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PUBLIC SERVICE COMMISSION

Ms. Stephanie Stumbo, Executive Director Public Service Commission of Kentucky 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602

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

December 3, 2008

Rick E. Lovekamp Manager – Regulatory Affairs T 502-627-3780 F 502-627-3213 rick.lovekamp@eon-us.com

RE: APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AUTHORIZATION OF CHANGES IN SERVICE TERRITORY WITH WARREN COUNTY RECC - CASE NO. 2008-00459

Dear Ms. Stumbo:

Enclosed please find an original and three (3) copies of the Response of Kentucky Utilities Company to the Commission Staff's First Data Request dated November 19, 2008, in the above-referenced proceeding.

Please confirm your receipt of this information by placing the File Stamp of your Office on the enclosed additional copy. Should you have any questions regarding this transaction or this information, please contact me at (502) 627-3780.

Sincerely,

Rick E. Lovekamp

cc: Parties of Record

## COMMONWEALTH OF KENTUCKY

# BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter o	1:
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APPLICATION OF KENTUCKY UTILITIES	)
COMPANY FOR AUTHORIZATION OF	) CASE NO.
CHANGES IN SERVICE TERRITORY	) 2008-00459
WITH WARREN COUNTY RECC	)

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
COMMISSION STAFF'S FIRST DATA REQUEST
DATED NOVEMBER 19, 2008

FILED: DECEMBER 3, 2008

VERIFICATION

STATE OF KENTUCKY

COUNTY OF JEFFERSON )

The undersigned, **Rick E. Lovekamp**, being duly sworn, deposes and says that he is the Manager, Regulatory Affairs 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.

RICK E. LOVEKAMP

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 3rd day of December, 2008.

Victoria B. Harper (SEAL)
Notary Public

My Commission Expires:

#### KENTUCKY UTILITIES COMPANY

### Response to Commission Staff's First Data Request Dated November 19, 2008

Case No. 2008-00459

#### Question No. 1

Witness: Rick E. Lovekamp

- Q-1. Refer to Application Exhibit 3, Quadrant Map 3 of 3, Territorial Boundary Changes Between KU and Warren RECC ("Quadrant Map 3 of 3"), which appears to be based on the 1972 KU service territory map.
  - a. Provide a revised, signed Quadrant Map 3 of 3, based on the most recent KU service territory map filed with the Commission in 1982, or a newer map if available.
  - b. Provide a diagram of the service territory changes between KU and Warren RECC on the revised Quadrant Map 3 of 3.
- A-1. a. Please see the attached service territory map dated 1982.
  - b. Please see response (a.) above.