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November 9, 2009

Mr. Jeff DeRoun Executive Director Kentucky Public Service Commission P.O. Box 615 211 Sower Boulevard Frankfort, Kentucky 40602-0615 NOV 09 2009

PUBLIC SERVICE COMMISSION

RE: In the Matter of: THE APPLICATION OF KENTUCKY UTILITIES COMPANY CONCERNING THE NEED TO OBTAIN CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION OF TEMPORARY TRANSMISSION FACILITIES IN HARDIN COUNTY, KENTUCKY Public Service Commission Case No. 2009-325

Dear Mr. DeRouen

Enclosed find one original and seven copies of our Request for Supplemental Data in the above styled case.

. Henry Graddy, IV

CC: Mr. Lonnie Bellar

Mr. Rick E. Lovekamp Hon. Allyson K. Stugeon

CDH LLC, c/o Ms. Cathy Cunningham

Violet Monroe Mary Jent

WHG: dtr

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COMMONWELATH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:			
THE APPLICATION OF KENTUCKY UTILITIES COMPANY CONCERNING THE NEED TO OBTAIN CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION OF TEMPORARY TRANSMISSION FACILITIES IN HARDIN COUNTY, KENTUCKY))))))	CASE NO. 2009-00325	NOV 09 2009 PUBLIC SERVICE COMMISSION
CDH PRESERVE, LLC, DEN CATHY CUNNINGHAM, V		/	

Come CDH Preserve, LLC, Dennis Cunningham, Cathy Cunningham, Violet Monroe, and Mary Jent, Applicants for Full Intervention, by and through the undersigned counsel, and submit this Request for Data, supplemental to the Commission Staff's First Data Request, as follows:

AND MARY JENT REQUEST FOR SUPPLEMENTAL DATA

Pursuant to 807 KAR 5:001, Kentucky Utilities Company ("KU") is requested to file with the Commission and serve upon all parties, including these Applicants for Intervention the following information on or before November 16, 2009. This request for supplemental data requests such data be provided pursuant to the same instructions as set forth in the Commission Staff's First Data Request, which instructions are incorporated by reference herein as if set forth fully herein.

- 1. With respect to the Application filed by KU, paragraph 5, quoting prior testimony that, "They [the transmission facilities that make up the MC-HC line] will need to be in service when TC2 comes on line in the second quarter of 2010." have KU and LG&E evaluated the option of postponing the date for bringing TC2 online? If so, what options have been considered? Or if not, why not?
- 2. With reference to the KU Response to the Motion to Intervene filed by these Applicants, at Footnote 23, KU refers to the Staff Report filed October 13, 2009 in the matter of "The 2008 Joint Integrated Resource Plan" of the Companies, Case No. 2008-00148, ("2008 IRP") which includes Key Macroeconomic Assumptions in GI's forecast, at page 6, as follows: "The forecast assumes that the economy suffers no major shocks between the first quarter 2007 and 2037." Do you maintain that the economy has not already suffered a "major shock" commencing in 2008 and continuing into 2009? If you do not think such "major shock" has occurred, what is your basis? If you agree that such a "major shock" has occurred and continues to occur, what changes does such a "major shock" cause to be made in the forecasts you submitted in the 2008 IRP?
- 3. The 2008 IRP forecast on a combined basis, weather-normalized energy requirements to grow from 2007 to 2012 at an average annual growth rate of 1.5 percent. Staff Report, page 10. The 2008 IRP forecast a combined summer peak demand after industrial curtailments to grow from 2008 to 2012 at an average annual growth rate of 1.4 percent. Staff Report, page 10. Has

through this date in 2009 at a rate of 1.5 percent as forecast? Has the combined summer peak demand grown from 2008 through this date in 2009 at an average annual growth rate of 1.4 percent? What has been the combined and separate growth in energy requirement from the actual sales data submitted in the 2008 IRP to the present date? What has been the combined and separate actual summer and winter peak demand from the actual data included within the 2008 IRP to the present date?

4. Does LG&E have a valid permit for the TC2 facility under the Clean Air Act, with final approval by the Kentucky Division of Air Quality and the U.S.E.P.A.? Does LG&E have a valid permit under the Clean Water Act to discharge wastewater from the TC2 facility with final approval from the Kentucky Division of Water and from U.S. E.P.A.? What do you state is the status of such permits? Will TC2 be able to complete construction and commence operation without a valid and final Clean Air Act permit and without a valid and final Clean Water Act discharge permit?

Respectfully Submitted,

W. Henry Graddy, IV (#26350)

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CERTIFICATE OF SERVICE

I hereby certify that the original and ten copies of the forgoing Data Request supplementing the Commission Staff's First Data Request will be delivered to the office of Jeff Derouen, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, KY 40601, and that copies were mailed to the following parties:

Lonnie Bellar, Vice President Manager, Regulatory Services E.ON US Services, Inc. 220 West Main Street Louisville, KY 40202

Rick E. Lovekamp Manager-Regulatory Affairs E.ON US Services, Inc. 220 West Main Street Louisville, KY 40202

Honorable Allyson K. Sturgeon Senior Corporate Counsel E.ON US Services, Inc. 220 West Main Street Louisville, KY 40202

This the _____ day of November, 2009.

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