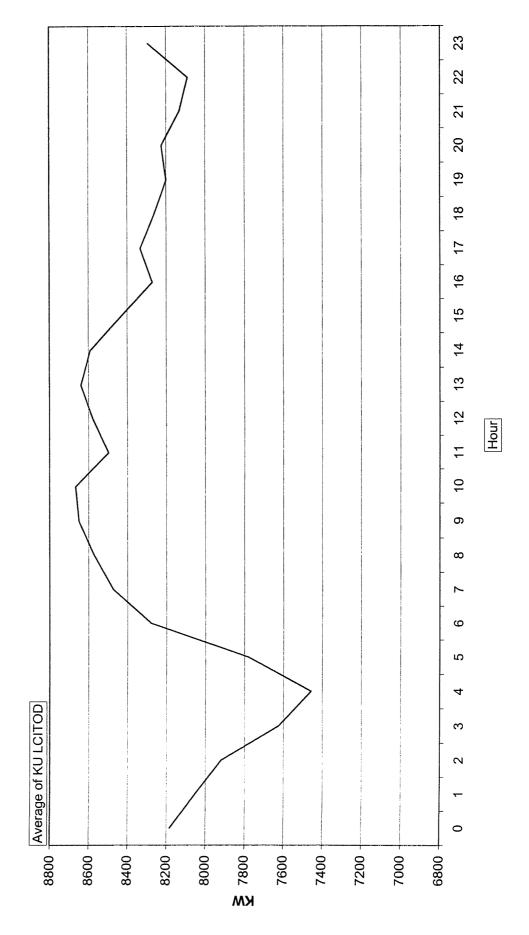
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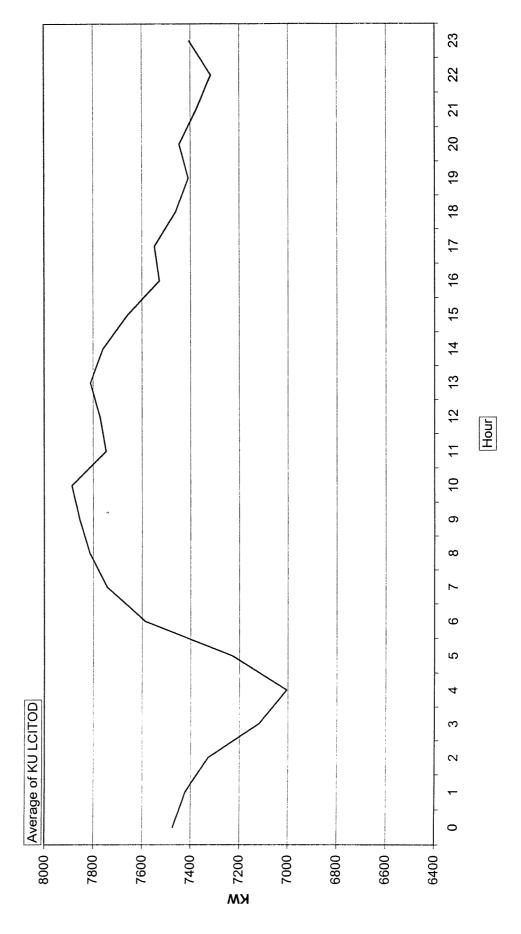
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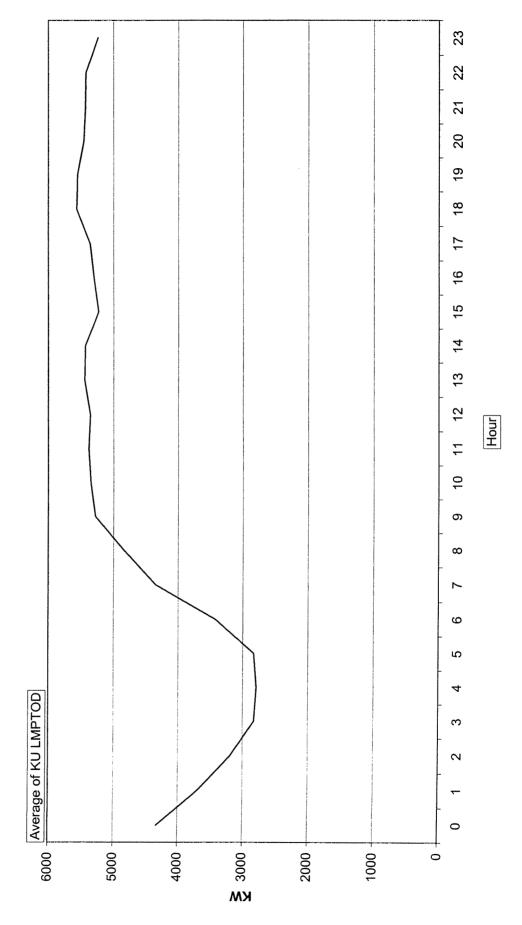
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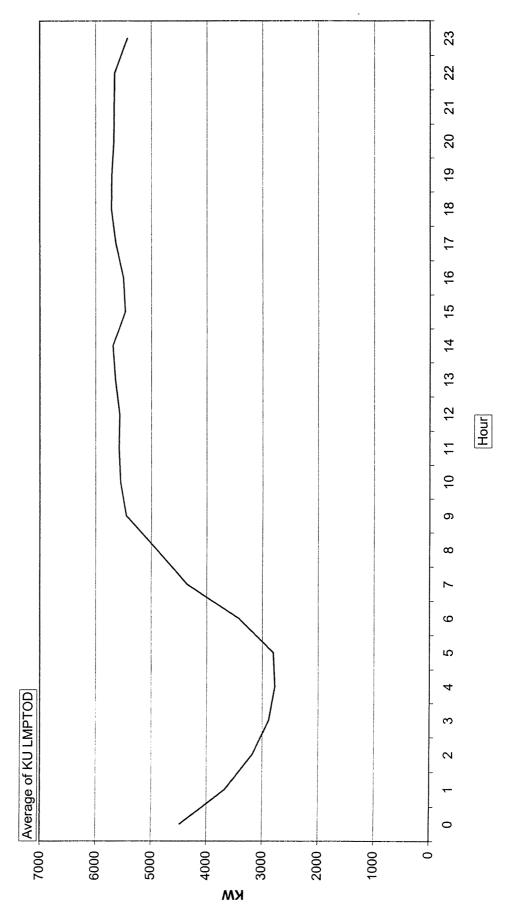
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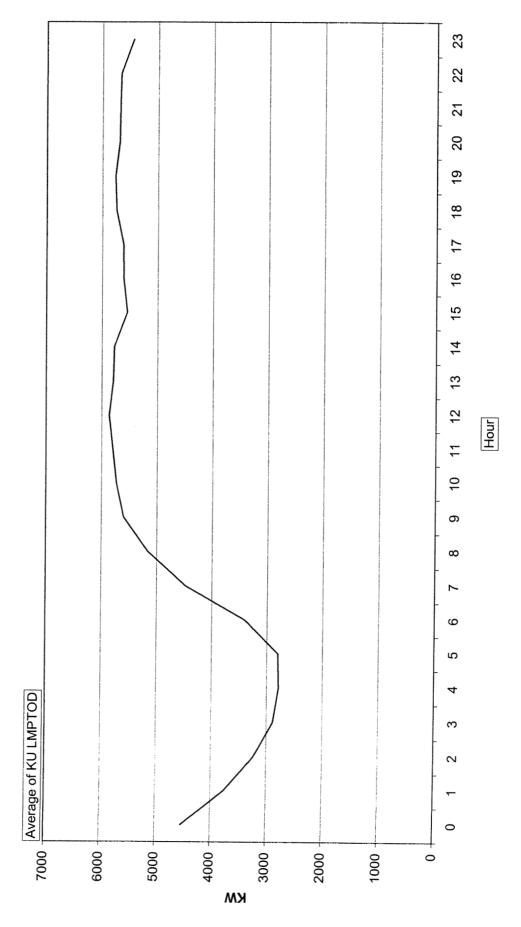
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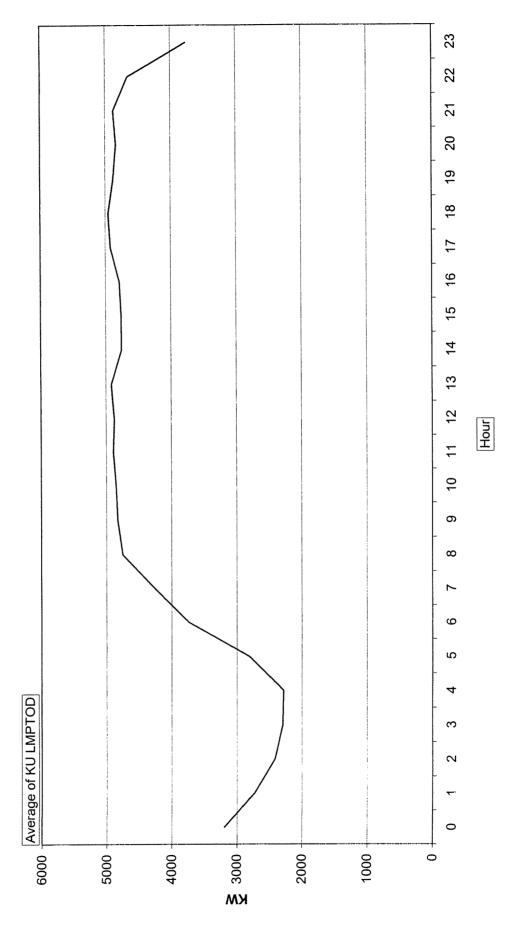
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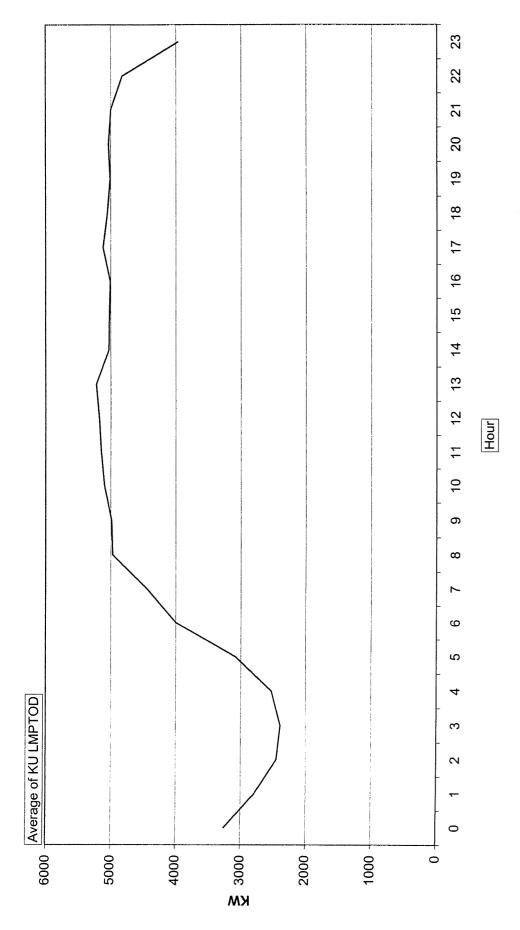
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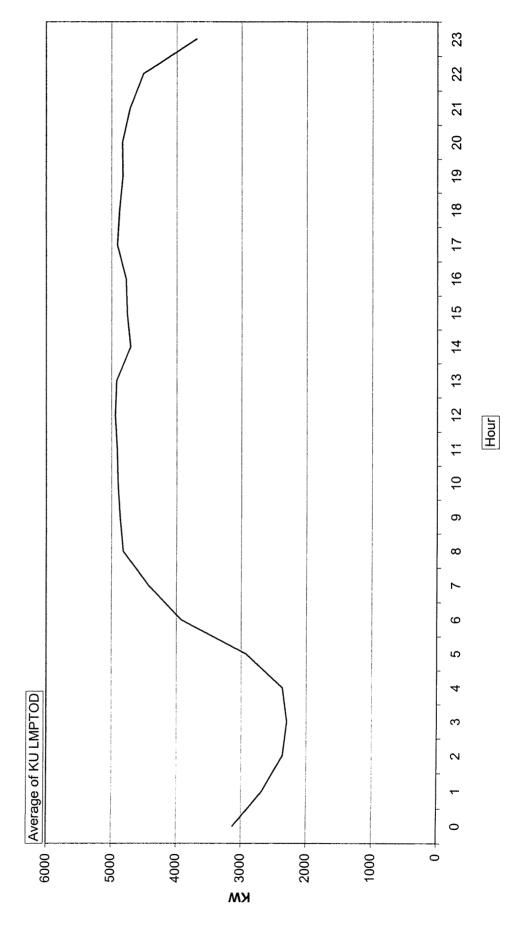
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KENTUCKY UTILITIES COMPANY LMP-TOD May 2006



KENTUCKY UTILITIES COMPANY LMP-TOD June 2006

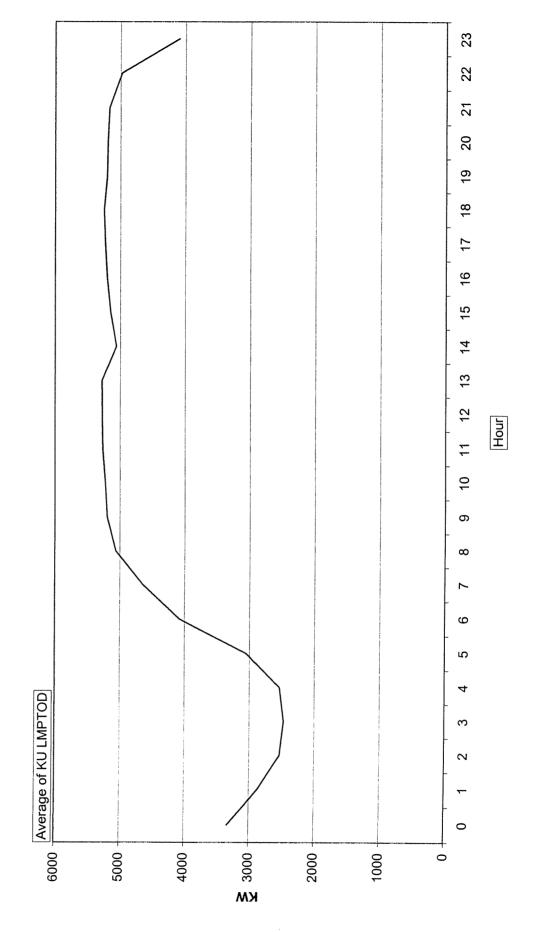


Hour LMP-TOD July 2006 ∞ Average of KU LMPTOD က ΚM

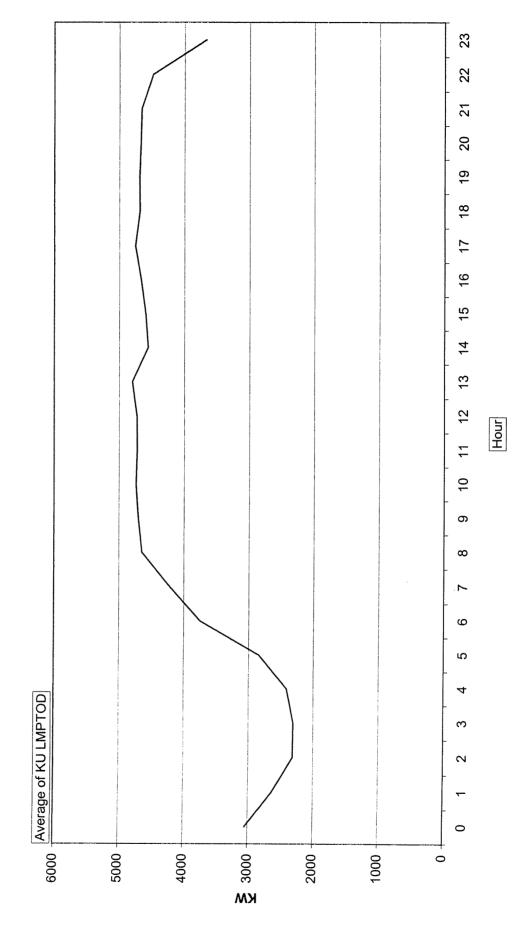
Month 7

KENTUCKY UTILITIES COMPANY

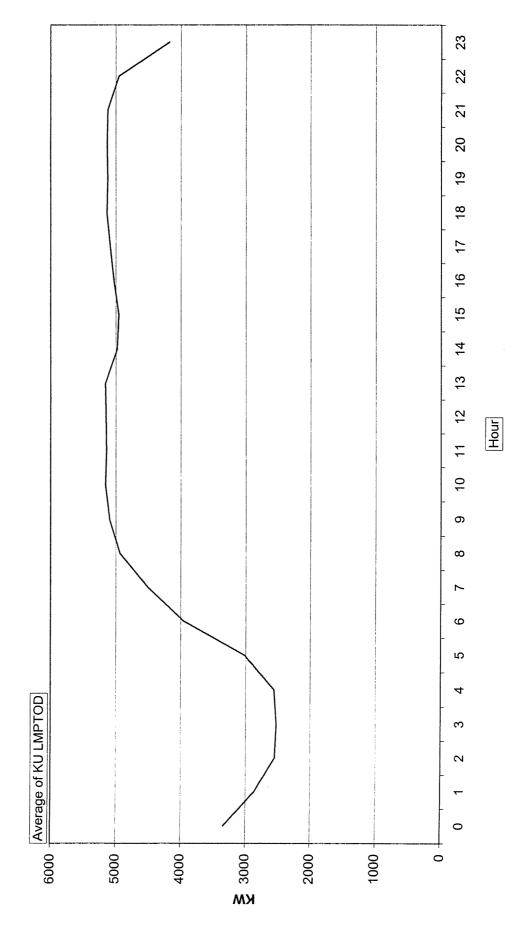
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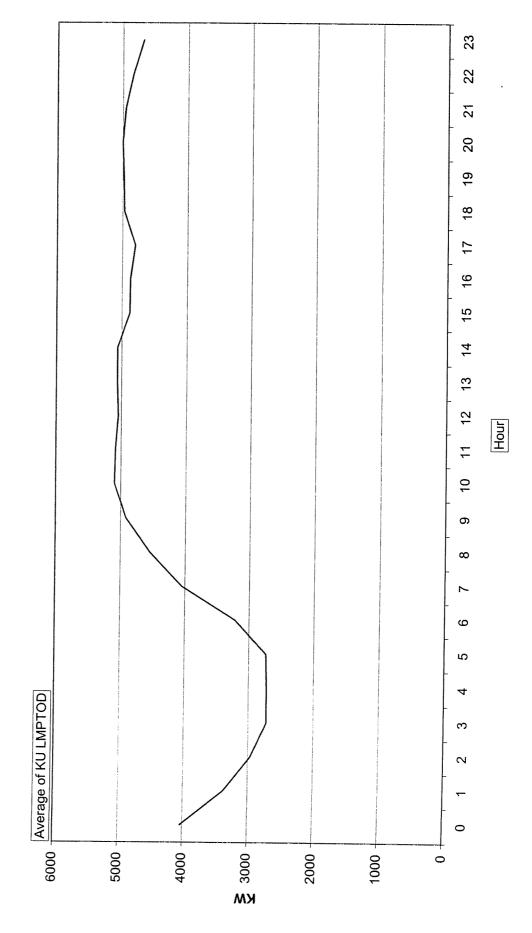
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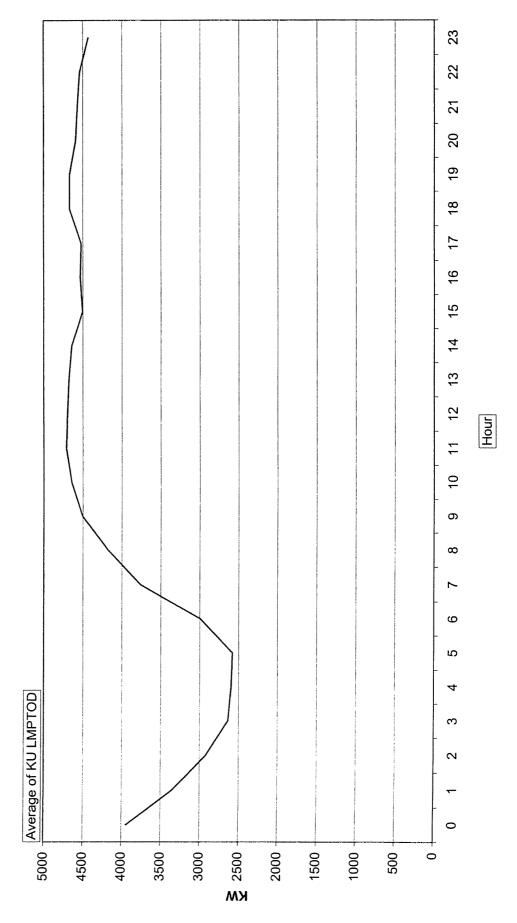
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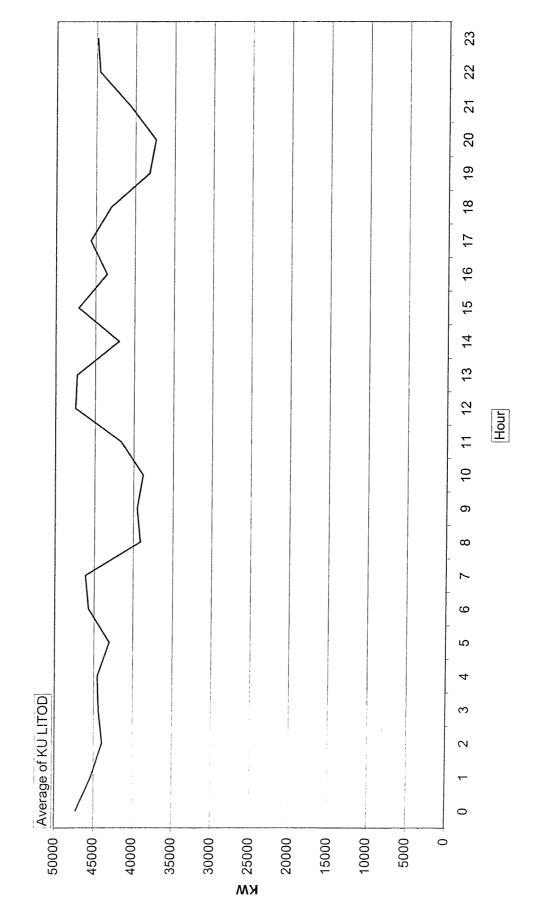
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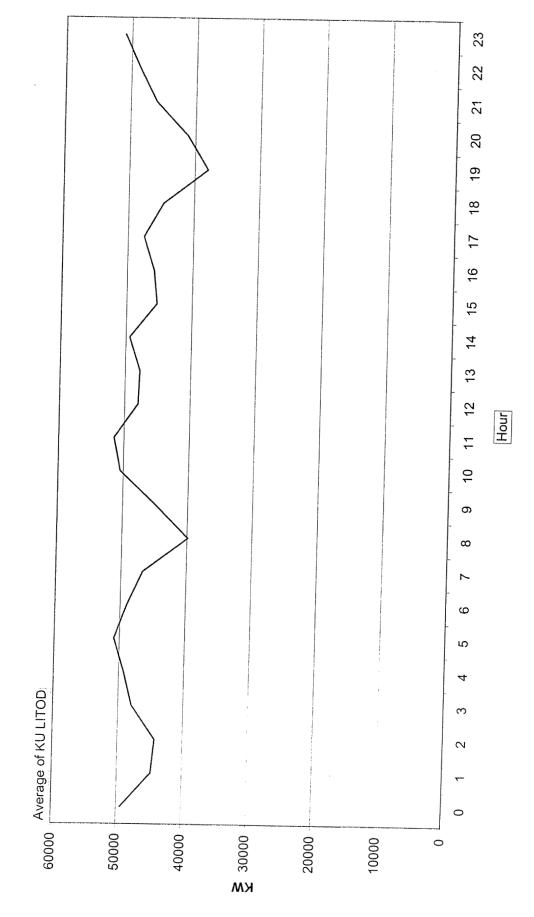
KENTUCKY UTILITIES COMPANY LMP-TOD December 2006



KENTUCKY UTILITIES COMPANY LI-TOD January 2006



KENTUCKY UTILITIES COMPANY LI-TOD February 2006



Louisville Gas and Electric Company and Kentucky Utilities Company

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 30

Witness: Kent W. Blake

- Q-30. Please provide a graph, for each month of the year, demonstrating the projected change in the average daily usage on the hour for all 24 hours under each of the LG&E rates LC-TOD, LPTOD, and LI-TOD and KU rates LCI-TOD, LMP-TOD, and LI-TOD.
- A-30. The Companies do not yet possess the data upon which it could reasonably base a projection of the kind requested. This type of data will be obtained as a result of the pilot and utilized to determine the potential for implementing the RTP Pilot as a permanent standard rate schedule.

Louisville Gas and Electric Company and Kentucky Utilities Company

Response to the Request for Information Posed by the Attorney General Dated May 18, 2007

Case No. 2007-00161

Question No. 31

Witness: Kent W. Blake

- Q-31. What type of demand reduction does LG&E and/or KU hope to obtain from this program (i.e., reductions in peak demand, base demand, or both)? Which type of reduction is more important to LG&E and/or KU and why?
- A-31. The Companies do not yet possess the data requested concerning demand reduction. The purpose of the proposed RTP Pilot program is to gather data (such as the type requested in this question) to determine reductions in peak demand and reductions (and/or shifts) in usage and the associated costs and benefits to customers and the utility. The pilot results will help determine if it would be beneficial to implement the program as a permanent standard rate schedule.

Reductions in peak demand and reductions (and/or shifts) in usage are both important to customers and to the utility as they impact future needs for both peaking capacity and baseload generation.