

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

FEB 29 2008

**In the Matter of:**

PUBLIC SERVICE  
COMMISSION

THE ANNUAL COST RECOVERY FILING )  
FOR DEMAND SIDE MANAGEMENT BY ) CASE NO. 2007-00369  
DUKE ENERGY KENTUCKY, INC. )

**ATTORNEY GENERAL'S SUPPLEMENTAL  
REQUESTS FOR INFORMATION**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits his Supplemental Requests for Information to Duke Energy Kentucky, Inc., to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (4) If any request appears confusing, please request clarification directly from the Office of Attorney General.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

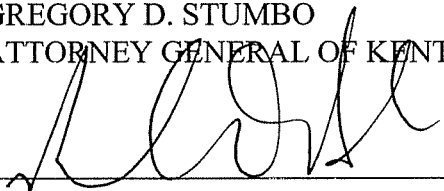
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis 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.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity 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 disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,

GREGORY D. STUMBO  
ATTORNEY GENERAL OF KENTUCKY



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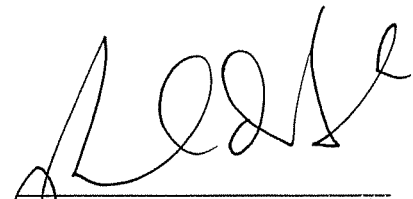
**CERTIFICATE OF SERVICE AND NOTICE OF FILING**

I hereby give notice that this the 29<sup>th</sup> day of February, 2008, I have filed the original and ten copies of the foregoing Attorney General's Motion to Intervene with the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

Honorable John J. Finnigan, Jr.  
Associate General Counsel  
Duke Energy Kentucky, Inc.  
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P.O. Box 960  
Cincinnati, OH 45201-0960

Florence W. Tandy  
Northern Kentucky Community Action Commission  
P.O. Box 193  
Covington, Kentucky 41012

Carl Melcher  
Northern Kentucky Legal Aid, Inc.  
302 Greenup  
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Assistant Attorney General

**ATTORNEY GENERAL'S SUPPLEMENTAL REQUESTS FOR INFORMATION**  
**Case No. 2007-00369**

1. Please reference the Motion to Amend, Paragraph 3. Please explain in detail why the Company believes that its existing WinterCare and Payment Plus programs are inadequate to address the needs of its low-income customers.
2. Please reference the Motion to Amend, Paragraph 4. Please explain in detail why the Company has proposed the 200% income level for participation in the proposed program.
3. Please reference the Motion to Amend, Paragraph 6. Please provide an estimate of the income levels of participants in the proposed program.
4. Please reference the Motion to Amend, Paragraph 1. Please provide copies of the referenced pilot program application.
5. Please reference the Motion to Amend, Paragraph 6. Please provide a proposed budget for the proposed program including all expenses.
6. Please reference the Motion to Amend, Paragraph 8. Please explain in detail why the Company believes this program needs to be implemented as quickly as requested given that we are nearing the end of the heating season.
7. Please reference the Motion to Amend, Paragraph 8. Please explain in detail whether there is any overlap between participants under this program with participants in any other of the Company's low-income program.