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November 14, 2008

RECEIVED

VIA HAND DELIVERY

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

NOV 14 2008

PUBLIC SERVICE
COMMISSION

RE: Application of Kentucky Utilities Company for an Adjustment of Base Rates
Case No. 2008-00251

Application of Kentucky Utilities Company to File Depreciation Study
Case No. 2007-00565

Dear Ms. Stumbo:

Enclosed please find and accept for filing the originals and ten copies each of Kentucky Utilities Company's Data Requests to the Attorney General, Kentucky Industrial Utility Customers, Inc., Community Action Kentucky, Inc., Community Action Council for Lexington-Fayette, Bourbon, Harrison & Nicholas Counties, Inc. and The Kroger Company in the above-referenced matters. 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.

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

Yours very truly,

Kendrick R. Riggs

KRR:ec
Enclosures
cc: Parties of Record

400001 129265/550749 1

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
FOR AN ADJUSTMENT OF BASE RATES) 2008-00251

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
TO FILE DEPRECIATION STUDY) 2007-00565

DATA REQUEST
OF KENTUCKY UTILITIES COMPANY
TO THE ATTORNEY GENERAL

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“AG”) to be answered by the date specified in the Kentucky Public Service Commission’s (“Commission”) procedural schedule order herein.

Instructions

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 the AG, its witnesses or counsel.

A. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if the AG 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.

C. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

E. If the AG has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for the Companies as soon as possible.

F. For any document withheld on the ground 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.

G. In the event any document requested has been destroyed or transferred beyond the control of the AG or any of its witnesses, 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 transferred by reason of a document retention policy, describe in detail the document retention policy.

H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer the Companies to the record where the document is located.

Data Requests

1. To the extent not previously provided, please provide electronic copies (on CD) of each Exhibit contained in the Attorney General's Expert Testimony. Please include all workpapers and supporting documentation used and relied upon by each witness in the preparation of these exhibits. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.
2. What is the Attorney General's position with regard to the proposal by Community Action Kentucky to increase the HEA from \$0.10 per meter per month to \$0.25 per meter per month?
3. Please provide copies of all schedules and underlying computations and workpapers developed in the analysis by the AG of KU's requested rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the analyses of the revenue requirement components and computations, including all ratemaking adjustments to the historic data, and the cost of service model.

Mr. Henkes

4. Provide an electronic copy in Excel format of Mr. Henkes' exhibits and workpapers with formulas, cell references, macros, and any VBA code intact.
5. Does Mr. Henkes believe that all effects of separate rate mechanisms including but not necessarily limited to the FAC, DSM and ECR should be removed when determining base rates? If not, please explain why not.
6. Do accumulated deferred taxes represent a difference between capitalization and rate base?
7. Does Mr. Henkes agree that accumulated deferred taxes reduce both capitalization and rate base? If the response is "no", please explain in detail and provide all supporting documentation for his response including all Commission orders, testimony and exhibits.
8. In reference to Mr. Henkes' proposed MISO Net Expense Adjustment, is Mr. Henkes proposing that estimates through the first quarter of 2015 be recognized for ratemaking purposes in this proceeding?
9. Does Mr. Henkes agree that the Company should update its revenue and expense adjustments to reflect charges through the date when new rates go into effect? Please explain the response.
10. Has Mr. Henkes presented testimony in regulatory proceedings in which he has opposed adjustments or has not opposed adjustments to the revenues or expenses in the test period for changes that occur after the end of the test period? If so, please state the name of the company, name of the case, case number, jurisdiction, the

specific recommendation made by Mr. Henkes and the applicable determination by the commission or agency in that case.

Mr. Watkins

11. Provide a complete copy of all of Mr. Watkins' workpapers, including (a) electronic copies of Excel spreadsheets with cell references, macros, and any VBA code intact, (b) Access data bases, queries and reports, (c) SAS procedures, and (d) handwritten notes and calculations. Such workpapers should include any analyses prepared by or under the direction of Mr. Watkins of the cost of service study submitted by W. Steven Seelye in this proceeding in Excel format, together with all linked files.
12. Please provide a fully executable computerized copy of any cost of service study that Mr. Watkins has prepared in connection with this proceeding, whether submitted or not, in Excel format, together with all linked files.
13. Please provide all workpapers, source documents and electronic spreadsheets relating to Mr. Watkins' analysis of the external allocators used in W. Steven Seelye's electric class cost of service study in this proceeding. In this response, please identify any documents provided by KU to the Attorney General, but do not produce copies of documents produced by KU to the Attorney General. Please provide both hard copies and electronic copies in Excel format of all documents produced in response to this data request.
14. Please provide all workpapers, source documents and electronic spreadsheets relating to Mr. Watkins' analysis of the class demands used in W. Steven Seelye's electric class cost of service study in this proceeding. In this response, please identify any documents provided by KU to the Attorney General, but do not produce copies of documents produced by KU to the Attorney General. Please provide both hard copies and electronic copies in Excel format of all documents produced in response to this data request.
15. Provide a listing of Mr. Watkins' prior regulatory experience showing the following information for each regulatory proceeding in which Mr. Watkins has testified: (a) the docket number of the case, (b) the regulatory jurisdiction, (c) the name of the utility, (d) the subject areas addressed in Mr. Watkins' testimony, and (e) the party on whose behalf Mr. Watkins testified.
16. Please provide copies of all of Mr. Watkins' direct and rebuttal testimony and cross-examination, as well as exhibits, on the subject of electric temperature normalization in rate proceedings involving electric and combination gas and electric companies within the last 5 years.
17. Please provide copies of all orders in cases in which Mr. Watkins has provided testimony regarding electric temperature normalization.

18. Provide a copy of all testimony and exhibits submitted by Mr. Watkins in any regulatory proceeding in which he discusses the functional assignment, classification or allocation of production costs.
19. Provide a copy of all testimony and exhibits submitted by Mr. Watkins in any regulatory proceeding in which he discusses a time-differentiated cost of service study.
20. Provide a copy of all testimony and exhibits submitted by Mr. Watkins in any regulatory proceeding in which he discusses the BIP methodology.
21. Please provide copies of all industry manuals, academic articles, text books and other authoritative sources used by Mr. Watkins in connection with his testimony regarding the cost of service methodology utilized by W. Steven Seelye in this proceeding.
22. Regarding Mr. Watkins' educational background, list all undergraduate and graduate statistics courses taken by Mr. Watkins.
23. Has Mr. Watkins recommended the use of the BIP methodology in any other regulatory proceeding? If Mr. Watkins has never recommended the use of the BIP methodology, explain in detail why he has never proposed the use of the BIP methodology in other regulatory proceedings and explain why he is recommending the BIP in this proceeding.
24. Has Mr. Watkins ever recommended the use of any other methodology for allocating production costs other than the BIP for an embedded cost of service study? If the response is "yes", then provide a detailed explanation of the other methodologies recommended by Mr. Watkins, explain why he did not recommend the BIP in those proceedings, and explain why he didn't recommend those other methodologies in this proceeding.
25. Is the BIP methodology Mr. Watkins' preferred cost methodology for allocating production costs in an embedded cost of service study? If the BIP is not Mr. Watkins's preferred methodology for allocating production costs, then describe his preferred methodology and explain why he didn't propose his preferred methodology in this proceeding?
26. Has Mr. Watkins ever recommended specifically against the use of the BIP methodology in any regulatory proceeding? If the response is "yes", indicate the jurisdiction and docket number and verify that the testimony is provided in response to Question No. 21.
27. On page 3, lines 9-11 of his testimony, Mr. Watkins states that, "From a conceptual standpoint, the general consensus of public utility commissions throughout the United States is that it is unreasonable to weather normalize electric utility revenues for ratemaking purposes."

- a. What is meant by the phrase “general consensus”?
 - b. Provide evidence to support this statement. Include in the response a copy of all studies, reports, surveys, regulatory orders, or other documents relied upon by Mr. Watkins to make this statement.
28. On page 5, lines 5-9 of his testimony, Mr. Watkins states as follows: “In other words, the current NOAA definition of normal weather is for the period 1971 through 2000. Because of short-term trends in seasonal weather patterns, shorter periods are sometimes used to define normal weather as well as using the most recent thirty years to define normal. I am also aware of instances in which much longer periods are used to define normal weather for a season.”
- a. For each instance referenced by Mr. Watkins for which a shorter period than 30 years is used, name the jurisdiction and provide the docket number and a full citation for the order where such “shorter period” was used.
 - b. For each instance referenced by Mr. Watkins for which a much longer period than 30 years is used, name the jurisdiction and provide the docket number and a full citation for the order where such “much longer period” was used.
 - c. For each instance referenced by Mr. Watkins for which the most recent thirty years is used, name the jurisdiction and provide the docket number and a full citation for the order where such “recent thirty years” was used.

29. In Question No. 107 of its first request for information to KU dated August 27, 2008, the Attorney General requested the following information, which the Company provided:

For each KU and LG&E generating unit, please provide hourly gross and net output (peak or average MW or MWH) for the period 5/1/07 through 4/30/08. Please provide in hardcopy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

Provide a detailed description of how this data was used by the AG or his consultants. Provide a copy of all workpapers, electronic spreadsheets, or Access files which were used to analyze the information provided. If the information was not utilized, please explain why.

30. In Question No. 111 of its first request for information to KU dated August 27, 2008, the AG requested the following information, which the Company provided:

For each hour during the period 5/1/07 through 4/30/08, please provide the following:

- a. total combined KU and LG&E system load (MW),
- b. KU and LG&E total load (MW) separately,
- c. KU native load (MW) (define native load),
- d. LG&E native load (MW) (define native load),

- e. KU non-native load (MW), and,
- f. LG&E non-native load (MW).

Please provide in hardcopy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

Provide a detailed description of how this data was used by the AG or his consultants. Provide a copy of all workpapers, electronic spreadsheets, or Access files which were used to analyze the information provided. If the information was not utilized, please explain why.

- 31. In Question No. 120 of its first request for information to KU dated August 27, 2008, the AG requested the following information, which the Company provided:

For each KU substation, please provide hourly demands (maximum load) for the period 5/1/07 through 4/30/08. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

Provide a detailed description of how this data was used by the AG or his consultants. Provide a copy of all workpapers, electronic spreadsheets, or Access files which were used to analyze the information provided. If the information was not utilized, please explain why.

- 32. Provide a detailed description of how the data provided in each of the responses to Question Nos. 105, 106, 108, 109, 110, 112, 113, 114, and 115 of the first request for information of the Attorney General to KU dated August 27, 2008, was used by the AG or his consultants. Provide a copy of all workpapers, electronic spreadsheets, or Access files which were used to analyze the information provided. If the information provided in any of these requests was not utilized, please explain why.

Dr. Woolridge

- 33. Please provide copies of all workpapers, in both hard copy and electronic copy with formulas intact, used by Dr. Woolridge in the preparation of his testimony and schedules.
- 34. Please provide copies of all of Dr. Woolridge's direct and rebuttal testimony and cross-examination, as well as all exhibits, in rate proceedings involving electric, gas and combination gas and electric companies within the last 5 years. Please include copies of final Orders in each of the referenced proceedings.
- 35. Please provide a complete copy of the September 2008 AUS Utility Report referenced on Exhibit JRW-2. Please ensure that the document is reproduced so that all shaded values are legible.

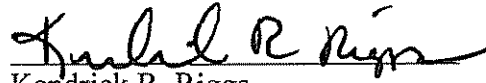
36. Please provide a complete copy of the October 2008 AUS Utility Report referenced on Exhibit JRW-6, page 2 of 5. Please ensure that the document is reproduced so that all shaded values are legible.
37. Please provide complete copies of all articles, studies, surveys, or other documentation supporting the equity risk premiums reported on Exhibit JRW-7, page 3 of 5.
38. Reference Woolridge Direct at 9:1-7. Please provide all analyses and/or workpapers supporting Dr. Woolridge's application of these listed criteria to identify his proxy group. For all companies that were considered for inclusion but rejected, please identify the criteria that caused each company to be rejected.
39. Please provide copies of all publications cited in the text of Dr. Woolridge's testimony.
40. Reference Woolridge Direct at 14:5 – 16:3. Please provide all support and analyses underlying the regression studies.
41. Please provide in table format a comparison of Dr. Woolridge's recommended ROE and the final awarded ROE for every case in which Dr. Woolridge participated in the last five years. Please include in the table the name of the company, name of the case, case number, jurisdiction and the specific recommendation made by Dr. Woolridge and the return awarded by the commission or agency in that case. Include a copy of the Order in each case.

Mr. Majoros

42. At page four of this testimony, in response to a question regarding the cost of removal of regulatory liability, Mr. Majoros states, "In most cases I recommend that this liability be reclassified from accumulated depreciation to Account 254 - Other Regulatory Liabilities for regulatory accounting, reporting and ratemaking purposes. Based on the policy decisions of some consumer advocate clients, I have also recommended that the regulatory liability be returned to ratepayers through a specific amortization period." Please state the recommendations Mr. Majoros has made in other jurisdictions concerning the regulatory treatment of the regulatory liability under these circumstances, including the case name, number, jurisdiction and outcome.

Dated: November 14, 2008

Respectfully submitted,



Kendrick R. Riggs
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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 was served on the following persons on the 14th day of November, 2008, by United States mail, postage prepaid:

Dennis G. Howard II
Assistant Attorney General
Office of the Attorney General
Office of Rate Intervention
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

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Louisville, KY 40202

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Willis L. Wilson
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Lexington-Fayette Urban County Government
Department of Law
200 East Main Street, P. O. Box 34028
Lexington, KY 40588-4028



Counsel for Kentucky Utilities Company

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
FOR AN ADJUSTMENT OF BASE RATES) 2008-00251

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
TO FILE DEPRECIATION STUDY) 2007-00565

DATA REQUEST
OF KENTUCKY UTILITIES COMPANY
TO THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to the Kentucky Industrial Utility Customers, Inc. (“KIUC”) to be answered by the date specified in the Kentucky Public Service Commission’s (“Commission”) procedural schedule order herein.

Instructions

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 KIUC, its witnesses or counsel.

A. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if KIUC 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.

C. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

E. If KIUC has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for the Companies as soon as possible.

F. For any document withheld on the ground 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.

G. In the event any document requested has been destroyed or transferred beyond the control of KIUC or any of its witnesses, 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 transferred by reason of a document retention policy, describe in detail the document retention policy.

H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer the Companies to the record where the document is located.

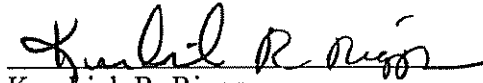
Data Requests

1. To the extent not previously provided, please provide electronic copies (on CD) of each Exhibit contained in the Kentucky Industrial Utility Customers, Inc. Expert Testimony. Please include all workpapers and supporting documentation used and relied upon by each witness in the preparation of these exhibits. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.
2. Please provide copies of all schedules and underlying computations and workpapers developed in the analysis by the KIUC of KU's requested rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the analyses of the revenue requirement components and computations, including all ratemaking adjustments to the historic data, and the cost of service model.
3. Provide a copy of all testimony and exhibits that address electric temperature normalization submitted by Mr. Baron in any regulatory proceeding.
4. Provide a complete copy of all of Mr. Baron's exhibits and workpapers, including electronic copies of Excel spreadsheets with formulas, cell references, macros, and any VBA code intact, and any handwritten notes and calculations.
5. Provide a copy of all testimony and exhibits that address electric temperature normalization submitted by Mr. Kollen in any regulatory proceeding.
6. Provide a complete copy of all of Mr. Kollen's workpapers, including electronic copies of Excel spreadsheets with formulas, cell references, macros, and any VBA code intact, and any handwritten notes and calculations. Such workpapers should include all schedules and underlying computations and workpapers developed in the analysis by KIUC of KU's proposed depreciation rates, including any analysis of net salvage percentages and annualized depreciation expense.
7. Provide an electronic copy in Excel format of Mr. Kollen's Exhibits with formulas, cell references, macros, and any VBA code intact.
8. Please refer to the statement made at page 20, lines 6 through 8 of Mr. Kollen's testimony. Provide all documentation that supports the statement that "there has been a warming cycle in temperatures in recent years".
9. Does Mr. Kollen agree that the Company's cost of long-term debt should be updated up to the time the record is closed?
10. Please confirm that the amount of the ECR rate base Mr. Kollen is proposing to exclude from KU's adjusted jurisdictional capitalization is \$415,886,486, which represents 100% of the jurisdictional net ECR rate base amount as shown on Rives Exhibit 3, Column 5, Line No. 22 and Line No. 43 of KU filing requirements 807 KAR 5:001 Section 10(6)(i) Kentucky Jurisdictional Net ECR Total Rate Base.

11. Is Mr. Kollen a member of the Society of Depreciation Professionals? If the response is “yes”, indicate if Mr. Kollen passed the certification exam and if he is currently certified as a depreciation expert.
12. Has Mr. Kollen ever conducted and submitted a depreciation study in any regulatory proceeding? If the response is “yes”, indicate the jurisdiction and docket number and include a copy of the all testimony and exhibits.
13. Provide a copy of all testimony and exhibits that address the equal life group depreciation procedure submitted by Mr. Kollen in any regulatory proceeding.
14. Provide a copy of all testimony and exhibits that address the average life group depreciation procedure submitted by Mr. Kollen in any regulatory proceeding.
15. Provide a copy of all testimony and exhibits that address the net salvage rates and cost of removal components of depreciation rates submitted by Mr. Kollen in any regulatory proceeding.
16. Please provide Mr. Kollen’s authority for his proposition that the coal credit could be included in the calculation of the Fuel Adjustment Clause.
17. Please specifically identify the members of KIUC who are participating in the KIUC intervention in this case.
18. Please identify any proceedings in which Mr. Kollen has made recommendations concerning the treatment or computation of income tax expense included in revenue requirements, including the name of the proceeding, case number and jurisdiction and provide a summary of the recommendation made.
19. Please identify any proceedings in which Mr. Kollen has made recommendations concerning the treatment or computation of income tax expense included in revenue requirements and comparable to his recommendation in this proceeding, including the name of the proceeding, case number and jurisdiction and provide a summary of the recommendation made.
20. For the purpose of revising Rives Exhibit 2 with KIUC’s recommendations, please confirm that the KU Jurisdictional Rate Base Percentage (Rives Exhibit 2, Column 9) that Mr. Kollen would recommend is 87.80%.

Dated: November 14, 2008

Respectfully submitted,



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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 was served on the following persons on the 14th day of November, 2008, by United States mail, postage prepaid:

Dennis G. Howard II
Assistant Attorney General
Office of the Attorney General
Office of Rate Intervention
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

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Michael L. Kurtz
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Joe F. Childers
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Lexington, KY 40507

Willis L. Wilson
Leslye M. Bowman, Director of Litigation
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street, P. O. Box 34028
Lexington, KY 40588-4028



Counsel for Kentucky Utilities Company

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
FOR AN ADJUSTMENT OF BASE RATES) 2008-00251

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
TO FILE DEPRECIATION STUDY) 2007-00565

DATA REQUEST
OF KENTUCKY UTILITIES COMPANY
TO THE COMMUNITY ACTION KENTUCKY, INC. AND
COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS COUNTIES, INC.

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to the Community Action Kentucky, Inc. (“CAK”) and Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (“CAC”) to be answered by the date specified in the Kentucky Public Service Commission’s (“Commission”) procedural schedule order herein.

Instructions

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 the CAK and CAC, their witnesses or counsel.

A. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if the CAK and CAC receive or generate additional information

within the scope of these requests between the time of the response and the time of any hearing conducted herein.

C. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

E. If the CAK and CAC have objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for the Companies as soon as possible.

F. For any document withheld on the ground 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.

G. In the event any document requested has been destroyed or transferred beyond the control of the CAK and CAC or any of their witnesses, 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 transferred by reason of a document retention policy, describe in detail the document retention policy.

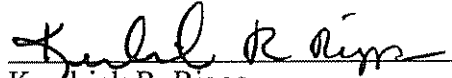
H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer the Companies to the record where the document is located.

Data Requests

1. To the extent not previously provided, please provide electronic copies (on CD) of all workpapers and supporting documentation used and relied upon by Community Action Kentucky, Inc. and Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. in preparation of its testimony. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.
2. Please provide a resume or curriculum vitae, showing Mr. Burch's and Mr. Bowmar's professional background and experiences, and education and training.
3. Please provide according to each fiscal year, the base, contingency and total amount of Low Income Home Energy Assistance Program ("LIHEAP") funds allocated to Kentucky from 2000 through 2009.
4. Please describe what, if any, financial contributions are made by the Commonwealth of Kentucky for the purpose of funding any LIHEAP type of assistance to low income households.
5. Please describe the actions by the Community Action Kentucky, Inc. and Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. to encourage or persuade federal or state legislatures to maintain or increase LIHEAP funding for each fiscal year.
6. Please state whether the recently announced increase in LIHEAP funds for Kentucky this year will allow additional low income households to benefit and if so the number of additional households that will benefit compared to the number of households that benefited from available LIHEAP funds last year.

Dated: November 14, 2008

Respectfully submitted,



Kendrick R. Riggs
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Stoll Keenon Ogden PLLC
2000 PNC Plaza
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the following persons on the 14th day of November, 2008, by United States mail, postage prepaid:

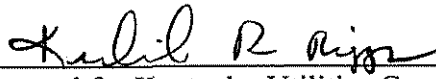
Dennis G. Howard II
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Frankfort, KY 40601-8204

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200 East Main Street, P. O. Box 34028
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Counsel for Kentucky Utilities Company

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
FOR AN ADJUSTMENT OF BASE RATES) 2008-00251

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
TO FILE DEPRECIATION STUDY) 2007-00565

DATA REQUEST
OF KENTUCKY UTILITIES COMPANY
TO THE KROGER COMPANY

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to The Kroger Company (“Kroger”) to be answered by the date specified in the Kentucky Public Service Commission’s (“Commission”) procedural schedule order herein.

Instructions

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 Kroger, its witnesses or counsel.

A. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

B. These requests shall be deemed continuing so as to require further and supplemental responses if Kroger 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.

C. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

D. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

E. If Kroger has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for the Companies as soon as possible.

F. For any document withheld on the ground 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.

G. In the event any document requested has been destroyed or transferred beyond the control of Kroger or any of its witnesses, 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 transferred by reason of a document retention policy, describe in detail the document retention policy.

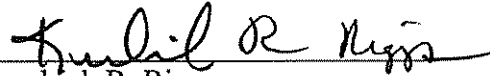
H. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer the Companies to the record where the document is located.

Data Requests

1. To the extent not previously provided, please provide electronic copies (on CD) of Mr. Higgins' Exhibit 1. Please include all workpapers and supporting documentation used and relied upon by Mr. Higgins in the preparation of this exhibit. Please provide all electronic spreadsheets in Excel format with cell formulas, cell references, macros and VBA code intact.

Dated: November 14, 2008

Respectfully submitted,



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