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PUBLIC SERVICE COMMISSION Kentucky Utilities Company

State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.eon-us.com

Robert M. Conroy Director - Rates T 502-627-3324 F 502-627-3213 robert.conroy@eon-us.com

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

December 5, 2008

RE: <u>APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN</u> <u>ADJUSTMENT OF BASE RATES</u> - Case No. 2008-00251

<u>APPLICATION OF KENTUCKY UTILITIES COMPANY TO FILE</u> <u>DEPRECIATION STUDY</u> – Case No. 2007-00565

Dear Ms. Stumbo:

Please find enclosed and accept for filing the original and ten (10) copies of an Revised Response of Kentucky Utilities Company to the Attorney General's (AG) Initial Requests for Information dated August 27, 2008, in the above-referenced matters.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,

Robert M. Conroy

Enclosures

cc: Parties of Record

Ms. Stephanie L. Stumbo December 5, 2008 Page 2 of 2

Counsel of Record

Allyson K. Sturgeon, Senior Corporate Attorney – E.ON U.S. LLC Robert M. Watt – Stoll Keenon Ogden PLLC (Kentucky Utilities) Kendrick R. Riggs – Stoll Keenon Ogden PLLC (Kentucky Utilities) W. Duncan Crosby – Stoll Keenon Ogden PLLC (Kentucky Utilities) Dennis Howard II – Office of the Attorney General (AG) Lawerence W. Cook – Office of the Attorney General (AG) Paul D. Adams – Office of the Attorney General (AG) Michael L. Kurtz – Boehm, Kurtz & Lowry (KIUC) David C. Brown – Stites and Harbison (Kroger) Willis L. Wilson – LFUCG Deparment of Law (LFUCG) Joe F. Childers – Getty & Childers PLLC (CAK and CAC)

Consultants to the Parties

Steve Seelye – The Prime Group (E.ON U.S. LLC) William A. Avera – FINCAP, Inc (E.ON U.S. LLC) John Spanos – Gannett Fleming, Inc. (E.ON U.S. LLC) Robert Henkes (AG) Michael Majoros – Snavely King Majoros O'Connor & Lee (AG) Glenn Watkins – Technical Associates (AG) Dr. J. Randall Woolridge – Smeal College of Business (AG) Lane Kollen – Kennedy and Associates (KIUC) Kevin C. Higgins – Energy Strategies, LLC (Kroger)

VERIFICATION

STATE OF KENTUCKY)) SS: **COUNTY OF JEFFERSON**)

The undersigned, Shannon L. Charnas, being duly sworn, deposes and says that she is the Director, Utility Accounting for Kentucky Utilities Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

sanny & Charnes

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 544 day of December, 2008.

Notary Public 00 (SEAL)

My Commission Expires: November 9, 2010

VERIFICATION

STATE OF KENTUCKY)) SS: COUNTY OF JEFFERSON)

The undersigned, Lonnie E. Bellar, being duly sworn, deposes and says that he is the Vice President, State Regulation and Rates for Kentucky Utilities Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Jomie & Belle

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $5\frac{16}{5}$ day of December, 2008.

Notary Public (SEAL)

My Commission Expires:

November 9, 2010

KENTUCKY UTILITIES COMPANY

CASE NO. 2008-00251 CASE NO. 2007-00565

December 5, 2008 Revised Response to Initial Requests for Information of the Attorney General Dated August 27, 2008

Question No. 65

Responding Witness: Shannon L. Charnas/Lonnie E. Bellar

- Q-65. With regard to expenses related to the Edison Electric Institute (EEI), please provide the following information:
 - a. Total EEI expenses booked in the test year.
 - b. Breakout (in approximate percentages) of the various EEI activities in the same format and detail as per the Company's response to AG-1-85(c) in LG&E's prior rate case, Case No. 2003-00433.

A-65.

a. Total EEI expenses booked in the test year are \$420,184.90. This amount includes all amounts paid directly to EEI or by means of a Company procurement card. The Company's employee expense reimbursement system does not provide individual vendor detail, so payments to EEI made directly by employees, for items such as course fees, are not included in this amount.

b. Beginning in 2007, EEI is no longer preparing the breakout of activities by NARUC category as provided in the last rate case. The amount of KU's total EEI expenses in the test year spent on lobbying are as follows:

		Percentage of	Lebbying
Activities	Amount	Lobbying Per EEI	Amount per EEI
EEI Dues:			
Regular Activities Industry Issues Separately Funded	\$ 270,929	16.15%	\$ 43,755
Activities (SFA)	26,688	35.86%	9,570
Environmental SFA Mutual Assistance	103,344	15.02%	15,522
Program	2,080	0.00%	-
Total Dues	\$ 403,041		\$ 68,847
EEI Training	17,144	0.00%	••
Total Paid EEI	\$ 420,185		\$ 68,847