

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

JOINT APPLICATION OF KENTUCKY)
UTILITIES COMPANY AND LOUISVILLE GAS)
AND ELECTRIC COMPANY FOR APPROVAL) CASE NO. 2009-00329
OF DEPRECIATION RATES FOR TRIMBLE)
COUNTY UNIT 2)

ATTORNEY GENERAL'S INITIAL REQUESTS FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to Kentucky Utilities Co. and Louisville Gas & Electric Co. [hereinafter jointly referred to as "EON"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for EON with an electronic version of these questions, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

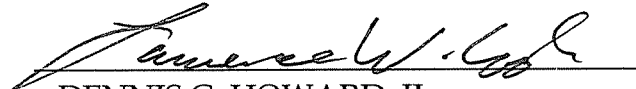
(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(11) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(12) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



DENNIS G. HOWARD, II
LAWRENCE W. COOK
PAUL D. ADAMS
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE, STE. 200
FRANKFORT KY 40601-8204
(502) 696-5453
FAX: (502) 573-8315

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Robert M. Conroy
State Regulation and Rates
E.ON U.S. LLC
220 W. Main St.
Louisville, KY 40202

Hon. Michael L. Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 E. 7th St.
Ste. 1510
Cincinnati, OH 45202

Hon. Kendrick R. Riggs
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W. Jefferson St.
Louisville, KY 40202-2828

Hon. Allyson K. Sturgeon
Senior Corporate Attorney
E.ON U.S. LLC
220 W. Main St.
Louisville, KY 40202

this 18th day of September, 2009


Assistant Attorney General

**Attorney General's Initial Data Requests to Kentucky Utilities Co.
and Louisville Gas & Electric Co.
Case No. 2009-00329**

1. Are the depreciation rates proposed by EON bases in whole or in any part upon the Equal Life Group ("ELG") methodology?
2. Are said depreciation rates based in whole or in any part upon the Broad Group methodology?
3. Do the rates proposed by EON include any lives and curves?
 - a. If "yes," are the lives and curves based in whole or any part upon the depreciation rates approved in the last EON rate cases (2008-00251 and 2008-00252)?
4. Do the depreciation rates EON proposes for Trimble Unit 2 include any net salvage proposals?
 - a. If "yes," do they address future inflation in any manner? Describe in detail. If not, does EON have any plans for addressing future inflation in the subject depreciation rates?
5. Will EON's application for its next rate cases address the rates applicable in the instant matter in any manner? If so, describe in detail.
6. Given EON's filing of Case No. 2009-00353 ("Louisville Gas And Electric Company and Kentucky Utilities Company Application for Approval of Purchased Power Agreements and Recovery of Associated Costs"), in which EON either seeks or will seek Commission approval for the companies to purchase power generated by wind turbines owned by an Illinois utility, is it appropriate for EON to seek depreciation for all of its share of Trimble Unit 2 since a significant portion of that unit's production originally intended for use by EON's ratepayers now will not be necessary, but will instead be distributed to off-system sales?