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August 25, 2008

RECEIVED

AUG 26 2008

PUBLIC SERVICE  
COMMISSION

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

Re: Case No. 2008-00251, 2008-00252

**Initial Requests for Information on Behalf of CAK (2008-00252)**


**Initial Requests for Information on Behalf of CAK and CAC (2008-00251)**

Dear Ms. O'Donnell:

Enclosed is an original plus eleven of each of the above pleadings. Please date stamp the 11<sup>th</sup> copy of each pleading and return to me. A postage-paid envelope is enclosed.

Thank you for your assistance.

Sincerely,



Patricia Pruitt  
Secretary to Joe F. Childers, Esq.

Enclosures

tmp/letters/CAC/ltr Stumbo 08-25-08

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED  
AUG 26 2008  
PUBLIC SERVICE  
COMMISSION

In the Matter of:

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

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**INITIAL REQUESTS FOR INFORMATION  
ON BEHALF OF CAK AND CAC**


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Community Action Kentucky, Inc. (CAK) and Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. (CAC) hereby submit the following Initial Requests for Information to Kentucky Utilities Company (KU):

1. How many KU residential accounts were shut off for non-payment in each year 2003, 2004, 2005, 2006 and 2007?
2. How many KU residential accounts were shut off for non-payment during the period 1/1/2008 through 7/31/2008?
3. What is the total amount of funding KU has contributed in each year 2003, 2004, 2005, 2006 and 2007 to programs that directly assist its customers who have difficulty paying their bills?
4. How much have KU ratepayers, through voluntary donations given through billing statements, contributed to the Wintercare Energy Fund in each year 2003, 2004, 2005, 2006, and 2007? Also, how many ratepayers gave in each of those years?
5. How many low-income households, defined as having incomes at or below 100 percent of the federal poverty line defined by the U.S. Department of Health and Human Services, reside in the areas served by KU?

6. How many KU residential accounts are held by individuals age 65 and older?
7. What are the mean and median total monthly costs for residential customers in the KU service territory?
8. The current mean and median total monthly residential costs, i.e., the amounts reported in response to the preceding question, are what percentage of the monthly income for households of one, two, and three persons, respectively, with incomes at 100% of the Federal Poverty Level?
9. Based on the requested residential rate increase, what will be the real dollar annual increase for the mean and median residential customer?
10. The proposed mean and median total monthly residential costs, i.e., the amounts reported in response to the preceding question, are what percentage of the monthly income for households of one, two, and three persons, respectively, whose incomes are at 100% of the Federal Poverty Level?
11. Assuming approval of the requested residential rate increase, what will be the estimated mean and median total monthly costs for residential customers?
12. How many residential customers use 1,000 KWh or less each month and what percentage of that is the KU residential customer base? What are the mean, median and mode averages for residential monthly usage amounts in KWh?
13. What were the total arrearages owed by residential customers for the first four months of each year 2007 and 2008?

14. Given that the proposed increase in rates will make the cost of energy less affordable for many residential customers, does KU have a plan to prevent increases in its shutoff rates and the amount of arrearages owed by its residential customers?
15. How many residential customers did KU have in each of the years 2003, 2004, 2005, 2006, and 2007?
16. How many residential customers experienced a disconnection of KU service due to nonpayment in each of the years 2003, 2004, 2005, 2006, 2007?



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JOE F. CHILDERS

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**ATTORNEY FOR COMMUNITY  
ACTION KENTUCKY, INC AND  
COMMUNITY ACTION COUNCIL  
FOR LEXINGTON-FAYETTE,  
BOURBON, HARRISON, AND  
NICHOLAS COUNTIES, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document has been served on the following persons by United States mail on this the 25<sup>th</sup> day of August, 2008:

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