## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY	)	
FOR AN ORDER APPROVING THE ESTABLISHMENT	)	CASE NO.
OF A REGULATORY ASSET	)	2009-00174

## SECOND DATA REQUEST OF COMMISSION STAFF TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), pursuant to 807 KAR 5:001, is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due no later than July 7, 2009. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KU shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KU fails or

refuses to furnish all or part of the requested information, KU shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. Refer to the response to Item 3.a. of the Commission Staff's Initial Data Request ("Staff's First Request"). Provide an update of actual costs, estimated costs, and contingencies through the most recent date for which the information is available as of the due date for the response to this request.
- 2. Refer to the response to Item 4.b. of Staff's First Request. Provide the timetable under which KU plans to explore the process for performing the underwriting modeling associated with the electric industry catastrophic coverage program.
- 3. Refer to the response to Item 7.a. of Staff's First Request. Provide a narrative description and a detailed breakdown of each of the following miscellaneous costs: vehicle expenses; advertising; and telecommunications. Also include an explanation of why the level of costs incurred by KU for each of these items is significantly different than the level of costs incurred by Louisville Gas and Electric Company for the same item.

4. Refer to Exhibit 1 of KU's application, specifically, the costs identified as "Estimated Amount Considered Normal Operations." Provide a detailed description of how these costs were determined and calculated.

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Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602-0615

DATED: \_\_JUN 2 6 2009\_\_

cc: All Parties

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