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RECEIVED

OCT 09 2009

PUBLIC SERVICE
COMMISSION

Via Overnight Mail

October 8, 2009

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

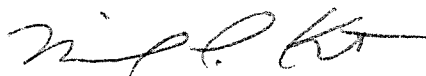
Re: Case No. 2009-00329

Dear Mr. Derouen:

Please find enclosed the original and twelve (12) copies of KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.'S FIRST SET OF DATA REQUEST TO KENTUCKY UTILITIES COMPANY and LOUISVILLE GAS & ELECTRIC COMPANY filed in the above-referenced matter. By copy of this letter, all parties listed on the Certificate of Service have been served.

Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Attachment
cc: Certificate of Service

CERTIFICATE OF SERVICE

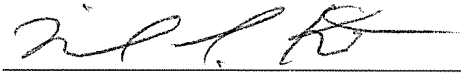
I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by electronic mail (when available) and first-class postage prepaid mail, (unless otherwise noted) to all parties on the 8th day of October, 2009.

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Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In The Matter Of: Joint Application of Kentucky Utilities Company and : **Docket No. 2009-00329**
Louisville Gas & Electric Company for Approval of Depreciation Rates :
for Trimble County Unit 2 :

**FIRST SET OF DATA REQUESTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO KENTUCKY UTILITIES COMPANY and
LOUISVILLE GAS & ELECTRIC COMPANY**

Dated: October 8, 2009

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “Companies” means Kentucky Utilities Company (KU) and Louisville Gas & Electric Company (LG&E) and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total company as well as Intrastate data, unless otherwise requested.

**KIUC FIRST SET OF DATA REQUESTS TO
KENTUCKY UTILITIES COMPANY and
LOUISVILLE GAS & ELECTRIC COMPANY
PSC CASE NO. 2009-00329**

- 1.1. Please provide all workpapers developed by and a copy of all source documents relied on by Gannet Fleming in the derivation of the proposed Trimble County 2 (“TC2”) depreciation rates by plant account, including, but not limited to the following:
 - a) Life span.
 - b) Survivor curve
 - c) Interim net salvage rate
 - d) Terminal net salvage rate
 - e) Depreciation rate
- 1.2. Refer to the letter from Mr. Spanos of Gannet Fleming attached to the Companies’ Application in this proceeding wherein Mr. Spanos provides the proposed depreciation rates and states that “[e]ach of these parameters are established with the general understanding of the new facility and the estimates of other comparable facilities across the United States.”
 - a. Please provide all source documents relied on by Mr. Spanos for his general understanding of the new facility and describe how each source and type of data was used by Mr. Spanos to develop the proposed depreciation rates.
 - b. Please provide all estimates of other comparable facilities across the United States relied on by Mr. Spanos and describe how each source and type of data was used by Mr. Spanos to develop the proposed depreciation rates.
- 1.3. Please disaggregate the net salvage percent into interim and terminal net salvage percentages by plant account.
- 1.4. To the extent Gannet Fleming relied on parameters underlying the present depreciation rates for TC1 to develop its proposed parameters and depreciation rates for TC2, please provide all workpapers developed by and a copy of all source documents relied on by Gannet Fleming to develop the parameters underlying the present depreciation rates for TC1.
- 1.5. Please describe each step in the process whereby Gannet Fleming developed, evaluated and decided on the net negative salvage component of the proposed TC 2 depreciation rates by plant account. Separately describe the process for interim net negative salvage and for terminal net negative salvage. Identify and describe all assumptions, data sources, source documents and computations/workpapers obtained, developed and/or relied on for each step of the process.
- 1.6. Please provide a copy of all dismantling studies and/or analyses performed by or relied on by Gannet Fleming in the derivation of the net salvage component of the proposed TC2 depreciation rates in total and by plant account.
- 1.7. Please provide the dollar amount of terminal net salvage developed by or relied on by Gannet Fleming in the derivation of the net salvage component of the proposed TC2 depreciation rates in total and by plant account.

- 1.8. Please provide a copy of all analyses and/or comparative quantifications in dollars, dollars/kW and/or percentages used by and relied on by Gannet Fleming to assess the reasonableness of the interim and terminal net negative salvage components of the proposed TC2 depreciation rates by plant account.

Respectfully submitted,



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Kurt J. Boehm, Esq.

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**COUNSEL FOR KENTUCKY INDUSTRIAL
UTILITY CUSTOMERS, INC.**