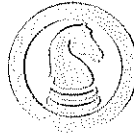


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PUBLIC SERVICE
COMMISSION



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August 22, 2008

VIA HAND DELIVERY

Stephanie L. Stumbo
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RE: Russell D. Alred v. Kentucky Utilities Company
Case No. 2008-00142

Dear Ms. Stumbo:

Enclosed please find and accept for filing the original and ten copies of Kentucky Utilities Company's First Data Requests to Russell D. Alred in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Also, the service list shown on the PSC website reflects only Lonnie Bellar, Vice President - State Regulation and Rates for E.ON U.S. Services, Inc., as the person to receive orders and pleadings in this case. Please add: Allyson Sturgeon, Senior Corporate Attorney, E.ON U.S. LLC, 220 West Main Street, Louisville, KY 40202 and Kendrick R. Riggs, Stoll Keenon Ogden PLLC, 2000 PNC Plaza, 500 West Jefferson Street, Louisville, KY 40202 to that list.

Should you have any questions please contact me at your convenience.

Yours very truly,

Kendrick R. Riggs

KRR:ec

cc: Parties of Record

400001 130674/538106 1

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RUSSELL D. ALRED)	
)	
COMPLAINANT)	
)	
vs.)	CASE NO. 2008-00142
)	
KENTUCKY UTILITIES COMPANY)	
)	
DEFENDANT)	

KENTUCKY UTILITIES COMPANY'S
FIRST SET OF DATA REQUESTS TO RUSSELL D. ALRED

Pursuant to the Kentucky Public Service Commission's ("Commission") August 11, 2008 Order establishing the procedural schedule in this proceeding, Kentucky Utilities Company ("KU") respectfully submits the following first set of data requests to the Complainant, Honorable Russell D. Alred, to be answered by September 19, 2008, the date specified in the Commission's August 11, 2008 Order.

Instructions

1. These requests shall be deemed continuing so as to require further and supplemental responses if Honorable Russell D. Alred, Circuit Court Judge ("Complainant") 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.

2. As used herein, "Documents" include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to Complainant, his witnesses or counsel (if any).

3. As used herein, "Complaint" means the complaint filed by Honorable Russell D. Alred with the Kentucky Public Service Commission against Kentucky Utilities Company and is the subject of this proceeding.

Data Requests

1. Please specifically identify each and every fact which supports the Complaint which is the subject of this proceeding before the Kentucky Public Service Commission.

2. Please provide each and every piece of evidence, including documentation in any form, which supports the Complaint which is the subject of this proceeding before the Kentucky Public Service Commission.

3. In his Complaint, Complainant states that "KU has unlawfully billed and required me and companies I own to pay a "Fuel Adjustment Clause" charge...." Please specifically state the complete name, address and tax identification number for each such company referenced in the Complaint which Complainant owns. With regard to each such company, please state:

(a) its physical location(s), if any;

(b) whether it is a customer of an electric utility and, if so, the identity of the entity or entities providing it retail electric service; and

(c) if it is provided with retail electric service by an entity other than KU, whether that entity charges its customers pursuant to a fuel adjustment clause.

4. In his Complaint, Complainant states that "KU should only be allowed to bill Customers authorized charges." Please provide any evidence or facts which support this allegation or otherwise show that KU was not authorized by the Public Service Commission to bill and collect fuel adjustment clause charges.

5. At the informal conference at the Commission on July 18, 2008, Complainant questioned whether there were other alternatives that KU could pursue to better protect itself and

its ratepayers from volatile fuel prices, suggesting coal contracts with a longer term or recovering charges through the filing of rate cases. Please provide any facts or other evidence which supports Complainant's beliefs or opinions that KU could better protect itself and its ratepayers from volatile fuel prices through coal contracts with longer terms or recovering charges through the filing of base rate cases.

6. At the informal conference at the Commission on July 18, 2008, Complainant questioned whether KU was purchasing sufficient amounts of coal from eastern Kentucky coal fields. Please provide any facts or other evidence which supports Complainant's beliefs or opinions that KU could or should purchase greater amounts of eastern Kentucky coal at prices that are lower than the prices KU is paying or has paid in the past.

7. Please state whether Complainant, or any of the reserves and/or mining operations in which Complainant or a member of his family has an interest, sells coal to any retail electric supplier. If so, please state the identity of such retail electric supplier.

8. Does Complainant agree that almost all of KU's electric generating facilities primarily burn coal as the fuel to generate electricity for distribution to its retail customers? If not, please state each and every fact and provide each and every piece of evidence, including documentation, in any form, which supports Complainant's answer to this question.

9. Does Complainant contend that KU's cost of fuel is unreasonable or imprudent? If so, please state each and every fact and provide each and every document or other form of evidence that supports Complainant's belief.


10. Does Complainant agree that he should pay KU for the cost of providing electric service to his residence and businesses? If not, please state each and every fact and provide each

and every piece of evidence, including documentation, in any form, which supports Complainant's answer to this question.

11. Does Complainant agree that he should pay and KU should charge no more and no less than KU's actual invoice price of fuel in the rates Complainant pays for electric service to his residence and businesses? If not, please state each and every fact and provide each and every piece of evidence, including documentation, in any form, which supports Complainant's answer to this question.

Dated: August 22, 2008

Respectfully submitted,



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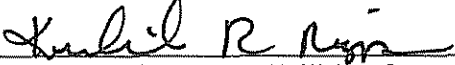
Allyson K. Sturgeon
Senior Corporate Attorney
E.ON U.S. LLC
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088

Counsel for Kentucky Utilities Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing First Set of Data Requests was served on the following on the 22nd day of August 2008, U.S. mail, postage prepaid:

Hon. Russell D. Alred
P.O. Box 288
Harlan, Kentucky 40831



Counsel for Kentucky Utilities Company