COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR CERTIFICATES OF PUBLIC)	
CONVENIENCE AND NECESSITY AND)	CASE NO.
APPROVAL OF ITS 2009 COMPLIANCE PLAN)	2009-00197
FOR RECOVERY BY ENVIRONMENTAL)	
SURCHARGE)	

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 eight copies of the following information, with a copy to all parties of record. The information requested herein is due no later than September 22, 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 4.a. of the Commission Staff's First Data Request ("Staff's First Request"). The question was intended to focus on whether KU anticipates that the Brown Station will continue in service for 30 years into the future. With the ages of the units being 38, 46, and 52 years, describe KU's expectations for their expected service lives.
- 2. Refer to the response to Item 9.b. of Staff's First Request. Describe the nature of the more robust inspections that ATC Associates, Inc. ("ATC") is to perform on KU's impoundment facilities by November 15, 2009. At a minimum, the description should address whether test drilling, physical measurement of dam features, material testing, and calculations of spillway capacities and embankment stability will be done as part of the inspections.
- 3. Refer to the ACT report provided in response to Item 20 of Staff's First Request, specifically, its assessment of the Ghent sediment pond. State whether KU has addressed the deficiencies noted in the report and describe how it addressed, or intends to address, those deficiencies.

4. Refer to the ACT draft report provided in response to Item 21 of Staff's First Request, specifically, its assessment of the Tyrone finishing pond. State whether KU has addressed the deficiencies noted in the report and describe how it addressed, or intends to address, those deficiencies.

Jeff Derouer

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED: <u>SEP 1 1 2009</u>

CC: Parties of Record

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