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PUBLIC SERVICE COMMISSION

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 166

- Q-166. For any asset retirement obligations identified above, please provide the "fair value" of the obligation. For the purposes of the question, fair value means "the amount at which that liability could be settled in a current [not future] transaction between willing parties, that is, other than in a forced or liquidation transaction." Please provide all assumptions and calculations underlying these amounts.
- A-166. See response to Question No. 165.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 167

- Q-167. Please provide the "credit adjusted risk free rate" used for any and all ARO calculations under FASB Statement No. 143, FIN 47, and FERC Order No. 631 calculations to date.
- A-167. The "credit adjusted risk free rate" used for FASB Statement No. 143 was 6.61%. The "credit adjusted risk free rate" for FIN 47, provided by E.ON AG, was 5.837% for those assets with 30+ years of remaining life. FERC Order No. 631 does not have separate calculations.

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# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 168

- Q-168. Please provide complete copies of all Board of Director's minutes and internal management meeting minutes from 2005-2008, inclusive, in which any or all of the following subjects were discussed: the Company's electric plant depreciation rates; retirement unit costs; SFAS No. 143; FIN 47; and, FERC RM02-7-000.
- A-168. See attached CD, in folder titled Question No. 168.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 169

- Q-169. Please provide all accounting entries (debits and credits) relating to SFAS No. 143 and FIN 47, along with all workpapers supporting those entries. Please provide all these workpapers and calculations in electronic format (Excel) with all formulae intact.
- A-169. See attached for test year journal entries. Also, see attached CD, in folder titled Question No. 169 for the electronic format. See response to KPSC-1 Question No. 54(b) for implementation journal entries.

# Kentucky Utilities Company Journal Entries related to FASB 143 Test Year November 2008 - October 2009 (\$000's)

DESCRIPTION	D	DEBIT		CREDIT	
Monthly Depreciation and Accretion			inea 7		
Depreciation Expense-Acct 403 (Parent- Cost of Removal) Regulatory Liability-Acct 254 Depr expense for net cost of removal on parent assets.	\$	243	\$	243	
Depreciation Expense-Acct 403 (Child) Accumulated Depreciation-Acct 108 Depr expense on child assets.	\$	300	\$	300	
Accretion Expense-Acct 411 ARO Liability-Acct 230 Record accretion expense on ARO liability.	\$	2,087	\$	2,087	
Regulatory Asset-Acct 182 Regulatory Credit-Acct 407 To reverse child depr/accretion to regulatory asset (Income statement n	\$ eutral)	2,386	\$	2,386	
Cash Payments			TO SECTION OF THE SEC		
Accumulated Depreciation-RWIP-Acct 108 Cash-Acct 131 Cash payments for cost of removal.	\$	533	\$	533	
ARO Settlement Activity			- 1940. 71 N. V		
ARO Liability-Acct 230 Regulatory Asset-Acct 182 Reversal of ARO liability for settlement of obligations.	\$	307	\$	307	
Accumulated Depreciation-Acct 108 (Cost of Removal) Accumulated Depreciation-RWIP-Acct 108 Application of cost of removal cash against reserves.	\$	307	\$	307	
ARO Asset Accumulated Depreciation-Acct 108 Plant in Service-Acct 101 (ARO child cost) Retirement of ARO child assets for liabilities settled.	\$	4	\$	4	

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 170

- Q-170. Please refer to page 76 of KU's December 31, 2008 Form 10-K. If not provided elsewhere, provide the workpapers supporting the calculation of the \$707 million (2007) and \$698 million (2006) regulatory liabilities for costs of removal.
  - a. Please provide all these workpapers and calculations in electronic format (Excel) with all formulae intact.
  - b. Provide the calculation of the cost of removal regulatory liability amounts on a plant account by plant account basis.
  - c. Provide the cost of removal regulatory liability amounts on a plant account by plant account basis attributed to Kentucky jurisdictional plant.
- A-170. Kentucky Utilities Company did not file a 10-K for 2008. The numbers quoted above do not pertain to KU.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# **Question No. 171**

- Q-171. Provide an analysis of the regulatory liability for accrued asset removal costs since inception identifying and explaining each debit and credit entry and amount. Also, provide the copies of the pages from each of KU's SEC Form 10Ks, Form 10Qs and Annual Reports in which SFAS No. 143 was ever mentioned, whether or not KU had quantified an amount of the regulatory liability at the time. Specify the exact date each of these reports was issued and released to the public.
- A-171. Please see the following table for an analysis of the regulatory liability for accrued asset removal cost since inception:

	Φ (056 544 062)
Regulatory Liability Balance 12/31/03	\$ (256,744,263)
Depreciation	(18,825,793)
Net Cost of Removal Charges	8,765,059
Regulatory Liability Balance 12/31/04	(266,804,997)
Depreciation	(19,794,852)
Net Cost of Removal Charges	4,101,461
Reclass of COR to Regulatory Liability from Life Reserves	1,569,312
Regulatory Liability Balance 12/31/05	(280,929,076)
Depreciation	(19,785,945)
Net Cost of Removal Charges	3,401,885
Regulatory Liability Balance 12/31/06	(297,313,136)
Depreciation	(20,646,337)
Net Cost of Removal Charges	8,032,396
Regulatory Liability Balance 12/31/07	(309,927,077)
Depreciation	(23,611,534)
Net Cost of Removal Charges	4,797,840
Regulatory Liability Balance 12/31/08	(328,740,771)
Depreciation	(15,468,045)
Net Cost of Removal Charges	14,843,796
Regulatory Liability Balance 10/31/09	\$ (329,365,020)

For copies of pages referencing SFAS No. 143<sup>1</sup> from LG&E's SEC Form 10Ks, Form 10Qs and Annual Reports, see the CD provided, in the folder titled Question No. 171. The following table specifies the date these reports were released:

<b>Document</b>	Released Date
2008 LG&E Annual Report	03/24/09
2008 KU Annual Report	03/24/09
2007 LG&E Annual Report	03/20/08
2007 KU Annual Report	03/20/08
2006 LG&E 10-K	03/21/07
2006 KU Annual Report	03/29/07
2006 LG&E and KU 10-Q, quarter ended 3/31/06	05/04/06
2005 LG&E and KU 10-K	03/30/06
2005 LG&E and KU 10-Q, quarter ended 9/30/05	11/10/05
2005 LG&E and KU 10-Q, quarter ended 6/30/05	08/12/05
2005 LG&E and KU 10-Q, quarter ended 3/31/05	05/13/05
2004 LG&E and KU 10-K	03/30/05
2003 LG&E and KU 10-K	03/30/04
2003 LG&E and KU 10-Q, quarter ended 9/30/03	11/13/03
2003 LG&E and KU 10-Q, quarter ended 6/30/03	08/13/03
2003 LG&E and KU 10-Q, quarter ended 3/31/03	05/14/03
2002 LG&E and KU 10-K	03/25/03
2002 LG&E and KU 10-Q, quarter ended 9/30/02	11/14/02
2002 LG&E and KU 10-Q, quarter ended 6/30/02	08/14/02
2002 LG&E and KU 10-Q, quarter ended 3/31/02	05/14/02
2001 LG&E and KU 10-K	03/28/02
2001 LG&E and KU 10-Q, quarter ended 3/31/01	11/14/01

<sup>&</sup>lt;sup>1</sup> The guidance in SFAS No. 143 is now contained in FASB Accounting Standards Codification Topic 410, adopted effective September 30, 2009.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 172

- Q-172. Provide KU's projection of the annual year-end balance in the regulatory liability for cost of removal obligations for KU for the next 20 years. If not available for the next twenty years provide for as many years into the future that the projection is available. If this projection has not been made, please explain why not. Provide in electronic format (Excel) with all formulae intact.
  - a. For this projection assume that all of KU's current depreciation rates are continued in use.
  - b. Explain all other assumptions used to make this projection.
- A-172. For planning purposes, KU currently projects the cost of removal obligations for a ten year period. The latest projections include data through December 2019. Data past this time period is not available.
  - a. The projections presented in the table below (in thousands) use KU's existing depreciation rates and are based on projections made in July 2009.
  - b. Costs for the physical work associated with the removal of assets are projected for a ten year planning period. These costs are based on historical trends for normal business activities and adjusted for one-time major projects. Costs related to normal, on-going business activities are adjusted annually for inflation and labor increases, typically around 3% per annum.

#### Page 2 of 2 Charnas \$ 333,969 Regulatory Liability projected balance 2009 (6,614)Charges 19,307 Depreciation 346,662 Regulatory Liability projected balance 2010 (7,664)Charges 20,507 Depreciation 359,505 Regulatory Liability projected balance 2011 (8,502)Charges 20,507 Depreciation Regulatory Liability projected balance 2012 371,510 (9,856)Charges Depreciation 20,507 382,161 Regulatory Liability projected balance 2013 (8,696)Charges 20,507 Depreciation 393,972 Regulatory Liability projected balance 2014 (8,877)Charges 20,507 Depreciation Regulatory Liability projected balance 2015 405,602 Charges (9,061)Depreciation 20,507 417,048 Regulatory Liability projected balance 2016 (9,249)Charges 20,507 Depreciation Regulatory Liability projected balance 2017 428,306 Charges (9,441)Depreciation 20,507 Regulatory Liability projected balance 2018 439,372 (9,638)Charges Depreciation 20,507

Regulatory Liability projected balance 2019

Response to Question No. 172

\$450,241

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 173** 

- Q-173. For all accounts for which KU has collected non-legal AROs, but instead recorded a regulatory liability (regulatory liability for cost of removal), please provide the fair value of the related asset retirement cost as of December 31, 2005; December 31, 2006; December 31, 2007, December 31, 2008 and December 31, 2009. For the purposes of this question, assume that KU has legal AROs for these accounts, and use the life and dispersion assumptions reflected in the current depreciation rates.
- A-173. KU is not required under any accounting or regulatory standard to perform these hypothetical calculations. Therefore, these hypothetical calculations require original work and have not been prepared.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 174

Responding Witness: John J. Spanos

- Q-174. Provide the calculation of the annual amount of future gross salvage, cost of removal and net salvage incorporated into KU's existing depreciation rates. If any of the amounts are reduced by the total amount of non-legal AROs included in year-end accumulated depreciation, show that calculation.
- A-174. The attached spreadsheet sets forth the calculation of the future annual gross salvage and cost of removal incorporated in KU's current depreciation rates by account. None of the amounts are reduced by the amount of non-legal ARO.

# FUTURE ANNUAL COST OF REMOVAL AND GROSS SALVAGE AS OF DECEMBER 31, 2006

	ACCOUNT	SURVIVOR CURVE		NET SALVAGE PERCENT	ORIGINAL COST	COST OF REMOVAL ACCRUAL AMOUNT	GROSS SALVAGE ACCRUAL AMOUNT
	(1)	(2)		(3)	(4)	(5)	(6)
	DEPRECIABLE PLANT						
	STEAM PRODUCTION PLANT	-					
311.00	STRUCTURES AND IMPROVEMENTS						
511.00	TYRONE UNIT 3	100-\$1.5	*	(5)	5,447,348.04	0	0
	TYRONE UNITS 1 & 2	100-S1.5	*	(5)	594,089.12	0	0
	GREEN RIVER UNIT 3	100-S1.5	*	(5)	2,818,747.44	0	0
	GREEN RIVER UNIT 4	100-S1.5	*	(5)	4,475,383.64	0	0
	GREEN RIVER UNITS 1 & 2	100-S1 5	*	(5)	2,596,589.06	0	0
	E W BROWN STEAM UNIT 1	100-S1.5	*	(5)	4,294,488.60	2,627	0
	E W BROWN STEAM UNIT 2	100-S1.5	*	(5)	1,542,703.85	0	0
	E W BROWN STEAM UNIT 3	100-S1-5	*	(5)	12,466,774.95	7,407	0
	GHENT UNIT I SCRUBBER	100-S1 5	*	(5)	24,298,756.00	62,407	0
	GHENT UNIT I	100-81.5	*	(5)	17,160,534.10	8,253	0
	GHENT UNIT 2	100-S1.5	*	(5)	16,175,819.55	9,435	0
	GHENT UNIT 3	100-S1.5	•	(5)	43,264,065.36	77,480	0
	GHENT UNIT 4	100-51.5	*	(5)	22,674,768.92	40,473	0
	SYSTEM LABORATORY	100-S1.5	•	(5)	805,717.00	1,432	
	TOTAL ACCOUNT 311 - STRUCTURES AND IMPROVEMENTS				158,615,785.63	209,515	0
312.00	BOILER PLANT EQUIPMENT						
	TYRONE UNIT 3	65-R2	٠	(20)	12,078,002.67	101,577	(11,162)
	TYRONE UNITS 1 & 2	65-R2	٠	(20)	3,531,623.26	80	0
	GREEN RIVER UNIT 3	65-R2	*	(20)	11,195,261.77	72,869	(10,121)
	GREEN RIVER UNIT 4	65-R2	٠	(20)	23,652,944.82	200,339	(22,015)
	GREEN RIVER UNITS 1 & 2	65-R2	*	(20)	399,431.39	2,366	(240)
	E W BROWN STEAM UNIT I	65-R2	٠	(20)	35,546,187.28	275,356	(33,995)
	E W BROWN STEAM UNIT 2	65-R2	•	(20)	29,161,949.77	228,683	(27,888)
	E W BROWN STEAM UNIT 3	65-R2	*	(20)	79,655,480.64	551,335	(75,525)
	PINEVILL UNIT 3	65-R2	*	(20)	279,751.37	0	0
	GHENT UNIT 1 SCRUBBER	65-R2	*	(20)	86,520,258 20	742,884	(83,470)
	GHENT UNIT 1	65-R2		(20)	162,626,761.08	1,350,880	(108,691)
	GHENT UNIT 2	65-R2 65-R2		(20)	89,742,087.02	553,739	(59,633) (162,999)
	GHENT UNIT 3	65-R2	•	(20) (20)	244,747,430.08 247,916,189.17	1,303,989 1,529,958	(164,765)
	GHENT UNIT 4 GHENT LOCOMOTIVES - RAIL CARS	25-R2		20	7,647,232.00	0	(51,497)
	TOTAL ACCOUNT 312 - BOILER PLANT EQUIPMENT				1,034,700,590.52	6,914,054	(812,002)
314.00	TURBOGENERATOR UNITS						
	TYRONE UNIT 3	55-R2.5	*	(15)	4,154,426.75	22,928	(5,829)
	TYRONE UNITS 1 & 2	55-R2.5	•	(15)	1,592,029.00	0	0
	GREEN RIVER UNIT 3	55-R2.5	*	(15)	4,214,807.78	22,968	(5,839)
	GREEN RIVER UNIT 4	55-R2.5	*	(15)	10,005,416.72	56,136	(14,034)
	E W BROWN STEAM UNIT I	55-R2.5	*	(15)	4,997,832.45	16,943	(1,452)
	E W BROWN STEAM UNIT 2	55-R2.5	•	(15)	10,874,093.96	56,261	(15,628)
	E W BROWN STEAM UNIT 3	55-R2.5	•	(15)	27,652,379.12	161,082	(39,610)
	PINEVILL UNIT 3	55-R2.5	*	(15)	6.00	0	0
	GHENT UNIT I	55-R2.5	•	(15)	25,577,292.00	106,236	(19,316)
	GHENT UNIT 2	55-R2.5	•	(15)	29,546,660.86	131,539	(22,390)
	GHENT UNIT 3	55-R2.5	*	(15)	39,424,927.73	159,155	(30,315)
	GHENT UNIT 4	55-R2.5	•	(15)	51,736,214.11	237,611	(39,602)
	TOTAL ACCOUNT 314 - TURBOGENERATOR UNITS				209,776,086.48	970,859	(194,016)

# FUTURE ANNUAL COST OF REMOVAL AND GROSS SALVAGE AS OF DECEMBER 31, 2006

	ACCOUNT (1)	URVIVOR CURVE (2)		NET SALVAGE PERCENT (3)	ORIGINAL COST (4)	COST OF REMOVAL ACCRUAL AMOUNT (5)	GROSS SALVAGE ACCRUAL AMOUNT (6)
215.00	ACCESSORY ELECTRIC EQUIPMENT						
315.00	TYRONE UNIT 3	70-S3		(5)	570,737.00	0	0
	TYRONE UNITS 1 & 2	70-S3	*	(5)	828,017.00	0	0
	GREEN RIVER UNIT 3	70-S3		(5)	741,256.89	0	0
	GREEN RIVER UNIT 4	70-S3	*	(5)	1,145,214.38	1,022	0
	E W BROWN STEAM UNIT I	70-S3	•	(5)	3,329,621.65	3,339	0
	E W BROWN STEAM UNIT 2	70-S3	*	(5)	997,856.05	637	0
	E W BROWN STEAM UNIT 3	70-S3	*	(5)	5,145,132.14	3,097	0
	PINEVILL UNIT 3	70-S3	*	(5)	4,091.00	0	0
	GHENT UNIT I SCRUBBER GHENT UNIT I	70-S3 70-S3		(5)	3,016,784.00	7,766	0
	GHENT UNIT 2	70-S3 70-S3		(5) (5)	7,641,004.90 10,785,959.00	2,958 3,080	0
	GHENT UNIT 3	70-S3	*	(5)	25,961,222.00	48,662	0
	GHENT UNIT 4	70-S3	٠	(5)	21,911,934.44	38,805	0
	TOTAL ACCOUNT 315 - ACCESSORY ELECTRIC EQUIPMENT				82,078,830.45	109,365	0
316.00	MISCELLANEOUS PLANT EQUIPMENT						
	TYRONE UNIT 3	70-R1.5	*	0	508,751.25	0	0
	TYRONE UNITS 1 & 2	70-R1.5	*	0	59,096.15	0	0
	GREEN RIVER UNIT 3	70-R1.5	•	0	153,389.71	0	0
	GREEN RIVER UNIT 4	70-R1.5	*	0	2,096,051.79	0	0
	GREEN RIVER UNITS 1 & 2	70-R1.5	*	0	84,747.63	0	0
	E W BROWN STEAM UNIT 1	70-R1.5	*	0	424,040.93	0	0
	E W BROWN STEAM UNIT 2	70-R1.5	•	0	85,648.00	0	0
	E W BROWN STEAM UNIT 3	70-R1.5		0	4,233,635.79	0	0
	PINEVILL UNIT 3 GHENT UNIT 1 SCRUBBER	70-R1.5 70-R1.5		0	56,611.00 985,410.00	0	0
	GHENT UNIT I	70-R1.5		0	1,756,976.98	0	0
	GHENT UNIT 2	70-R1.5	*	0	1,493,092.78	0	0
	GHENT UNIT 3	70-R1.5	*	Ö	3,118,291.77	o	0
	GHENT UNIT 4	70-R1.5	*	0	6,052,103.27	0	0
	SYSTEM LABORATORY	70-R1.5	*	0	2,198,264.39	0	0
	TOTAL ACCOUNT 316 - MISCELLANEOUS PLANT EQUIPMENT				23,306,111 44	0	0
	TOTAL STEAM PRODUCTION PLANT				1,508,477,404.52	8,203,793	(1,006,018)
	HYDROELECTRIC PRODUCTION PLANT						
330.10	LAND AND LAND RIGHTS	100 D4		0	970 711 47	0	0
	DIX DAM	100-R4		v	879,311.47	0	0
	TOTAL ACCOUNT 330 1 - LAND RIGHTS				879,311.47	0	0
331.00	STRUCTURES AND IMPROVEMENTS DIX DAM	90-82.5	٠	(5)	453,195.00	490	0
	TOTAL ACCOUNT 331 - STRUCTURES AND IMPROVEMENTS				453,195.00	490	0
332.00	RESERVOIRS, DAMS & WATERWAY DIX DAM	100-S2.5	•	0	7,954,452.04	0	0
	TOTAL ACCOUNT 332 - RESERVOIRS, DAMS & WATERWAYS				7,954,452.04	0	0
333.00	WATER WHEELS, TURBINES & GENERATORS DIX DAM	80-R3	*	(10)	420,536.56	567	(121)
	TOTAL ACCOUNT 333 - WATER WHEELS, TURBINES & GENERATORS	5			420,536.56	567	(121)
334.00	ACCESSORY ELECTRIC EQUIPMENT DIX DAM	40-L2.5	•	0	85,383.14	0	0
	TOTAL ACCOUNT 334 - ACCESSORY ELECTRIC EQUIPMENT				85,383.14	0	0

# FUTURE ANNUAL COST OF REMOVAL AND GROSS SALVAGE AS OF DECEMBER 31, 2006 $\,$

MISCELLANEOUS POWER PLANT EQUIPMENT   DIX DAM   35.LL   0   101,512.96   0   0   0   0   0   0   0   0   0		ACCOUNT	SURVIVOR CURVE		NET ALVAGE ERCENT	ORIGINAL COST	COST OF REMOVAL ACCRUAL AMOUNT	GROSS SALVAGE ACCRUAL AMOUNT
DIX DAM		(1)	(2)	_	(3)	(4)	(5)	(6)
TOTAL ACCOUNT 336 - ROADS, RAILROADS & BRIDGES   DIX DAM	335.00	•	35-L1		0	101,512.96	. 0	0
DIX DAM		TOTAL ACCOUNT 335 - MISCELLANEOUS POWER PLANT EQUIP	MENT			101,512.96	0	0
DIX DAM	336.00	ROADS, RAILROADS, & BRIDGES						
TOTAL HYDROELECTRIC PRODUCTION PLANT			55-R4	•	0	46,976.13	0	0
Add   10   LAND RIGHTS   E W BROWN CT UNIT 9 GAS PIPE   30-R0.5   0   176,409.31   0   0   0   0   0   0   0   0   0		TOTAL ACCOUNT 336 - ROADS, RAILROADS & BRIDGES				46,976.13	0	0
LAND RIGHTS   E W BROWN CT UNIT 9 GAS PIPE   30-R0.5   0   176,409.31   0   0   0		TOTAL HYDROELECTRIC PRODUCTION PLANT				9,941,367.30	1,057	(121)
E W BROWN CT UNIT 9 GAS PIPE  10.0 STRUCTURES AND IMPROVEMENTS  PADDY'S RUN GENERATOR 13		OTHER PRODUCTION PLANT	_					
E W BROWN CT UNIT 9 GAS PIPE  10.0 STRUCTURES AND IMPROVEMENTS  PADDY'S RUN GENERATOR 13	340.10	I AND RIGHTS						
STRUCTURES AND IMPROVEMENTS	340.10		30-R0.5	•	0	176,409.31	0	0
PADDY'S RING GENERATOR   13		TOTAL ACCOUNT 340 I - LAND RIGHTS				176,409.31	0	0
E W BROWN CT UNIT 5	341.00	STRUCTURES AND IMPROVEMENTS						
E W BROWN CT LINIT 6  E W BROWN CT LINIT 7  40-R2.5  E W BROWN CT LINIT 7  40-R2.5  E W BROWN CT LINIT 8  40-R2.5  E W BROWN CT LINIT 9  E W BROWN CT LINIT 10  E W BROWN CT LINIT 10  E W BROWN CT LINIT 10  E W BROWN CT LINIT 11  40-R2.5  E W BROWN CT LINIT 10  E W BROWN CT LINIT 16  40-R2.5  E W BROWN CT LINIT 16  40-R2.5  E W BROWN CT LINIT 17  40-R2.5  E W BROWN CT LINIT 8  40-R2.5  E W BROWN CT LINIT 9  40-R2.5  E W BROWN CT LINIT 9  40-R2.5  E W BROWN CT LINIT 9  E				*				
E W BROWN CT UNIT 7				*				
E W BROWN CT UNIT 8  E W BROWN CT UNIT 9  E W BROWN CT UNIT 9  E W BROWN CT UNIT 10  E W BROWN CT UNIT 10  E W BROWN CT UNIT 10  E W BROWN CT UNIT 11  E W BROWN CT UNIT 11  A0-R2.5 • 0 1,858,718.54 0 0 0  E W BROWN CT UNIT 11  A0-R2.5 • 0 1,858,734.33 0 0 0  TRIMBLE COUNTY CT UNIT 5 40-R2.5 • 0 3,588,684.33 0 0 0  TRIMBLE COUNTY CT UNIT 6 40-R2.5 • 0 3,588,684.33 0 0 0  TRIMBLE COUNTY CT UNIT 8 40-R2.5 • 0 3,588,684.33 0 0 0  TRIMBLE COUNTY CT UNIT 8 40-R2.5 • 0 3,588,684.33 0 0 0  TRIMBLE COUNTY CT UNIT 8 40-R2.5 • 0 3,588,684.33 0 0 0  TRIMBLE COUNTY CT UNIT 9 40-R2.5 • 0 3,588,684.33 0 0 0  TRIMBLE COUNTY CT UNIT 9 40-R2.5 • 0 3,585,976.41 0 0 0  TRIMBLE COUNTY CT UNIT 10 40-R2.5 • 0 3,655,976.41 0 0 0  TRIMBLE COUNTY CT UNIT 10 40-R2.5 • 0 3,653,029.99 0 0 0  HAEFLING UNITS 1, 2 & 3 40-R2.5 • 0 3,653,029.99 0 0 0  TOTAL ACCOUNT 341 - STRUCTURES AND IMPROVEMENTS  32,000  FUEL HOLDERS, PRODUCERS AND ACCESSORIES  PADDY'S RUN GENERATOR 13 45-R2.5 • (5) 1,995,102.07 3,686 0 0  E W BROWN CT UNIT 5 45-R2.5 • (5) 12,995,102.07 3,686 0 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 12,995,102.07 0 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 145,745.00 270 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 145,745.00 270 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 1,932,186.25 3,743 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 1,932,186.25 3,743 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 1,932,186.25 3,743 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 1,932,186.25 3,743 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 1,932,186.25 3,743 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 1,932,186.25 3,743 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 1,932,186.25 3,743 0  FIRMBLE COUNTY CT WITH 8 45-R2.5 • (5) 1,932,186.25 3,743 0  FIRMBLE COUNTY CT WITH 8 45-R2.5 • (5) 1,932,186.25 3,743 0  FIRMBLE COUNTY CT WITH 6 45-R2.5 • (5) 1,932,186.25 3,743 0  FIRMBLE COUNTY CT WITH 6 45-R2.5 • (5) 1,932,186.25 3,743 0  FIRMBLE COUNTY CT WITH 6 45-R2.5 • (5) 1,932,186.25 3,743 0  FIRMBLE COUNTY CT WITH 6 45-R2.5 • (5) 1,932,186.25 3,743 0  FIRMBLE COUNTY CT WITH 6 45-R2.5 • (5) 1,932,186.25 3,743 0  FIRMBLE COUNTY CT WI				*				
E W BROWN CT UNIT 9				:				
E W BROWN CT UNIT 10  E W BROWN CT UNIT 11  40-R2.5 • 0 1.885,718.54 0 0 0  TRIMBLE COUNTY CT UNIT 5 40-R2.5 • 0 3,740,231.26 0 0 0  TRIMBLE COUNTY CT UNIT 6 40-R2.5 • 0 3,740,231.26 0 0 0  TRIMBLE COUNTY CT UNIT 7 40-R2.5 • 0 3,758,684.33 0 0 0  TRIMBLE COUNTY CT UNIT 7 40-R2.5 • 0 3,758,684.33 0 0 0  TRIMBLE COUNTY CT UNIT 8 40-R2.5 • 0 3,559,154.97 0 0  TRIMBLE COUNTY CT UNIT 9 40-R2.5 • 0 3,559,154.97 0 0  TRIMBLE COUNTY CT UNIT 9 40-R2.5 • 0 3,559,964.1 0 0  TRIMBLE COUNTY CT UNIT 10 40-R2.5 • 0 3,653,976.41 0 0  TRIMBLE COUNTY CT UNIT 10 40-R2.5 • 0 3,653,909.99 0 0 0  HAEFLING INITS 1, 2 & 3 40-R2.5 • 0 3,653,909.99 0 0 0  TOTAL ACCOUNT 341 - STRUCTURES AND IMPROVEMENTS  PADDY'S RUN GENERATOR 13 45-R2.5 • (5) 1,995,102.07 3,686 0  E W BROWN CT UNIT 5 45-R2.5 • (5) 1,995,102.07 3,686 0  E W BROWN CT UNIT 6 45-R2.5 • (5) 177,229.00 1,345 0  E W BROWN CT UNIT 7 45-R2.5 • (5) 145,115.00 271 0  E W BROWN CT UNIT 7 45-R2.5 • (5) 145,115.00 271 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 145,115.00 270 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 1,995,102.03 38 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  E W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 • (5) 1,951,100 38 0  F W BROWN CT UNIT 9 45-R2.5 •				*				
E W BROWN CT UNIT 11				*				
TRIMBLE COUNTY CT UNIT 6				*			-	
TRIMBLE COUNTY CT UNIT 8				•	0		0	
TRIMBLE COUNTY CT UNIT 8		TRIMBLE COUNTY CT UNIT 6	40-R2.5	•	0	3,588,684.33	0	0
TRIMBLE COUNTY CT UNIT 9		TRIMBLE COUNTY CT UNIT 7				3,559,154.97		
TRIMBLE COUNTY CT UNIT 10							-	
HAEFLING UNITS 1, 2 & 3  ### AUTOPAL ACCOUNT 341 - STRUCTURES AND IMPROVEMENTS  ### FUEL HOLDERS, PRODUCERS AND ACCESSORIES  FUEL HOLDERS, PRODUCERS AND ACCESSORIES  ### PADDY'S RUN GENERATOR 13  ### 45-R2.5  ### W BROWN CT UNIT 5  ### W BROWN CT UNIT 6  ### W BROWN CT UNIT 7  ### W BROWN CT UNIT 8  ### W BROWN CT UNIT 9  ### W BROWN CT UNIT 10  ### W BROWN CT UNIT 11  ### W BROWN CT UNIT 11  ### W BROWN CT UNIT 19  ### W BROWN CT UNIT 10  ### W BROWN CT UNIT 10								
FUEL HOLDERS, PRODUCERS AND ACCESSORIES  PADDY'S RUN GENERATOR 13  45-R2.5 * (5)  E W BROWN CT UNIT 5  E W BROWN CT UNIT 6  E W BROWN CT UNIT 7  E W BROWN CT UNIT 7  E W BROWN CT UNIT 8  E W BROWN CT UNIT 8  E W BROWN CT UNIT 9  E W BROWN CT UNIT 10  E W BROWN CT UNIT 10  E W BROWN CT UNIT 11  E W BROWN CT UNIT 15  E W BROWN CT UNIT 6  E W BROWN CT UNIT 7  E W BROWN CT UNIT 8  E W BROWN CT UNIT 8  E W BROWN CT UNIT 9  E W BROWN CT UNIT 9  E W BROWN CT UNIT 10  E W				•				
PADDY'S RUN GENERATOR I3  E W BROWN CT UNIT 5  E W BROWN CT UNIT 6  E W BROWN CT UNIT 6  E W BROWN CT UNIT 7  E W BROWN CT UNIT 8  E W BROWN CT UNIT 9  E W BROWN CT UNIT 10  E W BROWN CT UNIT 10  E W BROWN CT UNIT 11  E W BROWN CT UNIT 15  E W BROWN CT UNIT 6  E W BROWN CT UNIT 6  E W BROWN CT UNIT 6  E W BROWN CT UNIT 9 GAS PIPE  E W BROWN CT UNIT 6  E W BROWN CT UNIT 7  B S-RI  S-RI  S-RI  S-RI  S-RI  S-RI  S-RI S-RI		TOTAL ACCOUNT 341 - STRUCTURES AND IMPROVEMENTS				35,982,153.69	0	0
E W BROWN CT UNIT 5 E W BROWN CT UNIT 6 E W BROWN CT UNIT 6 E W BROWN CT UNIT 6 E W BROWN CT UNIT 7 E W BROWN CT UNIT 7 E W BROWN CT UNIT 7 E W BROWN CT UNIT 8 E W BROWN CT UNIT 8 E W BROWN CT UNIT 8 E W BROWN CT UNIT 9 E W BROWN CT UNIT 9 E W BROWN CT UNIT 9 E W BROWN CT UNIT 10 E W BROWN CT UNIT 10 E W BROWN CT UNIT 11 E W BROWN CT UNIT 11 E W BROWN CT UNIT 11 E W BROWN CT UNIT 15 E W BROWN CT UNIT 15 E W BROWN CT UNIT 16 E W BROWN CT UNIT 17 E W BROWN CT UNIT 18 E W BROWN CT UNIT 19 E W BROWN CT UNIT 19 E W BROWN CT UNIT 19 E W BROWN CT UNIT 5 E W BROWN CT UNIT 6 E W BROWN CT UNIT 7 E W BROWN CT UNIT 7 E W BROWN CT UNIT 7 E W BROWN CT UNIT 8 E W BROWN CT UNIT 9 E W BROWN CT UNIT 9 E W BROWN CT UNIT 9 E W BROWN CT UNIT 10	342.00	FUEL HOLDERS, PRODUCERS AND ACCESSORIES						
E W BROWN CT UNIT 6		PADDY'S RUN GENERATOR 13						
E W BROWN CT UNIT 7							-	
E W BROWN CT UNIT 8								
E W BROWN CT UNIT 9								
E W BROWN CT UNIT 10								
E W BROWN CT UNIT 11								-
E W BROWN CT UNIT 9 GAS PIPE								
TRIMBLE COUNTY CT UNIT 6				*				
TRIMBLE COUNTY CT PIPELINE 45-R2.5 * (5) 4,850,114.45 8,933 0 TRIMBLE COUNTY CT UNIT 7 45-R2.5 * (5) 578,059.38 1,059 0 TRIMBLE COUNTY CT UNIT 8 45-R2.5 * (5) 576,385.74 1,056 0 TRIMBLE COUNTY CT UNIT 9 45-R2.5 * (5) 593,360.1 1,088 0 TRIMBLE COUNTY CT UNIT 10 45-R2.5 * (5) 593,307.31 1,087 0 HAEFLING UNITS 1, 2 & 3 45-R2.5 * (5) 181,132.00 0 0  TOTAL ACCOUNT 342 - FULE HOLDERS, PRODUCERS AND ACCESSORIES 21,009,004.64 39,271 0  PRIME MOVERS PADDY'S RUN GENERATOR 13 35-R1 * (5) 17,420,148.57 36,591 0 E W BROWN CT UNIT 5 35-R1 * (5) 13,164,181.28 27,166 0 E W BROWN CT UNIT 6 35-R1 * (5) 30,399,242.38 62,015 0 E W BROWN CT UNIT 7 35-R1 * (5) 30,001,197.85 63,561 0 E W BROWN CT UNIT 8 35-R1 * (5) 20,074,864.20 41,683 0 E W BROWN CT UNIT 9 35-R1 * (5) 20,074,864.20 41,683 0 E W BROWN CT UNIT 9 35-R1 * (5) 20,074,864.20 41,683 0		TRIMBLE COUNTY CT UNIT 5	45-R2.5	*		239,584.64	442	0
TRIMBLE COUNTY CT UNIT 7		TRIMBLE COUNTY CT UNIT 6	45-R2.5	*	(5)	239,245.94		
TRIMBLE COUNTY CT UNIT 8				*				
TRIMBLE COUNTY CT UNIT 9				*				
TRIMBLE COUNTY CT UNIT 10				•				
HAEFLING UNITS 1, 2 & 3 45-R2.5 * (5) 181,132.00 0 0  TOTAL ACCOUNT 342 - FULE HOLDERS, PRODUCERS AND ACCESSORIES 21,009,004.64 39,271 0  PRIME MOVERS  PADDY'S RUN GENERATOR 13 35-R1 * (5) 17,420,148.57 36,591 0  E W BROWN CT UNIT 5 35-R1 * (5) 13,164,181.28 27,166 0  E W BROWN CT UNIT 6 35-R1 * (5) 30,399,242.38 62,015 0  E W BROWN CT UNIT 7 35-R1 * (5) 30,001,197.85 63,561 0  E W BROWN CT UNIT 8 35-R1 * (5) 20,074,864.20 41,683 0  E W BROWN CT UNIT 9 35-R1 * (5) 21,502,645.45 46,934 0						·		
343.00 PRIME MOVERS PADDY'S RUN GENERATOR 13 35-R1 * (5) 17,420,148.57 36,591 0 E W BROWN CT UNIT 5 35-R1 * (5) 13,164,181.28 27,166 0 E W BROWN CT UNIT 6 35-R1 * (5) 30,399,242.38 62,015 0 E W BROWN CT UNIT 7 35-R1 * (5) 30,001,197.85 63,561 0 E W BROWN CT UNIT 8 35-R1 * (5) 20,074,864.20 41,683 0 E W BROWN CT UNIT 9 35-R1 * (5) 21,502,645 45 46,934 0								
PADDY'S RUN GENERATOR 13 35-R1 * (5) 17,420,148.57 36,591 0 E W BROWN CT UNIT 5 35-R1 * (5) 13,164,181.28 27,166 0 E W BROWN CT UNIT 6 35-R1 * (5) 30,399,242.38 62,015 0 E W BROWN CT UNIT 7 35-R1 * (5) 30,001,197.85 63,561 0 E W BROWN CT UNIT 8 35-R1 * (5) 20,074,864.20 41,683 0 E W BROWN CT UNIT 9 35-R1 * (5) 21,502,645.45 46,934 0		TOTAL ACCOUNT 342 - FULE HOLDERS, PRODUCERS AND ACC	CESSORIES			21,009,004.64	39,271	0
E W BROWN CT UNIT 5 35-R1 * (5) 13,164,181.28 27,166 0  E W BROWN CT UNIT 6 35-R1 * (5) 30,399,242.38 62,015 0  E W BROWN CT UNIT 7 35-R1 * (5) 30,001,197.85 63,561 0  E W BROWN CT UNIT 8 35-R1 * (5) 20,074,864.20 41,683 0  E W BROWN CT UNIT 9 35-R1 * (5) 21,502,645.45 46,934 0	343.00		76.75		(E)	17 430 140 0**	26.801	^
E W BROWN CT UNIT 6 35-R1 * (5) 30,399,242.38 62,015 0 E W BROWN CT UNIT 7 35-R1 * (5) 30,001,197.85 63,561 0 E W BROWN CT UNIT 8 35-R1 * (5) 20,074,864.20 41,683 0 E W BROWN CT UNIT 9 35-R1 * (5) 21,502,645.45 46,934 0								
E W BROWN CT UNIT 7 35-R1 • (5) 30,001,197.85 63,561 0 E W BROWN CT UNIT 8 35-R1 • (5) 20,074,864.20 41,683 0 E W BROWN CT UNIT 9 35-R1 • (5) 21,502,645.45 46,934 0								
E W BROWN CT UNIT 8 35-R1 * (5) 20,074,864.20 41,683 0 E W BROWN CT UNIT 9 35-R1 • (5) 21,502,645.45 46,934 0				•				
E W BROWN CT UNIT 9 35-R1 • (5) 21,502,645 45 46,934 0				*				
				•				
			35-R1	٠		19,670,647.49		0

# FUTURE ANNUAL COST OF REMOVAL AND GROSS SALVAGE AS OF DECEMBER 31, 2006

	ACCOUNT (1)	SURVIVOR CURVE (2)		NET SALVAGE PERCENT (3)	ORIGINAL COST (4)	COST OF REMOVAL ACCRUAL AMOUNT (5)	GROSS SALVAGE ACCRUAL AMOUNT (6)
	ζ-,	ζ-,		` ,	( )	. ,	` '
	E W BROWN CT UNIT 11	35-R1	•	(5)	34,239,853.35	72,967	0
	TRIMBLE COUNTY CT UNIT 5	35-R1	*	(5)	30,530,609.97	63,256	0
	TRIMBLE COUNTY CT UNIT 6	35-R1	*	(5)	30,442,270.01	63,154	0
	TRIMBLE COUNTY CT UNIT 7	35-R1	*	(5)	22,773,833.23	46,566	0
	TRIMBLE COUNTY CT UNIT 8 TRIMBLE COUNTY CT UNIT 9	35-R1 35-R1		(5)	22,568,286.07	46,195 45,853	0 0
	TRIMBLE COUNTY CT UNIT 10	35-R1		(5) (5)	22,401,685.39 22,378,127.55	45,855	0
	TOTAL ACCOUNT 343 - PRIME MOVERS				337,567,592.79	704,628	0
344.00	GENERATORS						
344.00	PADDY'S RUN GENERATOR 13	55-S3	*	(5)	5,185,636.00	10,827	(1,547)
	E W BROWN CT UNIT 5	55-S3		(5)	2,831,528.00	5,912	(845)
	E W BROWN CT UNIT 6	55-S3	*	(5)	3,712,349.00	7,362	(1,104)
	E W BROWN CT UNIT 7	55-S3	•	(5)	3,722,788.00	7,383	(1,107)
	E W BROWN CT UNIT 8	55-S3	*	(5)	4,953,961.00	10,259	(1,466)
	E W BROWN CT UNIT 9	55-S3	*	(5)	5,452,041.03	11,231	(1,604)
	E W BROWN CT UNIT 10	55-S3	*	(5)	4,944,693.00	10,239	(1,463)
	E W BROWN CT UNIT 11	55-S3	*	(5)	5,187,040.00	10,767	(1,538)
	TRIMBLE COUNTY CT UNIT 5	55-S3	*	(5)	3,763,274.68	7,861	(1,123)
	TRIMBLE COUNTY CT UNIT 6	55-S3	•	(5)	3,757,946.86	7,850	(1,121)
	TRIMBLE COUNTY CT UNIT 7	55-S3	*	(5)	2,950,282.37	5,886	(883)
	TRIMBLE COUNTY CT UNIT 8	55-S3	*	(5)	2,937,930.22	5,861	(879)
	TRIMBLE COUNTY CT UNIT 9	55-S3	*	(5)	2,957,520.12	5,900	(885)
	TRIMBLE COUNTY CT UNIT 10 HAEFLING UNITS 1, 2 & 3	55-S3 55-S3		(5) (5)	2,954,148.53 4,023,003.00	5,893 0	(884) 0
	TOTAL ACCOUNT 344 - GENERATORS			(-)	59,334,141 81	113,231	(16,449)
345.00	ACCESSORY ELECTRIC EQUIPMENT						
343.00	PADDY'S RUN GENERATOR 13	45-R3	٠	0	2,456,320.00	0	0
	E W BROWN CT UNIT 5	45-R3	*	0	1,332,167.00	0	0
	E W BROWN CT UNIT 6	45-R3		0	1,354,817.00	0	0
	E W BROWN CT UNIT 7	45-R3	*	0	1,347,700.00	0	0
	E W BROWN CT UNIT 8	45-R3	*	0	1,797,054.00	0	0
	E W BROWN CT UNIT 9	45-R3	*	0	3,226,185.73	0	0
	E W BROWN CT UNIT 10	45-R3	*	0	1,804,419.00	0	0
	E W BROWN CT UNIT 11	45-R3	*	0	916,326.00	0	0
	TRIMBLE COUNTY CT UNIT 5	45-R3	*	0	1,677,092.15	0	0
	TRIMBLE COUNTY CT UNIT 6	45-R3	*	0	1,674,719.12	0	0
	TRIMBLE COUNTY CT UNIT 7	45-R3	*	0	3,146,235.12	0	0
	TRIMBLE COUNTY CT UNIT 8	45-R3	٠	0	3,137,127.45	0	0
	TRIMBLE COUNTY CT UNIT 9	45-R3	*	0	3,231,827.28	0	0
	TRIMBLE COUNTY CT UNIT 10	45-R3	*	0	3,229,222.72	0	0
	HAEFLING UNITS 1, 2 & 3	45-R3	•	0	621,207.00	0	0
	TOTAL ACCOUNT 345 - ACCESSORY ELECTRIC EQUIPMENT				30,952,419.57	0	0
346.00	MISCELLANEOUS PLANT EQUIPMENT						
	PADDY'S RUN GENERATOR 13	35-R2	*	0	1,089,549.00	0	0
	E W BROWN CT UNIT 5	35-R2	•	0	2,108,910.25	0	0
	E W BROWN CT UNIT 6	35-R2	*	0	48,958.88	0	0
	E W BROWN CT UNIT 7	35-R2	*	0	35,647.85	0	0
	E W BROWN CT UNIT 8	35-R2	*	0	230,069.23	0	0
	E W BROWN CT UNIT 9	35-R2	*	0	760,256.23	0	0
	E W BROWN CT UNIT 10	35-R2	*	0	274,390.79	0	0
	E W BROWN CT UNIT 11	35-R2		0	548,588.10	0	0
	TRIMBLE COUNTY CT UNIT 5	35-R2	•	0	15,274.16	0	0
	TRIMBLE COUNTY CT UNIT 7	35-R2		0	8,888.93	0	0
	TRIMBLE COUNTY CT UNIT 8	35-R2	*	0	8,861.01	0	0
	TRIMBLE COUNTY CT UNIT 9	35-R2	-	. 0	9,113.52	0	0
	TRIMBLE COUNTY CT UNIT 10 HAEFLING UNITS 1, 2 & 3	35-R2 35-R2	*	0	9,105.52 35,805.00	0	0
	TOTAL ACCOUNT 346 - MISCELLANEOUS PLANT EQUIPMENT			•	5,183,418.47	0	0
	TOTAL OTHER PRODUCTION PLANT				490,205,140.28	857,131	(16,449)

# FUTURE ANNUAL COST OF REMOVAL AND GROSS SALVAGE AS OF DECEMBER 31, 2006 $\,$

	ACCOUNT (1)	SURVIVOR CURVE (2)	NET SALVAGE PERCENT (3)	ORIGINAL COST (4)	COST OF REMOVAL ACCRUAL AMOUNT (5)	GROSS SALVAGE ACCRUAL AMOUNT (6)
	(*)	(-)	(0)	(4)	(5)	(0)
	TRANSMISSION PLANT					
350.10	LAND AND LAND RIGHTS	60-R3	0	23,341,455.00	0	0
352.10	STRUCTURES & IMPROVEMENTS-NON SYS CONTROL/COM	65-S2.5	(25)	6,979,653.25	29,455	0
352.20	STRUCTURES & IMPROVEMENTS - SYS CONTROL/COM	60-R3	(25)	1,167,783.17	4,222	ő
353.10	STATION EQUIPMENT - NON SYS CONTROL/COM	60-R2	(20)	173,142,340.90	668,800	(236,867)
353.20	STATION EQUIPMENT - SYS CONTROL/COM	30-R2.5	(20)	14,749,280.69	17,234	(4,924)
354.00	TOWERS AND FIXTURES	70-R4	(25)	63,308,079.23	234,364	(58,591)
355.00	POLES AND FIXTURES	50-R2	(60)	91,302,830 77	878,639	(200,015)
356.00	OVERHEAD CONDUCTORS AND DEVICES	60-R3	(50)	129,755,652.44	827,136	(249,274)
357.00	UNDERGROUND CONDUIT	40-L2.5	0	448,760.26	0	0
358.00	UNDERGROUND CONDUCTORS AND DEVICES	35-R3	0	1,114,761.90	0	0
	TOTAL TRANSMISSION PLANT			505,310,597.61	2,659,849	(749,671)
	DISTRIBUTION PLANT					
240.10	A AND AND A AND DIGHTS	(5 D4		1 104 103 74	•	
360.10	LAND AND LAND RIGHTS	65-R4	0	1,496,173.36	0	0
361.00	STRUCTURES AND IMPROVMENTS	60-R2.5	(10)	4,457,893.55	10,697	0
362 00	STATION EQUIPMENT	52-R2	(15)	100,792,637.54	390,444	(113,879)
364.00 365.00	POLES, TOWERS, AND FIXTURES OVERHEAD CONDUCTORS AND DEVICES	48-S0 48-R2	(45)	193,793,678.56	1,527,422 1,926,012	(288,972)
366.00	UNDERGOUND CONDUIT	55-S4	(75) 0	180,861,758.25	1,926,012	(333,070)
367.00	UNDERGROUND CONDUCTORS AND DEVICES	44-S0.5	(5)	1,728,495.59 70,302,254.23	92,565	0
368.00	LINE TRANSFORMERS	40-R2	(20)	238,783,304.20	1,658,825	(135,021)
369.00	SERVICES	43-R1.5	(30)	83,111,706.05	334,516	(155,021)
370.00	METERS	40-R1.5	0	64,856,075.30	0 0	0
371.00	INSTALLATIONS ON CUSTOMER PREMISES	20-R0.5	(10)	18,276,458.22	49,784	0
373.00	STREET LIGHTING AND SIGNAL SYSTEMS	33-R1	(5)	53,640,293.35	77,744	(7,774)
	TOTAL DISTRIBUTION PLANT			1,012,100,728.20	6,068,008	(878,716)
	GENERAL PLANT					
390 10	STRUCTURES AND IMPROVEMENTS-TO OWNED PROPERTY	60-S0	(5)	32,199,743.43	34,759	0
390.20	STRUCTURES AND IMPROVEMENTS - LEASED PROPERTY	30-R1	(5)	531,973.44	856	0
391.10	OFFICE FURNITURE AND EQUIPMENT	20-SQ	0	6,646,812.13	. 0	0
391.20	NON PC COMPUTER EQUIPMENT	5-SQ	0	11,291,984.97	0	0
391.30	CASH PROCESSING EQUIPMENT	10-SQ	0	817,574.88	0	0
391.40	PERSONAL COMPUTER EQUIPMENT	4-SQ	0	1,932,338.58	0	0
393.00	STORES EQUIPMENT	25-SQ	0	738,677.31	0	0
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	0	5,333,517.39	0	0
395.00	LABORATORY EQUIPMENT	15-SQ	0	3,202,201.94	0	0
396.00	POWER OPERATED EQUIPMENT	17-R5	Ü	270,941.73	0	0
397.10	COMMUNICATION EQUIPMENT - CARRIER	15-SQ	0 0	7,578,905.59	0	0
397 20	COMMUNICATION EQUIPMENT - REMOTE CONTROL	15-SQ 15-SQ	0	3,913,059.76 4,659,773.21	0	0
397.30 398.00	COMMUNICATION EQUIPMENT - MOBILE MISCELLANEOUS EQUIPMENT	13-SQ 10-SQ	0	394,808.70	0	0
378.00	•	10-30	J			
	TOTAL GENERAL PLANT			79,512,313.06	35,615	0
	TOTAL DEPRECIABLE PLANT			3,605,547,550.97	17,825,453	(2,650,975)

# FUTURE ANNUAL COST OF REMOVAL AND GROSS SALVAGE AS OF DECEMBER 31, 2006

			NUMBER		COST OF	GROSS
		011010100	NET	onion	REMOVAL	SALVAGE
	AGGOVINI	SURVIVOR	SALVAGE	ORIGINAL	ACCRUAL	ACCRUAL
	ACCOUNT	CURVE	PERCENT	COST	AMOUNT	AMOUNT
	(1)	(2)	(3)	(4)	(5)	(6)
	NONDEPRECIABLE PLANT					
301.00	ORGANIZATION			44,455.58		
302.00	FRANCHISE AND CONSENTS			83,453.04		
303.00	MISCELLANEOUS INTANGIBLE PLANT			25,522,749.20		
310.10	LAND			10,478,524.56		
340.10	LAND			118,514.41		
350.10	LAND			1,168,238.43		
360.10	LAND			1,744,769.88		
389.10	LAND			2,811,100.83		
	TOTAL NONDEPRECIABLE PLANT			41,971,805.93		
	ACCOUNTS NOT STUDIED					
392.00	TRANSPORTATION EQUIPMENT			23,860,353,39		
	TOTAL ACCOUNTS NOT STUDIED			23,860,353.39		
	TOTAL ELECTRIC PLANT			3,671,379,710.29		

<sup>\*</sup> LIFE SPAN PROCEDURE IS USED. CURVE SHOWN IS INTERIM SURVIVOR CURVE

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 175

Responding Witness: Shannon L. Charnas

- Q-175. Are the amounts of cost of removal and gross salvage incorporated into the existing and proposed depreciation rates the same as they would have been in the absence of SFAS No. 143 and FIN 47? Please explain.
- A-175. The amounts of cost of removal and gross salvage incorporated into the existing and proposed depreciation rates are the same as they would have been in the absence of SFAS No. 143 and FIN 47.

All of the cost of removal and gross salvage recorded on the books and developed into the depreciation rates are costs associated with normal business in the utility industry.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# **Question No. 176**

- Q-176. With respect to the Regulatory Liability relating to cost of removal obligations which KU reclassified out of accumulated depreciation:
  - a. Do you agree that this constitutes a regulatory liability for regulatory purposes in Kentucky? If not, please explain why not.
  - b. Do you agree that this amount is a refundable obligation to ratepayers until it is spent on its intended purpose (cost of removal)? If not, why not?
  - c. Please explain the repayment provisions associated with this regulatory liability.
  - d. Please explain when you expect to spend this money for cost of removal.
  - e. Please explain what you have done with this money as you have collected it. If you say that you have spent it on plant additions, please provide documentation.
  - f. Identify and explain all other similar examples of KU's advance collections of estimated future costs for which it does not have a legal obligation.
  - g. Does KU agree that the PSC will never know whether or not KU will actually spend all of this money for cost of removal until and if KU goes out of business? If not, why not?
  - h. Does KU believe that amounts recoded in accumulated depreciation represent capital recovery? If not, why not?
  - i. Whose capital is reflected in accumulated depreciation shareholders' or ratepayers'?

- A-176. a. No. The regulatory liability relating to cost of removal does not constitute a regulatory liability for regulatory purposes in Kentucky. These amounts were reclassified out of accumulated depreciation for external reporting purposes under U.S. generally accepted accounting principles. In FERC Order 631 (Docket No. RM02-7-000), which addresses retirement obligations, the FERC stated, "Under the existing requirements of the Uniform System of Accounts removal costs that are not asset retirement obligations are included as a component of the depreciation expense and recorded as accumulated depreciation." Therefore, this amount is not a regulatory liability for regulatory purposes in Kentucky.
  - b. No. The amount was collected based upon Commission approved depreciation rates which were designed to recover the cost of removing assets in the future from the ratepayers that benefit from those assets. Also, for regulatory purposes in Kentucky it is a component of depreciation expense and is recorded in accumulated depreciation, not as a regulatory liability.
  - c. There are no repayment provisions for this since it is not a regulatory liability for regulatory purposes in Kentucky.
  - d. The money is spent as assets are removed, either by replacement or retirement.
  - e. Amounts collected for cost of removal are recorded based on depreciation rates approved by the Commission. Since these rates have gone into the calculation of base rates charged to the customers, it is theoretically being collected from the customers along with all other costs and is not separately tracked. As with all other amounts collected from the customer, it has been used in the operations of the Company.
  - f. Cost of removal is recognized as a current period cost in accumulated depreciation to address generational inequities that might otherwise arise due to the long lives of utility assets.
  - g. No. The cost of removal component of depreciation rates is adjusted, if necessary, when periodic depreciation studies are completed. The Commission may periodically require depreciation studies to ensure the costs included in the approved depreciation rates are appropriately aligned with the expected lives of the assets and the costs to ultimately remove those assets. The FERC also requires separate records for cost of removal for non-legal asset retirement obligations recorded in accumulated depreciation per the Uniform System of Accounts and Order No. 631. These detailed records will allow the cost of removal expenditures to be monitored

- h. No. Accumulated depreciation is the net of accrued depreciation, retirements, net salvage proceeds and accrued cost of removal for retirements. Accrued depreciation is a systematic allocation of the cost of assets over their useful lives and therefore conceptually represents recovery of the costs of those assets to the extent depreciation expense is included in the rates charged to the ratepayers.
- i. Accumulated depreciation represents the reduction of the carrying amount of assets owned by the Company and used to provide services to the ratepayers; therefore it reflects the recovery of shareholder's capital.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 177

- Q-177. Does KU commit to remove each asset for which it is collecting cost of removal and does it commit to spend all of the money it is collecting for cost of removal, on cost of removal? If the answer is yes, explain why KU does not have legal AROs under the principal of promissory estoppel. Please explain.
- A-177. The Attorney General misinterprets the concept of promissory estoppel in his questions and the Company, therefore, cannot provide a meaningful answer to the question.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### **Question No. 178**

Responding Witness: Shannon L. Charnas

- Q-178. Does KU consider that it is bound by SEC regulations to record accruals for future costs of removal as regulatory liabilities?
  - a. If so, please provide a record of those accruals in as much account detail as is available along with the workpapers used to develop those accruals.
  - b. If not, please explain why not.
  - c. State whether the Company proposes to separate retirement cost accounting from depreciation accounting with separate rates and reserves. If the Company does not propose such separation, please state fully the reasons for not doing so.
- A-178. KU has deregistered from the SEC and is not bound by SEC regulations.

KU does record cost of removal as a regulatory liability for GAAP reporting. This is in compliance with SFAS No. 143, FIN 47 and the general principles of SFAS No. 71, Accounting for Effects of Certain Types of Regulation.

- a. See response to Question No. 171.
- b. See the answer above.
- c. The Company currently maintains separate rates and reserves for cost of removal and capital recovery.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 179** 

Responding Witness: Shannon L. Charnas

- Q-179. Please identify and describe the level of detail, e.g. by account, functional category, at which the Company computes the depreciation expense for purposes of financial reporting, Commission reporting, and ratemaking. Explain fully any differences among these three depreciation calculations.
- A-179. There are no differences made in computing depreciation expense for financial reporting, Commission reporting, and ratemaking. Depreciation expense is calculated at the plant account level for transmission, distribution, and general plant. Depreciation expense for generation plant is calculated by plant account for each generation unit location.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 180

Responding Witness: Shannon L. Charnas

- Q-180. State whether the Company has forecast any non-legal removal costs that it does not regard as regulatory liabilities. Please describe these costs in detail, state fully the reason(s) for your belief that such forecast costs are not regulatory liabilities, and identify the forecast amounts of such removal costs in as much detail as is available. Provide the supporting documentation for each forecast amount.
- A-180. The Company has not forecast any non-legal removal costs that it does not regard as regulatory liabilities.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### **Question No. 181**

- Q-181. Please provide copies of all presentations made to rating agencies and/or investment firms by KU between January 1, 2009 and the present.
- A-181. Objections are made to the request for the production of documents on the grounds that it seeks the production of documents that are irrelevant to the issues in this case and relate to non-utility activities or hypothetical scenarios based upon projections. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. These non-utility activities and projected information are not relevant to the analysis of known and measurable pro forma adjustments in this case. Without waiver of these objections, the Company provides the documents in the attached CD in folder titled Question No. 181 under seal and pursuant to a petition for confidential treatment.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# **Question No. 182**

- Q-182. Please provide copies of all prospectuses for any security issuances by E.ON AG, E.ON. U.S. LLC, and KU since January 1, 2009.
- A-182. There have been no security issuances by KU or E.ON U.S. LLC since January 1, 2009. E.ON U.S. LLC personnel are not involved in the financing activities of E.ON AG and do not maintain files with the E.ON AG prospectuses.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 183

- Q-183. Please provide copies of all studies performed by KU or by consultants or investment firms hired by KU to assess (1) KU financial performance, (2) the performance of KU relative to other utilities, or (3) the adequacy of KU's return on equity or overall rate of return.
- A-183. See the reports on the attached CD in folder titled Question No. 183.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 184

- Q-184. Please provide copies of credit reports for E.ON AG, E.ON. U.S. LLC, and KU from the major credit rating agencies published since January 1, 2008.
- A-184. The requested rating reports issued since January 1, 2007 are attached on CD in folder titled Question No. 184.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 185

- Q-185. Please provide copies of all correspondence between E.ON AG, E.ON. U.S. LLC, and KU and any of the three major bond rating agencies (S&P, Moody's, and Fitch) from January 1, 2008 to the present. These include copies of letters, reports, presentations, emails, and notes from telephone conversations.
- A-185. Objections are made to the request for the production of documents on the ground that it is overly broad and unduly burdensome and seeks the production of documents that are irrelevant to the issues in this case and documents that relate to hypothetical scenarios. Without waiver of these objections, the Company states as follows KU, LG&E and E.ON U.S. do not have in their possession correspondence between E.ON AG and the bond rating agencies. Employees of KU, LGE or E.ON U.S. do not participate in the ratings of E.ON AG by credit rating agencies. Please see the documents, produced in electronic format, are on the attached CD in folder titled Question No. 185 that have been identified within the time permitted for this response and that are responsive to the request. Please note that the Companies are seeking confidential protection for the documents being provided hereunder pursuant to a petition for confidential protection.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### Question No. 186

- Q-186. Please provide the breakdown in the expected return on pension plan assets. Specifically, please provide the expected return on different assets classes (bonds, US stocks, international stocks, etc.) used in determining the expected return on plan assets. Please provide all associated source documents and workpapers.
- A-186. KU uses return assumptions provided by Mercer on an annual basis in determining the expected return on pension plan assets. Attached are the return assumptions received from Mercer that were used for year- end reporting for 2009, along with the calculation of the expected return for the KU pension plan assets using the Mercer data.

# **Pension Plan Expected Return Calculation**

	Target Allocation	Expected Return*
Domestic Equity	44.4%	9.9%
International Equity	<u>13.1%</u>	<u>9.7%</u>
Total Equity	57.5%	9.85%
Aggregate Fixed Income	26.8%	4.8%
Long Duration	<u>15.7%</u>	<u>5.4%</u>
Total Fixed Income	42.5%	5.02%
Total	100.0%	7.80%

<sup>\*</sup>Expected Returns provided by Mercer on 1/11/2010.

The state of the s		Mean-Variance Assumptions	25ndill		いっている。	けいいえい	のではある。		A DECEMBER	Factor Scores	nes		**************************************		
語のでは大きないというできる。	20-Yr.Ass	20-Yr Assumptions		Shorter Ge	ler Geometric Returns⊹	Returns			Equil	Equity				1	<b></b>
Asset Class	∂ GRR	GRR MRR STD	ும்	1.Ye - 2.Ye - 3.Ye 5.Ye - 10Yr	2.Yr	ੋ3-Yr		10Yr.	Return	Beta	Dur	Liq	luc	Costs	Hedg
Domestic Equity											ı	•		ć	Ļ
All Cap	8.4%	86.6	18.6%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	<del>-</del>	0	6. 6	2.1	<u> </u>	n ۱
Large Cap	8.2%	9.6%	18.0%	8.2%	8.2%	8.2%	8.2%	8.2%	8.2%	0.94	0	9.5	2.5	25	တ
Mid Cap	8.4%	10.4%	21.1%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	1.05	0	9.2	1.5	30	2
Small Cap	8.5%	11.0%	24.0%	8.5%	8.5%	8.5%	8.5%	8.5%	8.5%	1.15	0	თ	1.2	20	2
Micro Cap	8.9%	12.4%	28.8%	8.9%	8.9%	8.9%	8.9%	8.9%	8.9%	1.25	0	8.5	0.5	20	2
Smid Cap	8.4%	10.5%	21.7%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	1.09	0	9.1	1.4	40	သ
International Equity															
Dvlpd Mkts-Unh	8.2%	9.7%	18.6%	8.2%	8.2%	8.2%	8.2%	8.2%	8.2%	-	0	თ	2.7	20	သ
Dvlpd Mkts Hgd	8.2%	9.5%	17.2%	8.2%	8.2%	8.2%	8.2%	8.2%	8.2%	<b>-</b>	0	6	2.7	20	S.
Emerging Mkts	8.4%	11.3%	26.0%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	1,15	0	8.3	7	75	2
Intl Small Cap	8.4%	11.1%	25.0%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	1.15	0	8.7	1.5	09	2
World x-U.S.	8.4%	9.9%	18.4%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	-	0	8.8	2.5	22	Ŋ
Global Equity	8.4%	9.7%	16.9%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	-	0	8.9	2.2	22	ည
Global Small Cap	8.6%	10.7%	21.7%	8.6%	8.6%	8.6%	8.6%	8.6%	8.6%	1.17	0	8.3	1.2	75	ည
Domestic Fixed Income														~	
Gov/Corp	4.6%	4.8%	%0.9	%6:0	0.7%	1.2%	2.3%	3.5%	5.3%	0.1	5.3	9.4	4.6	30	2
Aggregate	4.7%	4.8%	5.5%	1.0%	0.8%	1.3%	2.4%	3.6%	5.4%	0.1	4.4	9.3	2	32	7
Short G/C	4.2%	4.2%	3.0%	0.2%	0.4%	1.2%	2.2%	3.4%	4.4%	0	1.9	9.5	3.7	70	5.5
Intermediate G/C	4.5%	4.6%	4.5%	0.2%	0.4%	1.1%	2.1%	3.4%	2.0%	0	3.9	9.4	4.3	30	4
Long G/C	4.8%	5.4%	11.0%	0.3%	1.4%	1.6%	2.0%	3.5%	2.9%	0.1	12.2	9.5	6.1	22	2
Very Long Bonds	4.7%	6.2%	18.0%	-0.1%	1.5%	3.2%	2.5%	3.6%	5.2%	0	20	9.6	4.9	50	-
Government	3.8%	4.0%	6.5%	-0.1%	%0.0	%9.0	1.4%	2.8%	4.6%	0	4.7	9.9	3.6	10	7
Corporate/Credit	5.3%	5.5%	6.5%	0.5%	1.4%	2.0%	2.9%	4.0%	%0.9	0.2	6.3	6	6.8	20	က
Long Government	3.6%	4.2%	11.5%	%0.0	0.5%	0.8%	1.3%	2.7%	5.1%	0	12.4	6.6	4.7	10	<del></del>
Intrmd Credit	4.8%	4.9%	5.2%	0.5%	1.1%	1.8%	2.7%	3.9%	5.4%	0.2	4.4	8.9	6.1	20	4
Long Credit	5.7%	6.3%	11.5%	0.8%	2.3%	2.6%	3.2%	4.2%	6.5%	0.2	12	8.9	7.7	09	က
Mortgage-Backed	4.4%	4.6%	6.3%	4.2%	4.2%	4.3%	5.2%	5.3%	%0.9	0	3.1	8.8	5.3	9	က
High Yield	6.4%	%6.9	10.0%	7.1%	7.0%	6.9%	8.9%	6.7%	6.3%	0.5	4.3	7	9	120	9
Muni Bonds	4.2%	4.5%	8.3%	4.2%	4.2%	4.2%	4.2%	4.2%	4.3%	0	2.2	7	5.4	120	က
Infi Indexed Bonds	4.5%	4.6%	4.5%	0.4%	0.8%	1.3%	2.1%	3.3%	4.8%	0	2.4	9.6	3.4	20	∞
Intermediate IIBs	4.2%	4.2%	3.0%	0.2%	0.3%	%6.0	1.8%	3.1%	4.6%	0	1.8	9.5	က	22	∞
Long IIBs	4.9%	5.1%	7.0%	0.5%	1.7%	2.0%	2.6%	3.6%	2.0%	0	4.8	9.5	ო	22	ω
Cash	3.4%	3.4%	1.3%	0.2%	0.7%	1.2%	2.0%	2.9%	3.8%	6	0.1	9	<b>-</b>	4	9

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 187

Responding Witness: S. Bradford Rives

- Q-187. Please provide KU's authorized and earned return on common equity for electric operations over the past five years. Please show the figures used in calculating the earned return on common equity for each year, including all adjustments to net income and/or common equity. Please provide copies of all associated workpapers and source documents. Please provide copies of the source documents, workpapers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-187. Please see the response to KPSC-1 Question No. 38. The electronic version is provided on the attached CD in the folder titled Question No. 187.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### **Question No. 188**

Responding Witness: Valerie L. Scott

- Q-188. Please provide copies of the financial statements (balance sheet, income statement, statement of cash flows, and the notes to the financial statements) for KU, E.ON U.S. LLC, and E.ON AG for the past 2007 and 2008. Please include 2009 financial statements when they become available. Please provide copies of the financial statements in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-188. See attached CD in folder titled Question No. 188 for copies of KU, E.ON U.S. LLC, and E.ON AG financial statements for 2007 and 2008, as requested. The E.ON AG 2009 financial statements are also included. The KU and E.ON U.S. LLC 2009 financial statements will be provided once they are available.

Because the attachments are voluminous, the Company is not providing a hard copy of this information to the Attorney General only.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### Question No. 189

Responding Witness: Daniel K. Arbough

- Q-189. For the past two years, please provide the dates and amount of: (1) cash dividend payments made by KU to E.ON. U.S. LLC; and (2) cash equity infusions made by E.ON. U.S. LLC into KU.
- A-189. (1) Cash Dividends None

(2) Equity Infusions - 3/28/08 \$25,000,000 6/27/08 \$50,000,000 9/29/08 \$50,000,000 12/26/08 \$20,000,000 3/30/09 \$50,000,000 6/29/09 \$25,000,000

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 190

- Q-190. Please provide copies of the workpapers used by Dr. Avera in preparing his testimony and schedules.
- A-190. See attached CD, in folder titled Question No. 190.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 191

- Q-191. Please provide copies of the publications cited in the testimony.
- A-191. Please refer to the response to Question No. 190.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### **Question No. 192**

- Q-192. With reference to page 24, lines 1-12, please: (1) indicate the justification for each of the screens applied to the electric utilities in the Value Line Investment Survey; (2) the companies eliminated from the group from each of the screens; and (3) the values or reasons that each of the companies were eliminated.
- A-192. 1) As explained in Dr. Avera's testimony, the purpose of the proxy group criteria was to identify risk-comparable utilities for purposes of estimating a fair ROE. Dr. Avera's testimony also noted that the risk indicators used to screen the electric utilities followed by Value Line are objective, widelyreported measures that are likely to reflect the perceptions of investors. Given the similarities in risks between KU and its sister utility, LG&E, and the fact that LG&E is also engaged in gas utility operations, Dr. Avera restricted his Utility Proxy Group to companies with both electric and gas utility operations. Meanwhile, analogous to the comparable risk band applied by FERC, the range of S&P corporate credit ratings fell one notch lower and higher than KU's "BBB+" rating. As noted in Dr. Avera's testimony, the Value Line Safety Rank and Financial Strength Ratings used to identify the Utility Proxy Group are synonymous with a conservative risk profile and supported a conclusion that the Utility Proxy Group provides a sound basis to estimate the cost of equity for KU. Finally, a requirement that each proxy firm has at least two alternative earnings per share growth projections better ensures that the resulting DCF cost of equity estimates will not be erroneous.
  - 2) Please refer to WEA WP-58 provided in response to Question No. 190.
  - 3) Please refer to WEA WP-58 provided in response to Question No. 190.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 193** 

- Q-193. With reference to page 25, lines 6-13, please: (1) list the screens applied to the *Value Line* database in establishing the Non-Utility Proxy Group; (2) indicate the justification for each of the screens applied to the companies in the *Value Line Investment Survey* in establishing the Non-Utility Proxy Group; (3) the companies eliminated from the group from each of the four screens; (4) the reasons that each of the companies were eliminated; and (5) the companies eliminated by the requirement of at least two published growth rates estimates.
- A-193. 1) Please refer to Dr. Avera's testimony at page 25 for a list of the criteria used to define the Non-Utility Proxy Group.
  - 2) As explained in Dr. Avera's testimony, the purpose of the proxy group criteria was to identify risk-comparable utilities for purposes of estimating a fair ROE. Dr. Avera's testimony also noted that the risk indicators used to screen the companies included in the Non-Utility Proxy Group are objective, widely-reported measures that are likely to reflect the perceptions of investors. Moreover, while any differences in investment risk attributable to regulation should already be reflected in these objective measures, Dr. Avera's analyses nevertheless conservatively focus on a lower-risk group of non-utility firms.
  - 3) Dr. Avera applied the dividend yield, Safety Rank, and Financial Strength criteria to the 1,500-plus firms covered by Value Line using Value Line's interactive, internet-based proprietary stock screening program. As a result, he does not have a list of the firms that did not meet these selection criteria. Additional information regarding firms excluded from the Non-Utility Proxy Group is provided in WEA WP-58 provided in response to Question 190.
  - 4) Please refer to the response to subpart (3), above.
  - 5) While a requirement that each proxy firm has at least two alternative earnings per share growth projections better ensures that the resulting DCF

# Response to Question No. 193 Page 2 of 2 Avera

cost of equity estimates will not be erroneous, no companies were eliminated from the Non-Utility Proxy Group based on this criterion.

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# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 194

- Q-194. With reference to page 24, lines 1-3, please provide the individual data for the companies in the proxy group which were used to assess the riskiness of the proxy group relative to KU.
- A-194. Please refer to WEA WP-58 provided in response to Question No. 190.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

## Question No. 195

- Q-195. With reference to page 24, lines 1-18, Please provide copies of all empirical studies performed that compare the business, financial, and investment risk of KU: (1) the utility group; and (2) the non-utility group.
- A-195. Dr. Avera performed no empirical studies to compare the investment risk of KU. Rather as explained in Dr. Avera's testimony, his evaluation of overall investment risks was based on the objective, published risk indicators discussed in his testimony. Because these widely referenced indicators reflect the overall risk evaluation of the investment community, they provide a direct guide to the likely perceptions of investors.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

## **Question No. 196**

- Q-196. With reference to page 37, lines 10-26, and Schedule WEA-2, please provide: (1) the data, methodology, calculations, and workpapers used to eliminate the low and high DCF cost of estimates; and (2) the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
- A-196. The logic underlying Dr. Avera's evaluation of low and high-end outliers was fully articulated in his testimony, with supporting information being provided in response to Question No. 190. Copies of the pages referenced by Dr. Avera in support of his evaluation of low and high-end DCF cost of equity estimates are provided in response to KPSC-2 Question No. 62 and Question No. 63.

## CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 197

- Q-197. With reference to page 38, lines 1-15, please provide copies of FERC orders that specify its 'test of economic logic' as it relates to low DCF estimates.
- A-197. Copies of the FERC Orders referenced on page 38 in Dr. Avera's testimony are provided in response to KPSC-2 Question No. 62 on CD in the folder titled Question No. 62, referenced as Attachment 1 and Attachment 2.

## CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 198

- Q-198. With reference to page 39, Table WEA-3, please provide copies of all source documents, workpapers, and data used in the construction of Table WEA-3. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
- A-198. Please refer to the response to Question No. 190.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 199

- Q-199. With reference to page 43, lines 1-22, and Schedule WEA-6, please provide copies of all source documents, workpapers, and data used in the DCF analysis applied to the S&P 500. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
- A-199. The data and calculations underlying Dr. Avera's application of the DCF model to the dividend paying firms is contained in WEA WP-58 provided in response to Question No. 190. Because the underlying data was obtained interactively, Dr. Avera does not have any hard copy documents supporting this analysis.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### Question No. 200

- Q-200. With reference to pages 46-48 and Schedule WEA-8, please (1) list all regulatory cases (by name, docket number, and filing date) in which Dr. Avera has provided rate of return testimony and employed his Expected Earnings Approach to estimating the cost of equity capital; (2) indicate all cases (by name, docket number, and date), other than those cited, in which a regulatory commission has explicitly adopted Dr. Avera's Expected Earnings Approach to estimating the cost of equity capital in arriving at an overall rate of return; and (3) provide copies of the 'Rate of Return' section of the Commission's decisions for all cases in which a regulatory commission has adopted the Dr. Avera's Expected Earnings Approach.
- A-200. 1) Dr. Avera has testified in over 300 regulatory proceedings and he does not maintain a database to track the details underlying the methods used in each separate proceeding. Nevertheless, Dr. Avera has consistently considered expected earned rates of return as a guide to investors' requirements.
  - 2) Dr. Avera does not maintain a database detailing the specific findings in each and every case in which he has testified, nor has he conducted such a review for purposes of his testimony in this proceeding.
  - 3) Dr. Avera does not routinely compile copies of the regulatory decisions issued in cases in which he has submitted testimony, nor has he conducted such research for purposes of his testimony in this proceeding.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 201

Responding Witness: William A. Avera/Daniel K. Arbough

- Q-201. With reference to pages 47-50, please provide: (1) copies of all data, workpapers, and source documents used in the development of the flotation cost adjustment for KU; and (2) document all equity flotation costs associated with financings by KU in the past three years.
- A-201. 1) The sources for the flotation cost percentages detailed in Dr. Avera's testimony were included in his workpapers provided in response to Question No. 190.
  - 2) There have been no flotation costs in the last three years as all equity increases were in the form of contributions from the parent company.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 202

- Q-202. With reference to pages 53-59, and Exhibit WEA-10, please provide copies of all source documents, workpapers, and data used in the capital structure analysis. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
- A-202. Please refer to the response to Question No. 190. Underlying data was taken from Form 10-K Reports, which are publicly available at http://www.sec.gov/edgar/searchedgar/companysearch.html.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 203

- Q-203. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-2. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-203. Please refer to the response to Question No. 190.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 204

- Q-204. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-3. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-204. Please refer to the response to Question No. 190.

## CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 205

- Q-205. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-4. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-205. Please refer to the response to Question No. 190.

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## CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 206** 

- Q-206. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-5. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-206. Please refer to the response to Question No. 190.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

## Question No. 207

- Q-207. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-6. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-207. Please refer to the response to Question Nos. 190 and 199.

## CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 208

- Q-208. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-7. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-208. Please refer to the response to Question Nos. 190 and 199.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 209** 

- Q-209. Please provide: (1) copies of the source documents, workpapers, and underlying data used in Exhibit WEA-8; (2) please provide an expected earnings analysis for the non-utility proxy group, and explain why such an analysis was not presented in Exhibit WEA-8; and (3) the data and workpapers used in (1) and (2) in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-209. 1) Please refer to the response to Question No. 190.
  - 2) Unlike regulated utilities, the earnings of firms in the non-regulated sector of the economy are not directly related to the book value of their investment. As a result, earned rates of return calculated on book value equity are unlikely to be representative of investors' required rate of return and Dr. Avera did not apply the expected earnings approach to the firms in the Non-Utility Proxy Group. The data necessary to apply the expected earnings approach to the firms in the Non-Utility Proxy Group is provided in response to Question No. 190.
  - 3) Please refer to the response to subparts (1) and (2), above.

## CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 210

- Q-210. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-9. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-210. Please refer to the response to Question No. 190.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 211

- Q-211. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-10. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-211. Please refer to the response to Question No. 190.



## CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

## Question No. 212

Responding Witness: S. Bradford Rives

- Q-212. With reference to Exhibit 2, page 1 of 1, please provide copies of the data, source documents, and workpapers used to develop the capital structure for the company in Exhibit 2. Please provide copies of the source documents, workpapers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-212. See the response to KIUC-1 Question No. 21.

### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 213** 

Responding Witness: S. Bradford Rives

- Q-213. With reference to Exhibit 2, page 1 of 1, please provide copies of the data, source documents, and workpapers used to develop the adjustments to the capital structure for the electric and gas operations of the company in Exhibit 2. Please provide copies of the source documents, workpapers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-213. See the response to KIUC-1 Question No. 21.

### CASE NO. 2009-00548

## Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 214

Responding Witness: Daniel K. Arbough

- Q-214. With reference to Exhibit 2, page 1 of 1, please provide the quarterly capitalization amounts and ratios, including and excluding short-term debt, for the past three years for KU (2007-2009). Please provide the data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-214. See attached CD in the folder titled Question No. 214.

53.06% 0.00%

1,951,966

1,917,463

52.99%

1,851,064

53.83%

1,800,830

53.20% 1,743,493 100.00% \$ 3,291,519

Common Equity 1,677,093

Total Capitalizatio \$ 3,152,101

Preferred Stock

1,743,493

0.00% 52.97%

0.00% 53.68%

100.00%

100.00% \$ 3,678,720

100.00% \$ 3,345,430 100.00% \$ 3,493,399 100.00% \$ 3,572,152

Kentucky Utilities Company Case No. 2009-00548

Attorney General Question No. 214

Responding Witness: Daniel K. Arbough

"000 Omitted"

2008	Ratio	44.09% 2.54% 0.00% 53.37% 100.00%	1, 2009	Kallo	45.72% 1.22% 0.00%
June 30, 2008	Amonut	44.81% \$ 1,309,160 1.78% 75,443 0.00% - 53.41% 1,584,444 (00.00% \$ 2,969,047	December 31, 2009	Amount	45.68% \$ 1,681,779 0.64% 44,975 0.00%
2008	Ratio	44.81% 1.78% 0.00% 53.41% 100.00%	0, 2009	Katio	
March 31, 2008	Amount	46.42% \$ 1,263,753 0.85% 50,063 0.00% - 52.73% 1,506,440 100.00% \$ 2,820,256	September 30, 2009	Amount	45.28% \$ 1,631,779 1.73% 22,910 0.00%
1, 2007	Ratio	46.42% 0.85% 0.00% 52.73% 100.00%	6007	Ratio	45.28% 1.73% 0.00%
December 31, 2007	Amount	42.44% \$ 1,263,753 4.09% 23,219 0.00% - 53.47% 1,435,516 (00.00% \$ 2,722,488	June 30, 2009	Amount	45.79% \$ 1,581,779 0.38% 60,556 0.00% -
0, 2007	Ratio	42.44% 4.09% 0.00% 53.47% 100.00%	2009	Ratio	
September 30, 2007	Amount	41.27% \$ 1,093,753 5.83% 105,303 0.00% - 52.90% 1,378,207 00.00% \$ 2,577,263	March 31, 2009	Amount	46.54% \$ 1,531,779 0.49% 12,821 0.00% -
2007	Ratio	41.27% 5.83% 0.00% 52.90% 100.00%	1, 2008	Ratio	46.54% 0.49% 0.00%
June 30, 2007	Amount	916,951 41.92% \$ 993,753 32,043 1.46% 140,309 - 0.00% - 1,238,564 56.62% 1,273,745 2,187,558 100.00% \$ 2,407,807	December 31, 2008	Amount	\$ 1,531,779 16,247
2007	Ratio	41.92% 1.46% 0.00% 56.62% 100.00%	10, 2008	Ratio	43.12% 3.68% 0.00%
March 31 2007	Amount	\$ 916,951 32,043 - 1,238,564 \$ 2,187,558	September 30, 2008	Amount	\$ 1,359,160 115,848
	Line No. Type of Capital	Long-Term Debt \$ 916,951 41.92% \$ 993,753 41.27% \$ 1,093,753 42.44% \$ 1,263,753 46.42% \$ 1,263,753 44.81% \$ 1,309,160    Long-Term Debt 32,043 1.46% 140,309 5.83% 105,303 4.09% 23,219 0.85% 50,063 1.78% 75,443    Preferred Stock - 0.00% - 0.00% - 0.00% - 0.00% - 0.00% - 0.00% - 0.00%		Line No. Type of Capital	Long-Term Debt \$ 1,359,160 43.12% \$ 1,531,779 Short-Term Debt 115,848 3.68% 16,247 Preferred Stock - 0.00% -
	Line No.	1 2 8 4 5		Line No.	- 2 %

Note 1: Total long-term debt includes the short-term portion of long-term debt.

Note 2: The above amounts do not include imputed debt from the purchased power agreements.

Kentucky Utilities Company Case No. 2009-00548

Attorney General Question No. 214

Responding Witness: Daniel K. Arbough

"000 Omitted"

June 30, 2008	Amount Ratio	Long-Term Debt \$ 916,951 42.54% \$ 993,753 43.83% \$ 1,093,753 44.25% \$ 1,263,753 46.82% \$ 1,263,753 45.62% \$ 1,309,160 45.24%  Long-Term Debt - 0.00% - 0.00% - 0.00% - 0.00% - 0.00% - 0.00% - 0.00% - 0.00%  Preferred Stock - 0.00% - 0.00% - 0.00% - 0.00% - 0.00% - 0.00%  Common Equity 1,238,564 57.46% 1,273,745 56.17% 1,378,207 55.75% 1,435,516 53.18% 1,506,440 54.38% 1,584,444 54.76%  Total Capitalizatio \$ 2,155,515 100.00% \$ 2,267,498 100.00% \$ 2,471,960 100.00% \$ 2,699,269 100.00% \$ 2,770,193 100.00% \$ 2,893,604 100.00%	
31, 2008	Ratio	3 45.62% 0.00% 0.00% 0 54.38% 3 100.00%	
March 2	Amount	46.82% \$ 1,263,753 0.00% - 0.00% - 53.18% 1,506,440 100.00% \$ 2,770,193 1	,
-31, 2007	Ratio	46.82% 0.00% 0.00% 5 53.18% 9 100.00%	
September 30, 2007 December 31, 2007 March 31, 2008	Amount	44.25% \$ 1,263,753 0.00% - 55.75% 1,435,516 100.00% \$ 2,699,269	
30, 2007	Ratio	44.25% 0.00% 0.00% 55.75% 100.00%	
Sentember	Amount Ratio	.753 43.83% \$ 1,093,753 - 0.00% - - 0.00% - .745 56.17% 1,378,207 ,498 100.00% \$ 2,471,960	
2007	Ratio	43.83% 0.00% 0.00% 56.17% 100.00%	
Tupe 30 2007	Amount Ratio	\$ 993,753 - 1,273,745 \$ 2,267,498	
2000	Ratio	42.54% \$ 993, 0.00% 0.00% 57.46% 1,273, 100.00% \$ 2,267,	
Manah 21 2007	Amount	\$ 916,951 - 1,238,564 \$ 2,155,515	
	March 31	Long-Term Debt \$ 916,951 42.54% \$ 993,753 43.83% \$ 1,093,753  Short-Term Debt - 0.00% - 0.00% - 0.00% - 0.00%  Preferred Stock - 0.00% - 0.00% - 0.00%  Common Equity 1,238,564 57.46% 1,273,745 56.17% 1,378,207  Total Capitalizatio \$ 2,155,515 100.00% \$ 2,267,498 100.00% \$ 2,471,960	
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Note 1: Total long-term debt includes the short-term portion of long-term debt. Note 2: The above amounts do not include imputed debt from the purchased power agreements.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 215

Responding Witness: Daniel K. Arbough

- Q-215. With reference to pages Exhibit 2, Column 15, please provide (1) all data, workpapers, source documents, and calculations used in computing the short-term and long-term cost rates; (2) all details (issue date, debt amounts, underwriter, underwriting spread, SEC filings, etc.) associated with all financings used in determining the Company's short-term and long-term debt cost rates; and (3) the methodology, computations, and associated workpapers used to compute the short-term debt cost rate and intercompany loans. Please provide the data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-215. See the attached CD in the folder titled Question No. 215 for the files that provide support for the calculation of the short-term and long-term interest cost rates shown in Exhibit 2. A petition for confidential treatment of the file titled "Attachment to LGE AG 1-215(b)" is filed simultaneously herewith. The files also show the details of issuance date, issuance costs, underwriters and associated costs. There are no SEC filings associated with any of the Company's outstanding debt.

### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 216

Responding Witness: William Steven Seelye

- Q-216. Please provide a fully executable computerized copy of the KU class cost of service study in Microsoft Excel format. In this response provide all linked files.
- A-216. See response to KPSC-2 Question No. 77.

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#### CASE NO. 2009-00548

## Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 217** 

Responding Witness: William Steven Seelye

- Q-217. Please explain and provide all workpapers and spreadsheets showing the determination of the separation of Production and Transmission costs among Intermediate, and Peak implicit in the determination in KU Seelye Exhibit 17, Page 1. In this response, explain the relevance or relationship with KU Seelye Exhibit 17 of the Non-Time-Differentiated cost (34.89%), Summer Peak Period Cost (21.86%) and Winter Peak Period Costs (43.25%). Please provide this response in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel), including all workpapers, source documents, calculations etc. that support the amounts, assumptions, and calculations presented therein.
- A-217. See response to KPSC-2 Question No. 77. Also, see attached CD, in the folder titled Question No. 217.

	Season Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
11/1/2008	0	0	0	24
11/2/2008	0	0	0	24
11/3/2008	0	1	16	8
11/4/2008	0	1	16	8
11/5/2008	Ő	1	16	8
11/6/2008	0	1	16	8
11/7/2008	0	1	16	8
11/8/2008	0	0	0	24
11/9/2008	0	0	0	24
11/10/2008	0	1	16	8
11/11/2008	0	1	16	8
11/12/2008	0	1	16	8
11/13/2008	0	1	16	8
11/14/2008	0	1	16	8
11/15/2008	0	0	0	24
11/16/2008	0	0	0	24
11/17/2008	0	1	16	8
11/18/2008	0	1	16	8
11/19/2008	0	1	16	8
11/20/2008	0	1	16	8
11/21/2008	0	1	16	8
11/22/2008	0	0	0	24
11/23/2008	0	0	0	24
11/24/2008	0	1	16	8
11/25/2008	0	1	16	8
11/26/2008	0	1	16	8
11/27/2008	0	1	16	8
11/28/2008	0	1	16	8
11/29/2008	0	0	0	24
11/30/2008	0	0	0	24
12/1/2008	0	1	16	8
12/2/2008	0	1	16	8
12/3/2008	0	1	16	8
12/4/2008	0	1	16	8
12/5/2008	0	1	16	8
12/6/2008	0	0	0	24
12/7/2008	0	0	0	24
12/8/2008	0	1	16	8
12/9/2008	0	1	16	8
12/10/2008	0	1	16	8
12/11/2008	0 0	1 1	16 16	8
12/12/2008 12/13/2008	0	0	0	8
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	Season			
Davi	Summer Non Summer	Weekday	On Book	Off Dook
Day	Non-Summer	Weekend	On-Peak	Off-Peak
12/15/2008	0	1	16	8
12/16/2008	0	1	16	8
12/17/2008	0	1	16	8
12/18/2008	0	1	16	8
12/19/2008	0	1	16	8
12/20/2008	0	0	0	24
12/21/2008	0	0	0	24
12/22/2008	0	1	16	8
12/23/2008	0	1	16	8
12/24/2008	0	1	16	8
12/25/2008	0	1	16	8
12/26/2008	0	1	16	8
12/27/2008	0	0	0	24
12/28/2008	0	0	0	24
12/29/2008	0	1	16	8
12/30/2008	0	1	16	8
12/31/2008	0	1	16	8
1/1/2009	0	1	16	8
1/2/2009	0	1	16	8
1/3/2009	0	0	0	. 24
1/4/2009	0	0	0	24
1/5/2009	0	1	16	8
1/6/2009	0	1	16	8
1/7/2009	0	1	16	8
1/8/2009	0	1	16	8
1/9/2009	0	1	16	8
1/10/2009	0	0	0	24
1/11/2009	0	0	0	24
1/12/2009	0	1	16	8
1/13/2009	0	1	16	8
1/14/2009	0	1	16	8
1/15/2009	0	1	16	8
1/16/2009	0	1	16	8
1/17/2009	0	0	0	24
1/18/2009	0	0	0	24
1/19/2009	0	1	16	8
1/20/2009	0	1	16	8
1/21/2009	0	1	16	8
1/22/2009	0	1	16	8
1/23/2009	0	1	16	8
1/24/2009	0	0	0	24
1/25/2009	0	0	0	24
1/26/2009	0	1	16	8
1/27/2009	0	1	16	8

	Season			
	Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
1/28/2009	0	1	16	8
1/29/2009	0	1	16	8
1/30/2009	0	1	16	8
1/31/2009	0	0	0	24
2/1/2009	0	0	0	24
2/2/2009	0	1	16	8
2/3/2009	0	1	16	8
2/4/2009	0	1	16	8
2/5/2009	0	1	16	8
2/6/2009	0	1	16	8
2/7/2009	0	0	0	24
2/8/2009	0	0	0	24
2/9/2009	0	1	16	8
2/10/2009	0	1	16	8
2/11/2009	0	1	16	8
2/12/2009	0	1	16	8
2/13/2009	0	1	16	8
2/14/2009	0	0	0	24
2/15/2009	0	0	0	24
2/16/2009	0	1	16	8
2/17/2009	0	1	16	8
2/18/2009	0	1	16	8
2/19/2009	0	1	16	8
2/20/2009	0	1	16	8
2/21/2009	0	0	0	24
2/22/2009	0	0	0	24
2/23/2009	0	1	16	8
2/24/2009	0	1	16	8
2/25/2009	0	1	16	8
2/26/2009	0	1	16	8
2/27/2009	0	1	16	8
2/28/2009	0	0	0	24
3/1/2009	0	0	0	24
3/2/2009	0	1	16	8
3/3/2009	0	1	16	8
3/4/2009	0	1	16	8
3/5/2009	0	1	16	8
3/6/2009	0	1	16	8
3/7/2009	0	0	0	24
3/8/2009	0	0	0	24
3/9/2009	0	1	16	8
3/10/2009	0	1	16	8
3/11/2009	0	1	16	8
3/12/2009	0	1	16	8

# Seelye

	Season Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
3/13/2009	0	1	16	8
3/14/2009	0	0	0	24
3/15/2009	0	0	0	24
3/16/2009	0	1	16	8
3/17/2009	0	1	16	8
3/18/2009	0	1	16	8
3/19/2009	0	1	16	8
3/20/2009	0	1	16	8
3/21/2009	0	Ö	0	24
3/22/2009	0	0	0	24
3/23/2009	0	1	16	8
3/24/2009	0	1	16	8
3/25/2009	0	1	16	8
3/26/2009	0	1	16	8
3/27/2009	0	1	16	8
3/28/2009	0	0	0	24
3/29/2009	0	0	0	24
3/30/2009	0	1	16	8
3/31/2009	0	1	16	8
4/1/2009	0	1	16	8
4/2/2009	0	1	16	8
4/3/2009	0	1	16	8
4/4/2009	0	0	0	24
4/5/2009	0	0	0	24
4/6/2009	0	1	16	8
4/7/2009	0	1	16	8
4/8/2009	0	1	16	8
4/9/2009	0	1	16	8
4/10/2009	0	1	16	8
4/11/2009	0	0	0	24
4/12/2009	0	0	0	24
4/13/2009	0	1	16	8
4/14/2009	0	1	16	8
4/15/2009	0	1	16	8
4/16/2009	0	1	16	8
4/17/2009	0	1	16	8
4/18/2009	0	0	0	24
4/19/2009	0	0	0	24
4/20/2009	0	1	16	8
4/21/2009	0	1	16	8
4/22/2009	0	1	16	8
4/23/2009	0	1	16	8
4/24/2009	0	1	16	8
4/25/2009	0	0	0	24

	Season Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
4/26/2009	0	0	0	24
4/27/2009	0	1	16	8
4/28/2009	0	1	16	8
4/29/2009	0	1	16	8
4/30/2009	Ö	1	16	8
5/1/2009	1	1	12	12
5/2/2009	1	0	0	24
5/3/2009	1	0	0	24
5/4/2009	1	1	12	12
5/5/2009	1	1	12	12
5/6/2009	1	1	12	12
5/7/2009	1	1	12	12
5/8/2009	1	1	12	12
5/9/2009	1	0	0	24
5/10/2009	1	0	0	24
5/11/2009	1	1	12	12
5/12/2009	1	1	12	12
5/13/2009	1	1	12	12
5/14/2009	1	1	12	12
5/15/2009	1	1	12	12
5/16/2009	1	0	0	24
5/17/2009	1	0	0	24
5/18/2009	1	1	12	12
5/19/2009	1	1	12	12
5/20/2009	1	1	12	12
5/21/2009	1	1	12	12
5/22/2009	1	1	12	12
5/23/2009	1	0	0	24
5/24/2009	1	0	0	24
5/25/2009	1	1	12	12
5/26/2009	1	1	12	12
5/27/2009	1	1	12	12
5/28/2009	1	1	12	12
5/29/2009	1	1	12	12
5/30/2009	1	0	0	24
5/31/2009	1	0	0	24
6/1/2009	1	1	12	12
6/2/2009	1	1	12	12
6/3/2009	1	1	12	12
6/4/2009	1	1	12	12
6/5/2009	1	1	12	12
6/6/2009	1	0	0	24
6/7/2009	1	0	0	24
6/8/2009	1	1	12	12

Dev	Season Summer Non-Summer	Weekday Weekend	On-Peak	Off-Peak
Day	Non-Summer	weekend	UII-Feak	OII-Feak
6/9/2009	1	1	12	12
6/10/2009	1	1	12	12
6/11/2009	1	1	12	12
6/12/2009	1	1	12	12
6/13/2009	1	0	0	24
6/14/2009	1	0	0	24
6/15/2009	1	1	12	12
6/16/2009	1	1	12	12
6/17/2009	1	1	12	12
6/18/2009	1	1	12	12
6/19/2009	1	1	12	12
6/20/2009	1	0	0	24
6/21/2009	1	0	0	24
6/22/2009	1	1	12	12
6/23/2009	1	1	12	12
6/24/2009	1	1	12	12
6/25/2009	1	1	12	12
6/26/2009	1	1	12	12
6/27/2009	1	0	0	24
6/28/2009	1	0	0	24
6/29/2009	1	1	12	12
6/30/2009	1	1	12	12
7/1/2009	1	1	12	12
7/2/2009	1	1	12	12
7/3/2009	1	1	12	12
7/4/2009	1	0	0	24
7/5/2009	1	0	0	24
7/6/2009	1	1	12	12
7/7/2009	1	1	12	12
7/8/2009	1	1	12	12
7/9/2009	1	1	12	12
7/10/2009	1	1	12	12
7/11/2009	1	0	0	24
7/12/2009	1	0	0	24
7/13/2009	1	1	12	12
7/14/2009	1	1	12	12
7/15/2009	1	1	12	12
7/16/2009	1	1	12	12
7/17/2009	1	1	12	12
7/18/2009	1	0	0	24
7/19/2009	1	0	0	24
7/20/2009	1	1	12	12
7/21/2009	1	1	12	12
7/22/2009	1	1	12	12

	Season Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
7/23/2009	1	1	12	12
7/24/2009	1	1	12	12
7/25/2009	1	Ó	0	24
7/26/2009	1	Ö	ő	24
7/27/2009	1	1	12	12
7/28/2009	1	1	12	12
7/29/2009	1	1	12	12
7/30/2009	1	1	12	12
7/31/2009	1	1	12	12
8/1/2009	1	Ö	0	24
8/2/2009	1	0	0	24
8/3/2009	1	1	12	12
8/4/2009	1	1	12	12
8/5/2009	1	1	12	12
8/6/2009	1	1	12	12
8/7/2009	1	1	12	12
8/8/2009	1	0	0	24
8/9/2009	1	0	0	24
8/10/2009	1	1	12	12
8/11/2009	1	1	12	12
8/12/2009	1	1	12	12
8/13/2009	1	1	12	12
8/14/2009	1	1	12	12
8/15/2009	1	0	0	24
8/16/2009	1	0	0	24
8/17/2009	1	1	12	12
8/18/2009	1	1	12	12
8/19/2009	1	1	12	12
8/20/2009	1	1	12	12
8/21/2009	1	1	12	12
8/22/2009	1	0	0	24
8/23/2009	1	0	0	24
8/24/2009	1	1	12	12
8/25/2009	1	1	12	12
8/26/2009	1	1	12	12
8/27/2009	1	1	12	12
8/28/2009	1	1	12	12
8/29/2009	1	0	0	24
8/30/2009	1	0	0	24
8/31/2009	1	1	12	12
9/1/2009	1	1	12	12
9/2/2009	1	1	12	12
9/3/2009	1	1	12	12
9/4/2009	1	1	12	12

Seelye

Season	
Summer Weekday	
Day Non-Summer Weekend On-Peak	Off-Peak
0/5/0000	0.4
9/5/2009 1 0 0	24
9/6/2009 1 0 0	24
9/7/2009 1 1 12	12
9/8/2009 1 1 12	12
9/9/2009 1 1 12	12
9/10/2009 1 1 12	12
9/11/2009 1 1 12	12
9/12/2009 1 0 0	24
9/13/2009 1 0 0	24
9/14/2009 1 1 12	12
9/15/2009 1 1 12	12
9/16/2009 1 1 12	12
9/17/2009 1 1 12	12
9/18/2009 1 1 12	12
9/19/2009 1 0	24
9/20/2009 1 0	24
9/21/2009 1 1 1 12	12
9/22/2009 1 1 12	12
9/23/2009 1 1 12	12
9/24/2009 1 1 12	12
9/25/2009 1 1 12	12
9/26/2009 1 0	24
9/27/2009 1 0	24
9/28/2009 1 1 12	12
9/29/2009 1 1 12	12
9/30/2009 1 1 12	12
10/1/2009 0 1 16	8
10/2/2009 0 1 16	8
10/3/2009 0 0	24
10/4/2009 0 0	24
10/5/2009 0 1 16	8
10/6/2009 0 1 16	8
10/7/2009 0 1 16	8
10/8/2009 0 1 16	8
10/9/2009 0 1 16	8
10/10/2009 0 0	24
10/11/2009 0 0	24
10/12/2009 0 1 16	8
10/13/2009 0 1 16	8
10/14/2009 0 1 16	8
10/15/2009 0 1 16	8
10/16/2009 0 1 16	8
10/17/2009 0 0 0	24
10/18/2009 0 0	24

	Day	Season Summer Non-Summer	Weekday Weekend	On-Peak	Off-Peak
-					
	10/19/2009	0	1	16	8
	10/20/2009	0	1	16	8
	10/21/2009	0	1	16	8
	10/22/2009	0	1	16	8
	10/23/2009	0	1	16	8
	10/24/2009	0	0	0	24
	10/25/2009	0	0	0	24
	10/26/2009	0	1	16	8
	10/27/2009	0	1	16	8
	10/28/2009	0	1	16	8
	10/29/2009	0	1	16	8
	10/30/2009	0	1	16	8
	10/31/2009	0	0	0	24

	On-Peak	Off-Peak	Total
Total	3,724	5,036	8,760
Summer	1,308	2,364	3,672
Winter	2,416	2,672	5,088



#### CASE NO. 2009-00548

## Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 218** 

Responding Witness: William Steven Seelye

- Q-218. Please provide all workpapers, source documents, and electronic spreadsheets showing the development of each external allocator "functional vector" utilized in Mr. Seelye's KU class cost of service study and referred to at Page 62. In this response, provide the source for all data and the bases for any weightings. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-218. See attached CD, in folder titled Question No. 218.

Kentucky Utilities Company
Determination of Meter Allocation

	Cost per Meter	Year-End Customers	Total Meter Cost	Allocation Factor
Docidontial - Rate RS	\$ 92.30	420,100 \$	420,100 \$ 38,776,136.87	0.642049
General Service - Secondary	214.25	79,637	17,062,391.04	0.282516
All Electric Schools	422.06	292	123,241.90	0.002041
Power Service -Secondary	507.15	8,224	4,170,818.11	0.069060
Power Service - Primary	486.84	415	202,038.59	0.003345
TOD - Secondary	288.90	49	14,155.88	0.000234
TOD - Primary	486.30	64	31,123.30	0.000515
RTS	438.93	32	14,045.67	0.000233
Fluctuating Load Service	442.00	1	442.00	0.000007
Genore I inhting	•	167,384	*	0.000000
Total		676,198	\$ 60,394,393.35	1.00000

Kentucky Utilities Company Determination of Services Allocation

	Cost per Service	Year End Customers	Total Cost	Allocation Factor
Rate Class	109.21	420,100 \$	45,879,905	0.826448
Kesidentai - Mate 185 Ceneral Service - Secondary	108.67	79,637	8,653,850	0.156667
All Electric Schools	1,669.10	292	487,376	0.000574
Power Service - Secondary	2,796.82	8,224	23,001,011	0.016179
Power Service - Primary	•	415	•	•
Time of Day - Secondary	162.43	49	7,959	0.000132
Time of Day - Primary	•	64	ı	·
Retail Transmission Service	•	32	•	•
Fluctuating Load Service	•	1	•	•
	1	167,384		1
Street Lighting		\$ 861,979	78,030,102	1.000000

### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### **Question No. 219**

Responding Witness: Shannon L. Charnas

- Q-219. For each KU and LG&E generating unit that was in service at the end of the test year, owned individually, jointly, or partially, please provide the following:
  - (a) names of owners (and ownership percentages);
  - (b) type and fuels;
  - (c) total nameplate (rated) capacity (MW);
  - (d) total and individual company gross investment at the end of test year;
  - (e) total and individual company depreciation reserve at the end of test year;
  - (f) total and individual company annual test year depreciation expense;
  - (g) gross KWH produced during the test year; and,
  - (h) net (less station use) KWH produced during the test year.
- A-219. (a) (e) See attached.
  - (f) Depreciation expense is not tracked separately by unit. See response to Question No. 253.
  - (g) (h) See attached.

			Ownerchin				Generator			
, in the second			Percentage (a)				Nameplate	Generator N	Generator Nameplate Ownership (MW) (c)	ship (MW) (c)
Unit (a)	Owner (a)	KU	LGE	Other	Type (b)	Fuels (b)	Ratings (MW) (c)	KU	LGE	Other
Brown 1	KU	100%			Conventional	Coal	114	114		
Brown 2	KU	100%			Conventional	Coal	180	081		
Brown 3	KU	100%			Conventional	Coal	446	446		
3	i	47%	53%		Conventional	Gas	123	58	99	
Brown	Toint	62%	38%		Conventional	Gas, Oil	177	110	29	
Drown 7	iont	%29	38%		Conventional	Gas, Oil	177	110	29	
Diowii	117	100%			Conventional	Gas, Oil	126	126		
Brown 8	2 5	100%			Conventional	Gas, Oil	126	126		
Brown 9	2 5	100%			Conventional	Gas, Oil	126	126	m1+1/41.5=	
Brown 10	2 2	100%			Conventional	Gas, Oil	126	126		
									,	-
Cane Run 4	TGE		100%	***************************************	Conventional	Coal	164		164	
Cane Run 5	TUE		100%		Conventional	Coal	209		209	t
Cane Run 6	TGE		%001		Conventional	Coal	272		272	
				***************************************						
Div Dam 1 (1)	KII	100%	***		Conventional	Hydro	6	6	v	
Dix Dam ?	KI	100%			Conventional	Hydro	6	6		
Dix Dam 3	2 12	100%		******	Conventional	Hydro	6	6		
Civ Cair	2					***************************************				***********
Ghent 1	KU	100%			Conventional	Coal	557	557		
Ghent 2	KU	100%			Conventional	Coal	556	556		
Ghent 3	KU	100%			Conventional	Coal	557	557		
Ghent 4	L DX	100%		and the second	Conventional	Coal	556	556		
						7	75	75		
Green River 3	KU	100%			Conventional	Coan	2 :	£ -		
Green River 4	KU	100%			Conventional	Coal	114	114		
1	122	100%			Full Outdoor	Gas, Oil	21	21		
Haefling 1	KI X	100%			Full Outdoor	Gas, Oil	21	21		
Haeffing 3	KU	%001			Full Outdoor	Gas, Oil	21	21		
				a particular has		Ç	356		356	
Mill Creek 1	LGE		2001	****	Conventional	100 C	356		356	
Mill Creek 2	LGE		100%		Colliveninging	, Cont.	250		463	
Mill Creek 3	TGE		%00I		Conventional	, CO			244	
Mill Creek 4	TCE		%001		Conventional	Coal	440		+	
	# <u>C</u>		100%		Conventional	Hydro	10		0	
Ohio Falls 7	. I		100%		Conventional	Hydro	10		01	
OillO rails 2	1 1		28001		Conventional	Hydro	10		10	

	Generator Nameplate Ownership (MW) (c)	LGE Other	10	- 01	13	13	01	94	425 141	85	58	74	74	74	74	ddardailiad es te	16	16 33	
		V) (c) KU						84		141	141	125	125	125	125	75			-
Generator	Nameplate	Ratings (MW) (c)	10	10	13	13	01	178	995	199	199	199	661	661	661	75	16	16	
		Fuels (b)	Hydro	Hydro	Hydro	Hydro	Hydro	Gas	Coal	Gas	Gas	Gas	Gas	Gas	Gas	Coal	Gas, Oil	Gas	_
		Type (b)	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	Conventional	
		Other							25%	•									
Ownership	Percentage (a)	LGE	100%	100%	100%	100%	100%	53%	75%	73%	75%	37%	37%	37%	37%	with high 2 days are - 1000 and 1000 a	100%	%001 	
		KII						47%		71%	71%	63%	63%	63%	63%	100%			
		Owner (a)	1.GF	I.GE	EGE 1	EGE	TGE	Joint	IGE	Joint	Joint	Joint	Joint	Joint	Joint	KU	TOE	997 1997	101
	Constating	Utilit (a)	Ohio Falls 4	Ohio Falls 5	Ohio Falls 6	Ohio Falls 7	Ohio Falls 8	Paddys Run 13	Trimble County 1	Trimble County 5	Trimble County 6	Trimble County 7	Trimble County 8	Trimble County 9	Trimble County 10	Tyrone 3	Cane Run 11	Paddy's Run 11	L'addy s run 12

	, <b>T</b>	KU Gross	LGE	LGE Gross	101	Total Gross	•	The Dept.	1	Total model	,	Color mor	HW7 2202	Not KWH
Generating	Inves	3	Investm	<u>©</u>	Investn	Investment (d) (3)	Re	Reserve (e) (3)	Rese 10/	Reserve (e) (3)   10/31/2009	Rest 10	Reserve (e) (3) 10/31/2009	Produced (g)	Produced (h)
Unit (a)		10/31/2009	10/3	10/31/2009	1	2007/10	1	(002) 302 120)			S	(38,325,120)	322,203,000	289,233,000
Brown 1	8	58,239,565			× 6	506,862,86	n 64	(31,643,751)			S	(31,643,751)	675,899,000	627,235,000
Brown 2	~ ·	51,604,493			n 60	167,769,218	· 69	(106,286,071)				(106,286,071)	1,969,587,000	1,834,351,000
1					,	201 012 01	Ç	(4 885 501)		(6 731 003)	69	(12,616,503)	4,263,000	2,592,000
Brown 5	₩.	23,548,312	S	24,200,814	<b>.</b>	47,749,126	A 6		, e	(1 895 487)	, ,	(9.317.597)	36,494,000	34,203,000
Вгомп 6	S	40,441,005	<b>69</b>	23,711,491	s,	64,152,496	A 6		s 6	(4 391 935)		(11.910.853)	42,274,000	40,139,000
Brown 7	69	41,311,350	S	23,769,004	S	65,080,354	A (		<del>9</del>	(2004,100,4)	, ,	(13 243 810)	9,420,000	7,547,000
Brown 8	۶.	36,379,638			<del>60</del>	36,379,638	6 <del>9</del> (	(13,243,810)			9 64	(618,2F2,CI)	2,999,000	1,524,000
Brown 9	۶۰	48,505,028			€9	48,505,028	<i>y</i> 9 (	(55,213,23)			, <i>u</i>	(13,259,052)	3,965,000	2,504,000
Brown 10	S	29,531,409			<b>6</b> 9 (	29,531,409	Э 6	(13,259,052)			9 <b>6</b> 9	(17,132,705)	000,900,9	4,493,000
Brown 11	<b>\$</b>	44,435,742			so.	44,433,742	۹	(501,251,11)			,			
				72 507 681	Ç.	72.507.681			64)	(57,865,873)	69	(57,865,873)	1,048,569,000	966,602,000
Cane Run 4			9 69	93,964,064	· •	93,964,064			69	(64,116,970)	<del>69</del>	(64,116,970)	1,074,519,000	993,114,000
Cane Run 6			٠,	141,803,002	s	141,803,002			<b>∽</b>	(87,669,199)		(87,669,199)	1,473,509,000	20,007,000,1
(1)	<u>,</u>	12 391 689			€9	12,391,689	69	(8,411,524)			٠,	(8,411,524)	56,279,000	56,130,000
	•													
Dix Dam 3											,		000 525 600	2 950 195 000
Ghent 1	€9	493,607,411			S	493,607,411		(222,448,016)			A 4	(222,448,010)	2,563,425,000	
Ghent 2	<u>~</u>	193,971,163			<b>5</b> 7 (	193,971,163	به در د	(116,623,349)			9 69	(250,741,094)	3,715,455,000	
Ghent 3	٠, ٠	784,290,812			A 6	393,801,651		(184,914,527)			<b>₩</b>	(184,914,527)	3,262,810,000	2,941,478,000
Ghent 4	<i>د</i> ه	393,801,651			9									
Green River 3	S	20,882,040			<b>ن</b> م د	20,882,040	<del>دم دم</del>	(16,658,278)			64 64	(16,658,278)	246,847,000 430,230,000	396,032,000
Green River 4	<b>₽</b>	44,909,090			,								3000	(140 000)
Haefling 1 (2)	<i>چ</i>	5,695,570			<b>د</b> م	5,695,570	٠,	(4,278,109)			<del>69</del>	(4,278,109)	32,000	
													16,000	(154,000)
Haefling 3														000 210 000
Mill Crook 1			69	163,196,129	s	163,196,129			49	(108,564,217)		(108,564,217)	2,286,876,000	
Mill Creek 2			۶.	124,822,261	s	124,822,261			<b>69</b>	(81,585,703)		(81,383,703)		
Mill Creek 3			٠,	277,074,472	۶۵	277,074,472			۵ د	(147,325,791)	9 6	(17,525,741)		
Mill Creek 4			s,	504,316,481	€9	504,316,481			A	(474,516,171,				
Ohio Falls 1 (1)	-		S	41,596,196	S	41,596,196			٠,	(7,925,585)	\$	(7,925,585)	236,214,000	230,869,000
Obje Falls 1														
S Halls	_		-		_		_		_		_		-	

	KU Gross	S	LGE Gross	L	Total Gross	KU Depr.		LGE Depr.	ĭ	Total Depr.	Test Year	Test Year
Generating	Investment (d	1) (3)	Investment (d) (3) Investment (d) (3)		Investment (d) (3)	Reserve (e) (3)		Reserve (e) (3)	Res	Reserve (e) (3)	Gross KWH	Net KWH
Unit (a)	10/31/2009	6	10/31/2009		10/31/2009	10/31/2009	6	10/31/2009		10/31/2009	Produced (g)	Produced (h)
Ohio Falls 4 Ohio Falls 5												
Ohio Falls 6					•			· · · · · · · · · · · · · · · · · · ·				
Ohio Falls 7												11974
Ohio Falls 8		***************************************										
Paddys Run 13	\$ 30,44	30,440,299	\$ 34,473,561	64	64,913,860	٠,	(7,042,761)	(8,021,545)	64	(15,064,306)	1,262,000	1,262,000
Trimble County 1			\$ 607,594,315	69	607,594,315		69	(265,212,698)	69	(265,212,698)	3,821,160,000	3,559,440,000
Trimble County 5	\$ 44,88	44,883,466	\$ 18,435,238	643	63,318,704	\$ (11,236,403)	,403) \$	(4,628,791)	۶	(15,865,194)	43,621,000	43,621,000
Trimble County 6	\$ 42,36	42,369,611	\$ 17,124,567	69	59,494,178	\$ (10,292,538)	,538) \$	(4,238,004)	69	(14,530,543)	24,504,000	24,504,000
Trimble County 7	\$ 33,01	33,018,533	\$ 19,326,392	€9	52,344,924	\$ (6,152,271)	\$ (172.		69	(6,766,519)	38,658,000	38,658,000
Trimble County 8	\$ 32,77	32,779,521	\$ 19,175,136	s,	51,954,657	\$ (6,107	(6,107,506)		643	(9,693,355)	34,284,000	34,284,000
Trimble County 9	\$ 32,88	32,886,043	\$ 19,223,229	69	52,109,272	\$ (5,865	(5,865,276)		<b>6</b> 9	(9,306,371)	23,995,000	23,995,000
Trimble County 10	\$ 36,78	36,787,164	\$ 21,650,978	69	58,438,142	\$ (6,241,514)	.514) \$	(3,730,240)	69	(9,971,753)	19,039,000	19,039,000
Tyrone 3	\$ 26,12	26,123,876		69	26,123,876	\$ (19,981,745)	,745)		69	(19,981,745)	75,836,000	68,321,000
Cane Run 11			\$ 3,249,070	<b>6</b> 9	3,249,070		69	(1,891,204)	٠,	(1,891,204)	212,000	212,000
Paddy's Run 11			\$ 1,609,957	۶.	1,609,957		<b>↔</b> (			(1,638,299)	20,000	20,000
Paddy's Run 12			\$ 3,183,011	64	3,183,011		·A	(3,396,399)	A-	(%66,0%6,6)		
Zorn I			\$ 1,899,048	S	1,899,048		٠	(1,930,481)	S	(1,930,481)	231000	231000

(1) Gross, net generation, investment, & depreciation reserve reported for Dix Dam, and Ohio Falls represents total plant. Generation is not reported on a per unit basis, and fixed asset costs are not accumulated on a per unit basis

(2) Investment, & depreciation reserve reported for Haefling represents total plant. Fixed asset costs are not accumulated on a per unit basis

(3) Investment and Depreciation Reserve is shown for active units only. This does not include structural components still in place, land, and ARO costs associated with retired units.

#### CASE NO. 2009-00548

## Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 220

Responding Witnesses: Paul W. Thompson /Shannon L. Charnas

- Q-220. For each KU and LG&E generating unit included in this rate application that was not actually in service at the end of the test year, i.e., included in CWIP, please provide the following:
  - (a) names of owners (and ownership percentages);
  - (b) type and fuels;
  - (c) total nameplate (rated) capacity (MW);
  - (d) total and individual company gross investment at the end of test year;
  - (e) total expected gross investment when ultimately placed in service; and,
  - (f) design or expected rate of each fuel type.
- A-220. The only unit that was being constructed and that was not in-service at the end of the test year was Trimble County Unit 2 (TC2). Items a-f below relate only to TC2.
  - (a) The owners and relative ownership interests are as follows:

Kentucky Utilities	60.75%
Louisville Gas and Electric	14.25%
Indiana Municipal Power Agency (IMPA)	12.88%
Illinois Municipal Electric Agency (IMEA)	12.12%

(b) The new TC2 unit is designed to use fuel oil for startup and stabilization fuel. For generation, TC2 will burn primarily Eastern bituminous coal with the sulfur content not exceeding an average of 5.5 lbs/mmBtu. The unit is also designed to burn a blend of Eastern bituminous and subbituminous (Powder River Basin) coal with the sub-bituminous content not exceeding 50% on a weighted basis.

(c) The Gross Generator Name Plate rating is 838 MW.

(d) The investments by Company at the end of the test year are:

KU \$653.5 million LG&E \$175.9 million

(e) The expected gross investment by Company when the unit is placed inservice is:

KU \$688.0 million LG&E \$182.2 million

(f) The unit's performance values are based on a 70/30 blend of bituminous/sub-bituminous coal; however, the expected rate of each coal type will vary based on market prices and availability.

### CASE NO. 2009-00548

## Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 221

Responding Witnesses: Robert M. Conroy/William Steven Seelye

- Q-221. Please provide the combined KU and LG&E generating order of dispatch by unit and basis for this order of dispatch for units in service during the test year.
- A-221. Please see the attached dispatch merit order. The dispatch merit order provided is based on unit assumptions at full load considering fuel and variable costs. The schedule is updated monthly. The schedule attached is for the month of October, 2009. Actual dispatch merit order is determined dynamically in the Energy Management System (EMS) based on heat rate curves and operating parameters for each unit.

### Attachment to Response to KU AG-1 Question No. 221 Page 1 of 1

Conroy/Seelye

MILL CREEK 1
TRIMBLE 1
MILL CREEK 4
MILL CREEK 3
MILL CREEK 2
SMITH 2
GHENT 2
GHENT 1
GHENT 4
SMITH 1
CANE RUN 4
GHENT 3
CANE RUN 6
CANE RUN 5
GR RIVER 4
GR RIVER 3
BROWN 3
BROWN 2
BROWN 1
TRIMBLE 5
TRIMBLE 6
TRIMBLE 7
TRIMBLE 8
TRIMBLE 9
TRIMBLE 10
BROWN 6
BROWN 7
BROWN 8
BROWN 9
BROWN 10
BROWN 11
BROWN 5
PADDYS RUN 13
CANE RUN 11
PADDYS RUN 12
ZORN 1
HAEFLING

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 222

Responding Witnesses: Robert M. Conroy/William Steven Seelye

- Q-222. Please provide the combined KU and LG&E generating order of dispatch by unit and basis for this order of dispatch, with the addition of all units currently included in CWIP.
- A-222. Please see the response to Question No. 221. Trimble County Unit 2 (TC2) is expected to be among the top six units in the dispatch merit order once unit commissioning is completed, along with Trimble County Unit 1 and the four Mill Creek units. However TC2 will not be included in the dispatch merit order until the unit goes in-service.

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 223

Responding Witness: William Steven Seelye

- Q-223. Please provide total system, total KU, total LG&E, and KU class contributions to each monthly system (KU + LG&E) coincident peak demand during the test year. Provide class contributions at generation voltage level. In this response please provide the date and hour of each provided observation.
- A-223. See response to KIUC-1 Question No. 31.

### **CASE NO. 2009-00548**

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 224

Responding Witness: William Steven Seelye

- Q-224. Please provide total system, total KU, total LG&E, and KU class contributions to the 24 highest system (KU + LG&E) coincident peak demands during the test year. In this response, please provide the date and hour of each provided observation.
- A-224. See page 1 of attached for system peaks; see pages 2 and 3 for class contributions to the system peaks at generation voltage level.

### Kentucky Utilities Company Case No. 2009-00548 24 Highest System Peaks

	System Load		
ObsTime	(kWh)	LGE Load	KU Load
1/16/09 8:00	6,555,000	1,915,000	4,640,000
1/16/09 7:00	6,489,000	1,923,000	4,566,000
1/16/09 9:00	6,405,000	1,884,000	4,521,000
8/10/09 15:00	6,367,000	2,479,000	3,888,000
8/10/09 14:00	6,328,000	2,454,000	3,874,000
8/10/09 16:00	6,320,000	2,468,000	3,852,000
6/25/09 14:00	6,319,000	2,524,000	3,795,000
8/10/09 13:00	6,290,000	2,470,000	3,820,000
6/25/09 15:00	6,257,000	2,521,000	3,736,000
1/16/09 10:00	6,222,000	1,864,000	4,358,000
6/25/09 13:00	6,212,000	2,484,000	3,728,000
8/10/09 17:00	6,208,000	2,407,000	3,801,000
1/16/09 6:00	6,188,000	1,821,000	4,367,000
1/15/09 20:00	6,180,000	1,918,000	4,262,000
8/10/09 12:00	6,170,000	2,406,000	3,764,000
6/19/09 14:00	6,166,000	2,421,000	3,745,000
6/25/09 16:00	6,166,000	2,510,000	3,656,000
1/15/09 19:00	6,165,000	1,921,000	4,244,000
1/21/09 7:00	6,149,000	1,804,000	4,345,000
6/19/09 15:00	6,143,000	2,412,000	3,731,000
6/25/09 12:00	6,127,000	2,452,000	3,675,000
6/26/09 14:00	6,125,000	2,473,000	3,652,000
6/19/09 13:00		2,391,000	3,731,000
1/21/09 8:00	6,120,000	1,790,000	4,330,000

Kentucky Utilities Company
Case No. 2009-00548
Class Contributions to 24 Highest System Peaks

	KU (kWh)	KU (kwh) General	KU (kWh) All Electric	KU (kWh) TOD	KU (kWh)	KU (kWh) PS	KU (kWh)	KU (kWh)	KU (kWh)
	Residential	Service		Secondary	TOD Primary	Secondary	PS Primary	Large TOD	RTS
ObsTime	~	100	140	200	210	300	320	420	009
1/16/09 8:00	2,096,351	447,135	57,095	21,426	14,959	560,717	249,182	326,239	144,228
1/16/09 7:00		398,564		22,011	13,391	551,052	237,328	325,725	135,429
1/16/09 9:00		476,169		21,566	15,480	554,106	251,985	330,492	148,363
8/10/09 15:00	_			30,826	14,855	584,301	233,491	396,203	190,572
8/10/09 14:00	1,409,451	360,313		30,693	15,536	620,916		405,342	194,484
8/10/09 16:00	` '		21,881	30,456	12,854	549,134	220,212	401,917	186,974
6/25/09 14:00	•	380,715	20,218	28,880	15,364	584,288	233,284	389,159	211,304
8/10/09 13:00	• •			30,267	14,672	634,543			
6/25/09 15:00	1,441,821			28,379	13,892	556,910	220,317		
1/16/09 10:00		479,354	52,003	21,276	14,878				156,038
6/25/09 13:00	1,277,766			28,457	14,153	598,003	244,798	401,035	
8/10/09 17:00	•			29,302					
1/16/09 6:00				20,849	14,035	511,873			125,340
1/15/09 20:00		317,567		21,758	12,639				
8/10/09 12:00									203,597
6/19/09 14:00		330,755		29,255	11,115	551,975	219,754		
6/25/09 16:00	, ,			28,124					193,996
1/15/09 19:00	1,905,760	337,810		22,229	12,428		229,016		
1/21/09 7:00	` '	391,511		22,104	•		, ,		162,465
6/19/09 15:00		313,508	14,895	29,264	11,298	536,666	212,414	384,497	188,979
6/25/09 12:00	_	412,624	20,526	28,157	15,072	608,020	250,273	-	
6/26/09 14:00	<b>(-1</b>	339,624	18,198	28,579	9,535	546,500	211,892	370,123	195,518
6/19/09 13:00	1,370,646	357,247	16,833	29,086	-			•	• •
1/21/09 8:00	<b>~</b>	416,984	56,405	21,785	15,257	599,124	256,888	364,520	168,390

# Attachment to Response to KU AG-1 Question No. 224 Page 2 of 3 Seelye

Kentucky Utilities Company
Case No. 2009-00548
Class Contributions to 24 Highest System Peaks

	KU (kWh) Ind Service	KU (kWh)	KU (kWh) Muni	KU (kWh)	KU (kWh)	KU (kWh)	KU (kWh) Company
	Trans.	Muni Primary	Secondary	Paris	ODP		Use
				,	ļ	Street	•
ObsTime	620	200	710	720	730	Lighting	800
1/16/09 8:00	39,823	96,875	254,347	24,992	302,442		4,191
1/16/09 7:00	1,792	95,429	252,269	22,629	297,993	31,510	3,991
1/16/09 9:00	39,657	860'86	250,029	25,864	291,871		) 4,238
8/10/09 15:00	61,792	107,197	242,630	24,774	151,319	_	3,927
8/10/09 14:00	32,257	107,229	242,346	24,999	151,210		) 4,205
8/10/09 16:00		105,531	237,014	24,486	151,791		3,704
6/25/09 14:00	968'99	106,459	239,968	22,324	136,430	_	3,923
8/10/09 13:00	166	106,587	232,597	23,805	166,544		0 4,429
6/25/09 15:00	46,792	106,320	240,127	22,051	129,203		3,705
1/16/09 10:00	1,759	97,415	242,461	25,105	278,070	_	) 4,246
6/25/09 13:00		106,046	235,128	22,649	140,153		) 4,117
8/10/09 17:00	61,626	103,724	228,041	12,778	151,063		3,631
1/16/09 6:00	1,726	90,280	236,887	13,523	280,783	31,510	
1/15/09 20:00	37,931	96,515	230,786	22,530	263,828	31,510	
8/10/09 12:00		103,176	226,006	12,398	148,570		) 4,474
6/19/09 14:00	62,509	105,005	233,926	23,635	135,080	_	3,696
6/25/09 16:00	48,982	105,426	233,649	21,379	128,158		3,511
1/15/09 19:00	34,712	96,486	232,370	22,489	257,206	31,510	3,852
1/21/09 7:00	43,772	90,253	238,442	13,493	259,922	31,510	
6/19/09 15:00	39,392	105,563	233,937	23,495	134,679		3,572
6/25/09 12:00	2,566	104,018	230,676	13,130	131,917		4,209
6/26/09 14:00	46,759	107,902	229,818	11,436	156,093		3,564
6/19/09 13:00	49,812	104,721	231,032	22,662	131,512		3,835
1/21/09 8:00	60,465	91,261	239,101	13,569	277,273		4,320

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 225

Responding Witnesses: Robert M. Conroy/William Steven Seelye

- Q-225. For each KU and LG&E generating unit, please provide all forced (unscheduled) outages (dates, time, and duration) by unit during the test year.
- A-225. Please see the attached. The schedule includes both forced outages and maintenance outages by unit.

Attachment to Response to KU AG-1 Question No. 225

		Attac	innent to nesp	Dans 1 of 10
Unit	Event	Event	Event	Page 1 of 19
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	Conroy / Seelye
Dm.	40/40/00 44 50	40/44/00 40 00	05.40	
BR1	12/13/08 11:52	12/14/08 13:00	25.13	
BR1	12/23/08 20:33	12/24/08 15:45	19.20	
BR1	2/6/09 8:53	2/17/09 20:41	275.80	
BR1	2/18/09 16:07	2/18/09 17:06	0.98	
BR1	3/5/09 17:02	3/6/09 16:09 3/23/09 13:30	23.12	
BR1	3/23/09 5:40 3/27/09 6:30	3/27/09 17:40	7.83	
BR1			11.17 34.18	
BR1 BR1	5/2/09 9:34 5/6/09 9:00	5/3/09 19:45 5/8/09 19:23	58.38	
BR1	6/21/09 6:12	6/21/09 7:13	1.02	
BR1	7/10/09 20:01	7/10/09 22:13	2.20	
BR1	7/22/09 0:01	7/22/09 21:55	21.90	
BR1	7/23/09 4:00	7/23/09 5:20	1.33	
DICT	1125105 4.00	1123103 3.20	1.00	
BR2	12/5/08 15:45	12/7/08 15:39	47.90	
BR2	12/29/08 21:04	12/30/08 4:39	7.58	
BR2	1/12/09 4:25	1/12/09 6:30	2.08	
BR2	4/18/09 2:45	4/19/09 2:31	23.77	
BR2	4/19/09 2:31	4/19/09 8:48	6.28	
BR2	4/19/09 10:30	4/19/09 14:36	4.10	
BR2	4/27/09 14:57	4/28/09 1:57	11.00	
BR2	4/28/09 2:03	4/28/09 2:46	0.72	
BR2	4/28/09 9:43	4/29/09 21:07	35.40	
BR2	4/29/09 21:16	4/29/09 22:03	0.78	
BR2	5/28/09 21:42	6/1/09 9:02	83.33	
BR2	6/28/09 0:31	6/29/09 1:48	25.28	
BR2	7/22/09 0:01	7/22/09 21:55	21.90	
bpa	40/00/08 00:30	40/24/00 24.40	40.00	
BR3	12/29/08 20:39	12/31/08 21:40	49.02	
BR3	2/18/09 0:53 2/24/09 23:47	2/19/09 5:07 2/26/09 19:17	28.23	
BR3		5/20/09 19:17	43.50	
BR3	5/20/09 2:43 5/20/09 19:43		16.97	
BR3		5/20/09 20:08	0.42	
BR3	6/4/09 14:30 6/5/09 3:30	6/4/09 18:05 6/5/09 13:45	3.58	
BR3		6/16/09 5:27	10.25	
BR3	6/15/09 14:56		14.52	
BR3	6/24/09 17:03 7/6/09 7:40	7/6/09 2:15 7/6/09 23:05	273.20 15.42	
BR3	8/24/09 6:11	8/25/09 7:03	24.87	
BR3	8/25/09 7:03	8/25/09 21:07	14.07	
BR3	9/18/09 18:08	9/25/09 23:36	173.47	
BR3	9/28/09 9:24	9/28/09 14:50	5,43	
BR3 BR3	10/29/09 20:33	11/1/09 5:46	57.22	
вкэ	10/29/09 20:33	11/1/09 3:40	31.22	
BR5	11/6/08 13:00	11/6/08 15:48	2.80	
BR5	11/7/08 9:15	11/7/08 12:29	3.23	
BR5	12/18/08 10:00	12/18/08 14:45	4.75	
BR5	12/19/08 7:11	12/19/08 15:46	8,58	
BR5	12/31/08 6:30	12/31/08 15:13	8.72	
BR5	1/2/09 7:00	1/2/09 14:30	7,50	
BR5	1/5/09 6:30	1/5/09 13:05	6.58	
BR5	1/8/09 8:15	1/8/09 12:38	4.38	
BR5	1/9/09 10:07	1/9/09 11:15	1.13	

Attachment to Response to KU AG-1 Question No. 225

Unit	Event	Event	Event	Page 2 of 19
<u>Name</u>	Start	End	Hours	Conroy / Seelye
BR5	1/15/09 18:35	1/15/09 19:12	0.62	
BR5	1/17/09 7:50	1/17/09 12:45	4.92	
BR5	1/17/09 18:12	1/18/09 8:25	14.22	
BR5	2/3/09 7:15	2/3/09 14:39	7.40	
BR5	3/3/09 3:25	3/3/09 7:41	4.27	
BR5	10/16/09 12:33	10/21/09 14:30	121.95	
BR6	11/3/08 6:30	11/6/08 6:00	71.50	
BR6	11/6/08 6:00	11/6/08 16:00	10.00	
BR6	11/8/08 8:00	11/8/08 9:42	1.70	
BR6	11/10/08 8:26	11/10/08 13:03	4.62	
BR6	11/25/08 14:38	11/25/08 17:15	2.62	
BR6	11/26/08 10:20	11/26/08 13:00	2.67	
BR6	12/16/08 6:30	12/19/08 15:46	81.27	
BR6	1/6/09 7:30	1/6/09 14:00	6.50	
BR6	1/19/09 7:00	1/19/09 19:30	12.50	
BR6	2/5/09 5:10	2/5/09 6:16	1.10	
BR6	2/6/09 6:40	2/6/09 6:55	0.25	
BR6	2/6/09 7:40	2/6/09 17:45	10.08	
BR6	2/9/09 7:00	2/9/09 14:43	7.72	
BR6	2/10/09 7:00	2/10/09 14:30	7.50	
BR6	2/23/09 5:26	2/23/09 5:43	0.28	
BR6	3/3/09 3:07	3/3/09 5:54	2.78	
BR6	3/5/09 7:30	3/5/09 13:34	6.07	
BR6	3/12/09 9:40	3/12/09 14:30	4.83	
BR6	5/12/09 11:35	5/12/09 13:20	1.75	
BR6	5/14/09 9:15	5/14/09 10:15	1.00	
BR6	5/14/09 13:10	5/27/09 6:30	305.33	
BR6	5/28/09 6:00	5/28/09 14:00	8.00	
BR6	6/16/09 7:30	6/16/09 10:23	2.88	
BR6	6/25/09 9:29	6/25/09 10:28	0.98	
BR6	8/4/09 5:51	8/4/09 6:36	0.75	
BR6	8/5/09 11:05	8/5/09 14:20	3.25	
BR6	8/12/09 18:00	8/15/09 6:05	60.08	
BR6	8/15/09 6:52	9/14/09 13:21	726.48	
BR6	9/14/09 21:21	9/16/09 13:31	40.17	
BR6	9/16/09 14:16	9/21/09 14:37	120.35	
BR6	9/21/09 14:48	9/21/09 15:36	0.80	
BR6	9/21/09 16:39	9/22/09 12:15	19.60	
BR6	9/22/09 21:05	9/23/09 11:25	14.33	
BR6	10/14/09 5:30	10/16/09 16:00	58.50	
BR6	10/28/09 9:00	11/5/09 15:49	198.82	
BR7	12/9/08 6:30	12/9/08 10:30	4.00	
BR7	12/22/08 7:44	12/22/08 12:31	4.78	
BR7	2/5/09 5:30	2/5/09 6:14	0.73	
BR7	2/6/09 6:14	2/6/09 6:48	0.57	
BR7	2/12/09 7:00	2/12/09 14:45	7.75	
BR7	3/12/09 7:20	3/12/09 9:40	2.33	
BR7	3/27/09 6:00	3/27/09 8:00	2.00	
BR7	4/2/09 6:00	4/3/09 18:00	36.00	
BR7	4/6/09 6:00	4/6/09 20:00	14.00	
BR7	4/21/09 6:00	4/21/09 7:50	1.83	

			, , , , , , , , , , , , , , , , , , ,	Page 3 of 19
Unit	Event	Event	Event	Conroy / Seelye
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	Conroy / Seeiye
BR7	4/30/09 9:49	4/30/09 14:50	5.02	
BR7	6/30/09 5:55	6/30/09 12:42	6.78	
BR7	7/1/09 6:30	7/1/09 13:00	6.50	
BR7	8/22/09 6:09	8/22/09 15:00	8.85	
BR7	8/22/09 15:00	9/4/09 15:30	312.50	
BR7	9/12/09 11:00	9/17/09 14:33	123.55	
BR7	10/15/09 8:30	10/15/09 10:22	1.87	
BR7	10/21/09 11:12	10/21/09 12:33	1.35	
BR8	11/11/08 7:40	11/12/08 14:42	31.03	
BR8	12/16/08 7:40	12/16/08 15:35	7.92	
BR8	1/13/09 16:40	1/13/09 19:43	3.05	
BR8	1/13/09 19:47	1/13/09 20:01	0.23	
BR8	1/22/09 9:15	1/22/09 14:00	4.75	
BR8	2/10/09 11:10	2/10/09 13:30	2.33	
BR8	5/18/09 8:30	5/18/09 11:15	2.75	
BR8	5/29/09 6:00	5/29/09 12:09	6.15	
BR8	6/3/09 12:15	6/4/09 7:08	18.88	
BR8	6/9/09 5:30	6/10/09 13:00	31.50	
BR8	8/20/09 9:30	8/20/09 10:47	1.28	
BR8	9/11/09 6:00	9/11/09 10:10	4.17	
BR8	10/19/09 6:30	10/27/09 16:54	202.40	
BR9	12/10/08 8:30	12/10/08 14:00	5.50	
BR9	1/23/09 9:40	1/23/09 14:07	4.45	
BR9	2/4/09 6:40	2/4/09 8:48	2.13	
BR9	2/20/09 6:15	2/20/09 9:10	2.92	
BR9	3/3/09 3:07	3/3/09 11:20	8.22	
BR9	4/24/09 6:05	4/24/09 12:20	6.25	
BR9	6/9/09 5:30	6/10/09 13:00	31.50	
BR9	6/24/09 17:30	6/25/09 13:44	20.23	
BR9	6/26/09 9:03	6/26/09 12:27	3.40	
BR9	8/20/09 11:37	8/20/09 13:28	1.85	
BR9	8/25/09 12:00	8/26/09 10:25	22.42	
BR9	8/28/09 6:00	8/28/09 9:45	3.75	
BR9	10/7/09 8:32	10/7/09 9:24	0.87	,
BR9	10/7/09 9:24	10/7/09 10:02	0.63	
BB40	4440/00 7:00	4444400 40:40	20.47	
BR10	11/13/08 7:30	11/14/08 13:40	30.17	
BR10	12/16/08 8:00	12/16/08 8:19	0.32	
BR10	1/21/09 13:00	1/21/09 13:42	0.70	
BR10	2/24/09 13:15	2/25/09 16:30	27.25	
BR10	2/25/09 16:30	2/26/09 16:21	23.85	
BR10	4/13/09 6:00	4/13/09 11:38	5.63	
BR10	6/30/09 16:36	6/30/09 20:30	3.90	
BR10	8/21/09 12:11	8/21/09 13:21	1.17	
BR10	10/8/09 6:15	10/9/09 13:30	31.25	
BR11	11/21/08 6:00	11/21/08 15:30	9.50	
BR11	2/10/09 7:00	2/10/09 11:00	4.00	
BR11	2/17/09 6:50	2/17/09 7:30	0.67	
BR11	3/17/09 17:00	3/18/09 6:22	13.37	
BR11	4/27/09 7:44	4/27/09 8:11	0.45	
BR11	6/1/09 7:00	6/1/09 8:00	1.00	
BR11	6/20/09 9:00	6/20/09 11:52	2.87	
DD44	6/20/00 20:10	6/20/00 13:40	17.50	

BR11

6/28/09 20:10

6/29/09 13:40

17.50

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		Attaci	ment to response t	
Unit	Event	Event	Event	
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	
DD44	9/24/00 40:02	9/24/00 42:44	2.42	
BR11 BR11	8/21/09 10:03 10/7/09 7:05	8/21/09 12:11 10/7/09 8:18	2.13 1.22	
BR11	10/12/09 5:30	10/12/09 7:52	2.37	
Ditti	10, 12,00	10712001.02	a	
CR4	1/9/09 22:10	1/11/09 10:49	36.65	
CR4	1/11/09 10:59	1/11/09 11:58	0.98	
CR4	1/11/09 12:34	1/11/09 13:43	1.15	
CR4	1/12/09 5:28	1/13/09 9:15	27.78	
CR4	1/23/09 21:15	1/25/09 6:23	33.13	
CR4	2/21/09 21:12	2/21/09 21:28	0.27	
CR4	5/1/09 21:24	5/4/09 2:37	53.22	
CR4	5/4/09 2:37	5/4/09 3:32	0.92	
CR4 CR4	5/13/09 3:51 5/17/09 1:50	5/14/09 0:04 5/17/09 11:40	20.22 9.83	
CR4	5/17/09 11:40	5/17/09 11:40	5.22	
CR4	8/4/09 8:46	8/5/09 11:44	26.97	
CR4	8/16/09 6:03	8/16/09 7:07	1.07	
CR4	8/17/09 2:46	8/18/09 5:26	26.67	
CR4	8/18/09 5:37	8/18/09 7:20	1.72	
CR4	9/1/09 21:37	9/4/09 7:54	58.28	
CR4	9/11/09 7:03	9/12/09 12:46	29.72	
CR4	9/12/09 22:18	9/13/09 16:42	18.40	
CR4	9/13/09 16:42	9/15/09 4:20	35.63	
CR4	9/15/09 5:04	9/15/09 5:48	0.73	
CR4	9/15/09 6:48	9/15/09 8:22	1.57	
CR5	11/4/08 16:19	11/4/08 18:33	2.23	
CR5	11/8/08 13:26	11/8/08 14:29	1.05	
CR5 CR5	12/6/08 21:59 12/16/08 14:40	12/7/08 23:49 12/19/08 9:37	25.83 66.95	
CR5	1/2/09 8:27	1/3/09 3:30	19,05	
CR5	1/5/09 6:29	1/5/09 8:04	1.58	
CR5	1/28/09 6:01	1/28/09 7:21	1.33	
CR5	1/28/09 10:05	1/28/09 11:57	1.87	
CR5	3/10/09 6:36	3/10/09 14:58	8.37	
CR5	3/24/09 7:33	3/25/09 23:23	39.83	
CR5	5/14/09 18:15	5/14/09 23:16	5.02	
CR5	5/14/09 23:16	5/14/09 23:40	0.40	
CR5	5/14/09 23:41	5/15/09 0:00	0.32	
CR5	8/4/09 8:43	8/6/09 8:45	48.03	
CR5	8/6/09 12:16	8/6/09 16:43	4.45	
CR5	8/10/09 18:08	8/11/09 6:16	12.13	
CR5	8/12/09 15:13	8/13/09 7:04	15.85	
CR5	8/23/09 18:42	8/24/09 1:16	6.57	
CR5 CR5	9/9/09 8:15 9/13/09 16:39	9/11/09 2:47 9/15/09 6:34	42.53 37.92	
CR5	10/5/09 23:46	10/6/09 7:51	8.08	
CR5	10/10/09 8:00	10/10/09 13:00	5.00	
CR5	10/20/09 0:00	10/20/09 8:00	8.00	
0			5.55	
CR6	11/28/08 18:57	12/1/08 11:15	64.30	
CR6	12/1/08 11:15	12/2/08 11:00	23.75	
CR6	12/2/08 11:00	12/3/08 2:10	15.17	
CR6	12/3/08 2:10	12/3/08 14:30	12.33	
CR6	12/3/08 14:30	12/5/08 18:58	52.47	
CR6	12/12/08 1:26	12/12/08 2:19	0.88	

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Unit	Event	Event	Event	Conroy / Seelye
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	Conroy / Seeiye
CR6	12/16/08 6:56	12/19/08 4:56	70.00	
CR6	12/19/08 5:07	12/19/08 6:40	1.55	
CR6	12/20/08 0:13	12/20/08 1:01	0.80	
CR6	12/27/08 20:11	12/28/08 1:45	5.57	
CR6	1/2/09 23:17	1/4/09 3:42	28.42	
CR6	1/24/09 15:43	1/28/09 21:00	101.28	
CR6	1/28/09 21:00	1/29/09 4:00	7.00	
CR6	2/2/09 11:04	2/4/09 12:52	49.80	
CR6	2/11/09 16:45	2/11/09 17:28	0.72	
CR6	2/18/09 14:12	2/18/09 16:05	1.88	
CR6	2/23/09 10:18	2/25/09 14:25	52.12	
CR6	3/6/09 21:19	3/8/09 18:25	45.10	
CR6	3/17/09 22:29	3/18/09 7:30	9.02	
CR6	3/18/09 7:30	3/21/09 0:00	64.50	
CR6	4/9/09 13:29	4/10/09 11:41	22.20	
CR6	4/17/09 23:20	4/18/09 15:04	15.73	
CR6	4/28/09 22:14	5/1/09 13:43	63.48	
CR6	5/1/09 13:43	5/1/09 14:39	0.93	
CR6	5/20/09 10:36	5/24/09 3:15	88.65	
CR6	6/25/09 6:57	6/25/09 17:49	10.87	
CR6	6/27/09 2:16	6/27/09 18:23	16.12	
CR6	7/8/09 7:40	7/9/09 7:58	24.30	
CR6	7/9/09 8:01	7/9/09 8:39	0.63	
CR6	7/9/09 22:53	7/10/09 22:18	23.42	
CR6	7/12/09 16:55	7/12/09 18:17	1.37	
CR6	8/4/09 8:45	8/7/09 4:17	67.53	
CR6	8/14/09 21:02	8/17/09 6:02	57.00	
CR6	8/28/09 9:13	8/28/09 10:50	1.62	
CR6	9/1/09 23:13	9/2/09 2:33	3.33	
CR6	9/13/09 16:42	9/16/09 6:13	61.52	
CR6	9/21/09 13:22	9/21/09 14:17	0.92	
CR6	10/22/09 11:35	10/29/09 17:19	173.73	
CR11	12/24/08 13:04	12/29/08 22:50	129.77	
CR11	12/29/08 23:15	12/30/08 11:34	12.32	
CR11	1/12/09 8:00	1/12/09 13:30	5.50	
CR11	1/16/09 5:04	1/16/09 13:00	7.93	
CR11	1/28/09 11:00	1/28/09 13:17	2.28	
CR11	2/3/09 10:00	2/3/09 13:26	3.43	
CR11	2/4/09 7:47	2/4/09 8:59	1.20	
CR11	6/19/09 20:45	6/20/09 0:35	3.83	
CR11	6/20/09 20:40	6/21/09 8:30	11.83	
CR11	6/21/09 16:30	6/22/09 13:42	21.20	
CR11	6/22/09 14:40	6/24/09 11:25	44.75	
CR11	7/22/09 6:00	7/23/09 12:45	30.75	
CR11	8/5/09 2:00	8/5/09 8:13	6.22	
GH1	12/26/08 0:13	12/27/08 16:15	40.03	
GH1	1/11/09 20:32	1/27/09 0:01	363.48	
GH1	2/26/09 8:47	2/27/09 9:49	25.03	
GH1	2/27/09 11:09	2/27/09 18:24	7.25	
GH1	3/10/09 10:32	3/12/09 0:08	37.60	
GH1	5/24/09 14:21	5/24/09 18:27	4.10	
GH1	5/24/09 19:26	5/24/09 20:52	1.43	
GH1	5/30/09 19:45	5/31/09 23:47	28.03	
CH1	7/17/00 20:52	7/25/00 17:00	199 10	

GH1

7/17/09 20:53

7/25/09 17:00

188.12

		Attac	nment to Resp	onse to KU AG-1 Question No. 225
Unit	Event	Event	Event	Page 6 of 19
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	Conroy / Seelye
GH1	7/25/09 17:00	7/27/09 3:04	34.07	
GH1	8/23/09 2:59	8/23/09 6:12	3.22	
GH1	9/4/09 16:09	9/6/09 6:37	38.47	
GH1	9/29/09 21:25	10/2/09 17:25	68.00	
GH1	10/19/09 2:42	10/19/09 4:12	1.50	
GH2	12/24/08 1:23	12/26/08 6:55	53.53	
GH2	1/24/09 16:50	1/26/09 0:39	31.82	
GH2	2/4/09 1:55	2/5/09 3:48	25.88	
GH2	2/14/09 11:50	2/15/09 23:28	35.63	
GH2	2/23/09 14:00	2/24/09 12:48	22.80	
GH2	5/16/09 12:09	5/16/09 12:21	0.20	
GH2	5/16/09 16:03	5/16/09 16:57	0.90	
GH2	5/17/09 2:39	5/17/09 16:33	13.90	
GH2	5/19/09 5:15	5/19/09 5:56	0.68	
GH2	5/19/09 16:07	5/19/09 16:47	0.67	
GH2	5/20/09 0:51	5/21/09 9:50	32.98	
GH2	5/22/09 19:59	5/22/09 22:32	2.55	
GH2	5/23/09 0:06	5/23/09 0:48	0.70	
GH2	6/11/09 4:20	6/11/09 5:28	1.13	
GH2	6/12/09 22:27	6/14/09 2:00	27.55	
GH2	7/3/09 22:03	7/4/09 20:23	22.33	
GH2	7/25/09 0:29	7/26/09 23:06	46.62	
GH2	9/20/09 6:02	9/20/09 15:20	9.30	
GH3	11/9/08 4:31	11/9/08 8:37	4.10	
GH3	11/9/08 9:50	11/9/08 10:54	1.07	
GH3	11/11/08 1:40	11/12/08 22:31	44.85	
GH3	11/26/08 23:17	11/27/08 21:14	21.95	
GH3	12/19/08 22:50	12/20/08 22:55	24.08	
GH3	1/5/09 12:21	1/7/09 22:02	57.68	
GH3	2/27/09 3:55	2/27/09 7:23	3.47	
GH3	3/11/09 1:17	3/11/09 3:30	2.22	
GH3	3/11/09 11:37	3/11/09 13:23	1.77	
GH3	3/17/09 8:58	3/20/09 6:54	69.93	
GH3	3/20/09 23:34	3/21/09 16:03	16.48	
GH3	5/8/09 22:16	5/10/09 4:16	30.00	
GH3	7/9/09 21:28	7/11/09 12:41	39.22	
GH3	7/30/09 22:23	8/2/09 18:44	68.35	
GH3	10/23/09 9:22	10/23/09 10:22	1.00	
GH4	11/15/08 23:56	11/17/08 0:45	24.82	
GH4	12/31/08 23:30	1/1/09 0:00	0.50	
GH4	1/1/09 0:00	1/2/09 0:56	24.93	
GH4	2/13/09 23:17	2/15/09 3:09	27.87	
GH4	2/15/09 3:22	2/15/09 4:16	0.90	
GH4	2/28/09 3:31	2/28/09 7:02	3.52	
GH4	3/13/09 21:10	3/14/09 20:50	23.67	
GH4	4/23/09 22:22	4/26/09 3:22	53.00	
GH4	6/30/09 14:44	7/3/09 18:31	75.78	
GH4	7/10/09 8:37	7/14/09 1:29	88.87	
GH4	7/14/09 2:29	7/14/09 3:28	0.98	
GH4	7/29/09 21:58	7/30/09 5:00	7.03	
GH4	8/3/09 23:12	8/4/09 0:57	1.75	
GH4	8/4/09 3:42	8/4/09 4:58	1.27	
GH4	10/26/09 16:14	10/26/09 22:01	5.78	

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Unit	Event	Event	Event
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>
GH4	10/27/09 4:58	10/27/09 15:07	10.15
GR3	12/29/08 10:00	12/29/08 12:28	2.47
GR3	12/30/08 9:20	12/30/08 13:20	4.00
GR3	1/17/09 0:04	1/30/09 15:15	327.18
GR3	1/30/09 15:15	2/3/09 8:07	88.87
GR3	2/3/09 8:07	2/3/09 12:45	4.63
GR3	2/6/09 2:47	2/6/09 4:42	1.92
GR3	2/6/09 5:07	2/6/09 6:18	1.18
GR3	2/20/09 2:31	2/21/09 4:10	25.65
GR3	3/2/09 23:04	3/3/09 23:52	24.80
GR3	4/12/09 22:28	4/22/09 20:15	237.78
GR3	4/29/09 2:16	4/29/09 5:43	3.45
GR3	6/17/09 21:05	6/17/09 23:38	2.55
GR3	8/5/09 9:50	8/6/09 9:49	23.98
GR3	8/16/09 22:23	8/18/09 8:27	34.07
GR4	11/23/08 10:11	11/24/08 10:01	23.83
GR4	12/6/08 17:47	12/7/08 18:25	24.63
GR4	12/16/08 18:48	12/17/08 17:56	23.13
GR4	1/12/09 5:45	1/12/09 13:49	8.07
GR4	1/12/09 17:41	1/12/09 18:53	1.20
GR4	1/17/09 11:18	1/18/09 15:40	28.37
GR4	1/28/09 7:54	2/2/09 4:14	116.33
GR4	2/13/09 17:38	2/14/09 22:00	28.37
GR4	3/14/09 13:05	3/14/09 23:50	10.75
GR4	3/18/09 23:30	3/19/09 10:06	10.60
GR4	4/7/09 14:05	4/8/09 18:53	28.80
GR4	4/8/09 20:30	4/8/09 22:02	1.53
GR4	4/9/09 13:42	4/9/09 20:14	6.53
GR4	6/12/09 8:45	6/12/09 15:13	6.47
GR4	8/2/09 2:47	8/3/09 6:51	28.07
GR4	8/29/09 13:12	8/29/09 23:10	9.97
GR4	9/2/09 21:53	9/3/09 7:13	9.33
GR4	9/20/09 2:11	9/20/09 12:02	9.85
GR4	10/2/09 15:08	10/2/09 21:30	6.37
GR4	10/2/09 21:30	11/4/09 0:09	770.65
MC1	11/8/08 18:43	11/10/08 3:55	33.20
MC1	11/10/08 9:38	11/11/08 6:30	20.87
MC1	12/16/08 8:36		30.62
MC1	1/22/09 0:38	1/23/09 23:13	46.58
MC1	1/23/09 23:23	1/23/09 23:57	0.57
MC1	2/1/09 7:54	2/1/09 8:31	0.62
MC1	2/1/09 8:46	2/1/09 11:54	3.13
MC1	3/4/09 6:58	3/5/09 2:17	19,32
MC1	3/10/09 20:00	3/12/09 1:43	29.72
MC1	4/22/09 22:08	4/24/09 7:07	32.98
MC1	5/17/09 7:58	5/19/09 22:54	62.93
MC1	5/19/09 22:54	5/20/09 8:10	9.27
MC1	5/22/09 13:26 5/24/09 3:10	5/24/09 2:27 5/24/09 3:54	37.02 0.73
MC1 MC1	6/12/09 0:43	6/12/09 2:54	2.18
MC1	7/10/09 16:44		28.58
MC1	7/22/09 18:26		51.97
MC1	7/24/09 23:18	7/24/09 23:49	0.52

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Conroy / Seelye

Unit <u>Name</u>	Event <u>Start</u>	Event <u>End</u>	Event Hours
MC1	8/11/09 5:05	8/12/09 17:54	36.82
MC2	11/19/08 11:24	11/20/08 11:45	24.35
MC2	11/20/08 11:45	11/22/08 10:33	46.80
MC2	1/28/09 3:59	1/28/09 4:44	0.75
MC2	2/6/09 23:42	2/9/09 7:23	55.68
MC2	2/26/09 9:48	2/27/09 14:31	28.72
MC2	4/3/09 17:50	4/6/09 7:55	62.08
MC2	4/6/09 7:55	4/6/09 21:04	13.15
MC2	5/24/09 5:29	5/25/09 14:10	32.68
MC2	6/12/09 12:07	6/14/09 11:26	47.32
MC2	6/20/09 9:00	6/21/09 22:09	37.15
MC2	7/17/09 8:33	7/17/09 21:30	12.95
MC2	7/17/09 21:30	7/18/09 21:45	24.25
MC2	8/17/09 0:35	8/17/09 8:55	8.33
MC2	8/28/09 21:44	8/31/09 8:03	58.32
MC2	8/31/09 13:12	9/1/09 3:02	13.83
MC2	10/17/09 15:37	10/19/09 0:47	33.17
МС3	12/13/08 4:29	12/13/08 6:13	1.73
MC3	12/16/08 6:08	12/19/08 2:43	68.58
MC3	1/2/09 22:10	1/4/09 3:26	29.27
мсз	1/6/09 0:10	1/6/09 1:11	1.02
MC3	1/13/09 18:29	1/15/09 0:36	30.12
MC3	1/17/09 13:38	1/18/09 15:27	25.82
MC3	3/5/09 17:54	3/5/09 22:46	4.87
мсз	3/5/09 22:53	3/5/09 23:56	1.05
MC3	3/6/09 1:11	3/6/09 4:44	3.55
мсз	6/15/09 9:09	6/17/09 8:40	47.52
мсз	6/17/09 8:40	6/18/09 3:43	19.05
МСЗ	6/22/09 22:51	6/24/09 12:09	37.30
МСЗ	7/7/09 23:28	7/10/09 6:03	54.58
мсз	7/10/09 7:30	7/10/09 11:25	3.92
мсз	7/17/09 22:45	7/20/09 1:09	50.40
мсз	7/20/09 17:53	7/20/09 19:32	1.65
мсз	7/25/09 14:09	7/27/09 8:00	41.85
МСЗ	9/24/09 6:03		1.63
MC3	9/30/09 2:15	9/30/09 5:25	3.17
MC3	10/7/09 8:49		45.80
МСЗ	10/15/09 4:04	10/15/09 8:35	4.52
MC4	11/21/08 17:38	11/21/08 22:00	4.37
MC4	11/21/08 22:00	11/22/08 3:28	5.47
MC4	11/22/08 11:19	11/23/08 6:53	19.57
MC4	12/26/08 2:36	12/29/08 7:45	77.15
MC4	2/26/09 19:55	2/27/09 12:00	16.08
MC4	4/28/09 13:54	4/28/09 21:00	7.10
MC4	4/28/09 22:03	4/29/09 0:24	2.35
MC4	4/29/09 1:30	4/29/09 12:09	10.65
MC4	5/1/09 8:26	5/1/09 11:55	3.48
MC4	5/1/09 23:31	5/4/09 1:31	50.00
MC4	5/23/09 2:51	5/23/09 6:14	3.38
MC4	5/23/09 6:19	5/23/09 7:04	0.75
MC4	6/28/09 0:09	6/28/09 2:33	2.40
MC4	7/23/09 0:52	7/25/09 1:51	48.98
MC4	8/21/09 13:10	8/23/09 1:21	36.18

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Conroy / Seelye

Unit <u>Name</u>	Event <u>Start</u>	Event <u>End</u>	Event <u>Hours</u>	
MC4	9/25/09 21:43	9/29/09 7:12	81.48	
MC4	10/23/09 22:37	10/25/09 2:29	27.87	
MC4	10/25/09 2:32	10/25/09 3:33	1.02	
OF1	10/30/08 9:00	11/15/08 10:00	385.00	
OF1	11/17/08 10:10	11/18/08 10:15	24.08	
OF1	11/21/08 14:00	11/26/08 10:21	116.35	
OF1	12/1/08 8:12	12/1/08 8:21	0.15	
OF1	12/2/08 17:32	12/4/08 9:09	39.62	
OF1	12/6/08 4:05	12/8/08 9:06	53.02	
OF1	12/10/08 9:41	12/11/08 9:14	23.55	
OF1	12/14/08 13:10	12/17/08 14:32	73.37	
OF1	12/21/08 8:50	12/26/08 0:00	111.17	
OF1	12/26/08 0:00	12/31/08 12:00	132.00	
OF1	12/31/08 12:00	1/1/09 0:00	12.00	
OF1	1/1/09 0:00	1/5/09 14:52	110.87	
OF1	1/9/09 6:18	1/15/09 13:51	151.55	
OF1	1/29/09 12:57	2/12/09 0.00	323.05	
OF1	2/12/09 0:00	2/19/09 14:13	182.22	
OF1	2/20/09 14:27	3/23/09 9:28	739.02	
OF1	3/27/09 8:26	3/27/09 8:55	0.48	
OF1	3/29/09 6:20	3/30/09 13:30	31.17	
OF1	4/4/09 9:08	4/13/09 13:14	220.10	
OF1	4/13/09 13:14	4/17/09 12:27	95.22	
OF1	4/22/09 14:08	4/26/09 12:06	93.97	
OF1	5/1/09 9:24	5/6/09 6:00	116.60	
OF1	5/6/09 6:00	5/17/09 7:49	265.82	
OF1	5/25/09 15:58	6/2/09 11:56	187.97	
OF1	6/13/09 10:03	6/17/09 13:13	99.17	
OF1 OF1	6/20/09 12:45 6/21/09 6:25	6/21/09 6:25 7/2/09 7:18	17.67 264.88	
OF1	7/2/09 7:18	7/6/09 9:52	98.57	
OF1	7/8/09 21:02	7/26/09 12:25	423.38	
OF1	7/26/09 12:27	7/26/09 12:52	0.42	
OF1	7/29/09 12:04	7/29/09 13:53	1.82	
OF1	7/31/09 12:33	8/7/09 12:06	167.55	
OF1	8/13/09 9:10	9/1/09 7:30	454.33	
OF1	9/1/09 7:30	9/28/09 7:21	647.85	
OF1	10/6/09 1:10	10/15/09 7:37	222.45	
OF1	10/15/09 17:33	10/16/09 7:48	14.25	
OF1	10/26/09 13:29	10/29/09 10:34	69.08	
OF1	10/30/09 11:48	10/30/09 13:56	2.13	
OF2	8/4/08 6:44	12/11/08 11:05	3,100.35	
OF2	12/11/08 11:05	12/12/08 10:15	23.17	
OF2	12/15/08 9:52	12/17/08 14:05	52.22	
OF2	12/22/08 13:18	12/26/08 0:00	82.70 133.00	
OF2 OF2	12/26/08 0:00 12/31/08 12:00	12/31/08 12:00 1/1/09 0:00	132.00	
OF2 OF2	1/1/09 0:00	1/5/09 14:22	12.00 110.37	
OF2 OF2	1/9/09 7:10	1/5/09 14:22	150.30	
OF2 OF2	1/30/09 7:16	2/12/09 0:00	304.57	
OF2 OF2	2/12/09 0:00	2/19/09 13:56	181.93	
OF2 OF2	2/20/09 14:17	3/23/09 9:17	739.00	
OF2	3/28/09 9:33	3/29/09 11:20	25,78	
OF2	3/29/09 11:20	3/30/09 13:42	26.37	

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		Allac	innent to kest	DOUGE TO KO MG-T
Unit	Event	Event	Event	
Name	<u>Start</u>	<u>End</u>	<u>Hours</u>	
050	4/0/00 40 04	**********		
OF2	4/6/09 13:24	4/13/09 13:14	167.83	
OF2 OF2	4/13/09 13:14	4/17/09 12:37	95.38	
	4/25/09 12:09	4/26/09 12:53	24.73	
OF2	5/5/09 13:16	5/6/09 6:00	16.73	
OF2	5/6/09 6:00	5/16/09 9:37	243.62	
OF2	5/30/09 6:07	5/31/09 13:07	31.00	
OF2	6/7/09 18:44	6/8/09 8:55	14.18	
OF2 OF2	6/15/09 9:22 6/20/09 12:28	6/17/09 7:45	46.38	
OF2	6/21/09 6:25	6/21/09 6:25 7/2/09 7:18	17.95	
OF2	7/2/09 7:18	7/6/09 8:16	264.88	
OF2	7/9/09 14:16	7/25/09 7:11	96.97 376.92	
OF2	7/25/09 16:45	7/26/09 10:35	17.83	
OF2	7/31/09 12:11	8/7/09 11:51	167.67	
OF2	8/10/09 11:59	8/13/09 10:40	70.68	
OF2	8/13/09 10:42	9/1/09 8:30	453.80	
OF2	9/1/09 8:30	9/28/09 8:58	648.47	
OF2	10/9/09 8:45	10/12/09 12:57	76.20	
OF2	10/13/09 3:11	10/15/09 7:03	70.20 51.87	
OF2	10/24/09 11:46	10/30/09 13:45	145.98	
012	10/24/03 11:40	10/30/09 13,43	143.50	
OF3	8/18/08 12:25	11/18/08 14:59	2,210.57	
OF3	11/21/08 15:28	11/26/08 17:08	121.67	
OF3	12/1/08 7:53	12/1/08 8:04	0.18	
OF3	12/2/08 18:45	12/4/08 12:51	42.10	
OF3	12/10/08 12:15	12/11/08 8:32	20.28	
OF3	12/14/08 13:16	12/17/08 13:46	72.50	
OF3	12/22/08 9:35	12/26/08 0:00	86.42	
OF3	12/26/08 0:00	12/31/08 12:00	132.00	
OF3	12/31/08 12:00	1/1/09 0:00	12.00	
OF3	1/1/09 0:00	1/5/09 14:03	110.05	
OF3	1/9/09 9:37	1/15/09 10:57	145.33	
OF3	1/30/09 7:32	2/12/09 0:00	304,47	
OF3	2/12/09 0:00	2/19/09 14:15	182.25	
OF3	2/19/09 14:15	2/20/09 11:33	21.30	
OF3	3/28/09 6:34	3/29/09 11:20	28.77	
OF3	3/29/09 11:20	3/30/09 12:47	25.45	
OF3	4/6/09 13:29	4/9/09 10:45	69.27	
OF3	4/13/09 6:12	4/17/09 10:08	99.93	
OF3	4/25/09 12:14	4/26/09 13:08	24.90	
OF3	5/6/09 5:43	5/16/09 9:37	243.90	
OF3	5/16/09 9:37	5/20/09 12:55	99.30	
OF3	5/30/09 6:11	5/31/09 10:04	27.88	
OF3	6/15/09 9:33	6/16/09 12:09	26.60	
OF3	6/21/09 6:27	7/2/09 7:18	264.85	
OF3	7/2/09 7:18	7/6/09 7:27	96.15	
OF3	7/9/09 12:16	7/25/09 6:53	378.62	
OF3	7/25/09 16:48	7/26/09 10:11	17.38	
OF3	7/31/09 12:28	8/4/09 7:16	90.80	
OF3	8/4/09 19:13	8/6/09 14:02	42.82	
OF3	8/17/09 7:24	8/19/09 12:00	52.60	
OF3	8/19/09 12:00	8/20/09 13:13	25.22	
OF3	8/20/09 13:18	8/21/09 7:39	18.35	
OF3	8/21/09 7:42	9/1/09 9:30	265.80	
OF3	9/1/09 9:30	9/8/09 7:23	165.88	
OF3	9/18/09 8:32	9/21/09 9:45	73.22	

Unit	Event	Event	Event	Page 11 of 19
Name	Start	End	Hours	Conroy / Seelye
		<u></u>	110010	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
OF3	9/21/09 18:55	9/25/09 6:50	83.92	
OF3	10/6/09 4:15	10/9/09 6:42	74.45	
OF3	10/10/09 11:52	10/15/09 9:01	117.15	
OF3	10/27/09 7:30	10/28/09 13:18	29.80	
OF4	11/6/08 10:50	11/7/08 11:48	24.97	
OF4	11/8/08 8:06	11/14/08 14:13	150.12	
OF4	11/15/08 16:07	11/16/08 10:47	18.67	
OF4	11/17/08 6:12	11/18/08 8:53	26.68	
OF4	11/20/08 13:39	11/20/08 15:13	1.57	
OF4	11/21/08 16:52	11/26/08 8:20	111.47	
OF4	12/1/08 7:28	12/1/08 7:44	0.27	
OF4	12/2/08 16:20	12/3/08 12:45	20,42	
OF4	12/6/08 6:02	12/8/08 9:17	51.25	
OF4	12/9/08 6:49	12/9/08 11:30	4.68	
OF4	12/10/08 12:55	12/11/08 8:24	19.48	
OF4	12/18/08 10:05	12/18/08 13:46	3.68	
OF4	12/25/08 10:15	12/26/08 0:00	13.75	
OF4	12/26/08 0:00	12/31/08 12:00	132.00	
OF4	12/31/08 12:00	1/1/09 0:00	12.00	
OF4 OF4	1/1/09 0:00 1/9/09 13:13	1/2/09 14:12 1/15/09 10:28	38.20	
OF4	1/30/09 12:39	2/2/09 13:30	141.25 72.85	
OF4	2/2/09 13:30	2/3/09 13:09	23.65	
OF4	2/11/09 8:09	2/12/09 0:00	15.85	
OF4	2/12/09 0:00	2/19/09 10:20	178.33	
OF4	3/29/09 11:21	3/30/09 12:32	25.18	
OF4	4/6/09 13:35	4/9/09 7:44	66.15	
OF4	4/13/09 7:07	4/16/09 12:07	77.00	
OF4	4/16/09 13:11	4/17/09 9:25	20.23	
OF4	4/26/09 9:07	4/26/09 13:27	4.33	
OF4	5/6/09 8:43	5/16/09 7:52	239.15	
OF4	5/30/09 6:14	5/31/09 12:00	29.77	
OF4	5/31/09 12:00	6/4/09 18:39	102.65	
OF4	6/15/09 10:33	6/16/09 9:07	22.57	
OF4	6/21/09 6:34	7/1/09 16:22	249.80	
OF4	7/9/09 17:34	7/13/09 7:22	85.80	
OF4	7/13/09 19:19	7/14/09 10:08	14.82	
OF4	7/17/09 12:09	7/22/09 8:56	116.78	
OF4	7/31/09 12:23	8/4/09 6:55	90.53	
OF4	8/4/09 19:14	8/6/09 13:36	42.37	
OF4	8/17/09 8:00	8/19/09 7:30	47.50	
OF4	8/19/09 7:30	8/19/09 11:59	4.48	
OF4	8/22/09 4:48	8/23/09 10:57	30.15	
OF4 OF4	8/27/09 20:34	8/31/09 10:25	85.85	
OF4	9/1/09 14:02 9/25/09 23:14	9/25/09 7:10 9/28/09 6:43	569.13 55.48	
OF4	10/5/09 21:06			
OF4	10/10/09 11:54	10/9/09 8:38 10/12/09 12:39	83.53 48.75	
OF4	10/13/09 8:46	10/12/09 12:39	49.28	
OF4	10/27/09 7:35	11/4/09 13:23	197.80	
OF5	7/13/08 11:00	1/1/09 0:00	4,117.00	
OF6	11/8/08 23:07	11/9/08 10:39	11.53	
OES	11/18/08 10:34		150.72	

OF6

11/18/08 10:34 11/24/08 17:17

150.72

Attachment to Response to KU AG-1 Question No. 225

		Allac	illiletit to kesj	polise to NO AG-1 Question No. 225
Unit	Event	Event	Event	Page 12 of 19
<u>Name</u>	Start	End	Hours	Conroy / Seelye
OEE	12/10/08 12:00	40/44/00 44:04	22.02	
OF6	12/10/08 13:00	12/11/08 11:01	22.02	
OF6	12/18/08 10:00	12/18/08 13:24	3.40	
OF6	12/25/08 22:06	12/31/08 11:55	133.82	
OF6	1/9/09 14:21	1/14/09 15:45	121.40	
OF6	1/14/09 16:16	1/20/09 13:14	140.97	
OF6	1/21/09 1:24	1/21/09 9:16	7.87	
OF6	1/30/09 14:49	2/2/09 14:32	71.72	
OF6	2/11/09 13:20	2/12/09 0:00	10.67	
OF6	2/12/09 0:00	2/18/09 13:50	157.83	
OF6	3/23/09 9:45	3/23/09 10:28	0.72	
OF6	3/30/09 6:49	3/30/09 10:34	3.75	
OF6	4/2/09 21:18	4/3/09 9:44	12.43	
OF6	4/13/09 7:10	4/16/09 8:48	73.63	
OF6	4/28/09 22:17	4/29/09 12:25	14.13	
OF6	5/6/09 8:47	5/18/09 7:16	286.48	
OF6	5/18/09 13:07	5/18/09 13:44	0.62	
OF6	5/30/09 7:18	5/31/09 7:36	24.30	
OF6	6/1/09 10:05	6/1/09 12:39	2.57	
OF6	6/15/09 10:36	6/16/09 7:15	20.65	
OF6	6/20/09 6:31	7/29/09 15:37	945.10	
OF6	7/29/09 15:39	7/30/09 10:00	18.35	
OF6	7/30/09 10:48	7/30/09 12:23	1.58	
OF6	7/30/09 12:33	7/30/09 12:49	0.27	
OF6	7/30/09 13:56	7/31/09 7:39	17.72	
OF6	7/31/09 9:20	7/31/09 9:41	0.35	
OF6	8/1/09 7:01	8/3/09 11:52	52.85	
OF6	8/4/09 23:53	8/6/09 12:49	36.93	
OF6	8/17/09 7:56	8/17/09 13:22	5.43	
OF6	8/23/09 3:50	8/24/09 9:17	29.45	
OF6	8/28/09 8:28	8/31/09 9:42	73.23	
OF6	9/5/09 12:00	9/8/09 9:15	69.25	
OF6	9/18/09 12:32	9/21/09 9:25	68.88	
OF6	10/10/09 11:31	10/12/09 14:00	50.48	
OF6	10/12/09 14:00	10/14/09 11:00	45.00	
OF6	10/14/09 11:00	10/16/09 10:48	47.80	
OF6	10/27/09 7:51	10/27/09 13:27	5.60	
OF7	1/1/08 0:00	1/31/08 14:07	734.12	
OF7	11/5/08 10:03	11/5/08 10:57	0.90	
OF7	11/6/08 16:42	11/7/08 7:54	15.20	
OF7	11/12/08 11:37	11/14/08 11:09	47.53	
OF7	12/3/08 13:35	12/3/08 14:04	0.48	
OF7	12/9/08 12:57	12/9/08 14:30	1.55	
OF7	12/11/08 11:10	12/11/08 11:37	0.45	
OF7	12/17/08 21:57	12/18/08 7:00	9.05	
OF7	12/18/08 7:00	12/24/08 10:52	147.87	
OF7	12/25/08 21:54	12/31/08 11:37	133.72	
OF7	1/9/09 14:19	1/14/09 15:30	121.18	
OF7	1/14/09 15:30	1/16/09 13:05	45.58	
OF7	1/30/09 14:46	2/2/09 10:52	68.10	
OF7	2/6/09 0:30	2/6/09 8:50	8.33	
OF7	2/11/09 13:15	2/12/09 0:00	10.75	
OF7	2/12/09 0:00	2/18/09 14:21	158.35	
OF7	2/20/09 9:50	2/20/09 10:51	1.02	
OF7	3/19/09 11:14	3/19/09 12:07	0.88	
0.7	2/20/00 (1:17	2/20/00 12:51	4.00	

OF7

3/30/09 6:47

3/30/09 10:52

4.08

		Attac	nment to Res	ponse to KU AG-1 Question No. 225
Unit	Event	Event	Event	Page 13 of 19
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	Conroy / Seelye
OF7	4/6/09 11:42	4/6/09 13:18	1.60	
OF7	4/13/09 13:12	4/16/09 8:55	67.72	
OF7	4/22/09 9:25	4/24/09 12:55	51.50	
OF7	5/1/09 8:39	5/1/09 9:39	1.00	
OF7	5/2/09 8:53	5/2/09 14:30	5.62	
OF7	5/2/09 14:30	5/4/09 7:33	41.05	
OF7	5/6/09 12:10	5/16/09 10:56	238.77	
OF7	5/22/09 12:16	5/22/09 14:04	1.80	
OF7	5/22/09 14:05	5/22/09 14:26	0.35	
OF7	5/30/09 7:22	5/31/09 7:18	23.93	
OF7	6/1/09 9:24	6/1/09 12:58	3.57	
OF7	6/15/09 10:38	6/16/09 6:45	20.12	
OF7	6/16/09 23:28	6/17/09 7:30	8.03	
OF7	6/21/09 11:26	7/2/09 7:18	259.87	
OF7	7/9/09 0:36	7/9/09 12:12	11.60	
OF7	7/13/09 14:55	7/14/09 9:16	18.35	
OF7	7/17/09 16:56	7/20/09 6:53	61.95	
OF7	7/21/09 23:34	7/22/09 9:00	9.43	
OF7	7/22/09 9:00	7/22/09 10:35	1.58	
OF7	7/26/09 9:31	7/26/09 9:45	0.23	
OF7	7/31/09 14:34	8/3/09 12:35	70.02	
OF7	8/4/09 23:13	8/6/09 7:14	32.02	
OF7	8/17/09 7:50	8/17/09 12:45	4.92	
OF7	8/28/09 12:33	8/31/09 6:58	66.42	
OF7	9/18/09 10:00	9/21/09 8:22	70.37	
OF7	10/10/09 11:34	10/12/09 8:00	44.43	
OF7	10/12/09 8:00	11/12/09 16:46	752.77	
050	0/0/00 44 44	4444000 44 45	0.440.00	
OF8	8/8/08 11:44	11/18/08 11:45	2,448.02	
OF8	12/25/08 18:51	12/31/08 12:00	137.15	
OF8	12/31/08 12:00	1/1/09 0:00	12.00	
OF8	1/1/09 0:00	1/2/09 11:28	35.47	
OF8	1/9/09 14:16	1/14/09 15:30	121.23	
OF8	1/14/09 15:30	1/15/09 11:25	19.92	
OF8	1/30/09 12:47	2/2/09 10:23	69.60	
OF8	2/11/09 13:11	2/12/09 0:00	10.82	
OF8	2/12/09 0:00	2/19/09 11:00	179.00	
OF8	2/25/09 17:22	2/27/09 10:00	40.63	
OF8	3/30/09 6:39	3/30/09 11:11	4.53	
OF8	4/13/09 13:14	4/16/09 10:20	69.10	
OF8	5/6/09 12:14	5/16/09 7:19	235.08	
OF8	5/30/09 7:25	5/31/09 7:02	23.62	
OF8	6/1/09 8:47	6/1/09 13:27	4.67	
OF8	6/15/09 10:40	6/16/09 7:35	20.92	
OF8	6/21/09 11:28	7/2/09 7:18	259.83	
OF8	7/2/09 7:18	7/6/09 12:34	101.27	
OF8	7/8/09 22:18	7/10/09 9:42	35.40	
OF8	7/11/09 20:12	7/22/09 11:15	255.05	
OF8	8/1/09 7:08	8/3/09 12:18	53.17	
OF8	8/4/09 19:16	8/6/09 8:36	37.33	
OF8	8/17/09 7:37	8/17/09 12:29	4.87	
OF8	8/28/09 6:43	8/31/09 9:00	74.28	
OF8	9/1/09 13:07	9/21/09 7:07	474.00	
OF8	10/10/09 11:46	10/12/09 12:03	48.28	
OF8	10/14/09 6:49	10/14/09 12:16	5.45	
OF8	10/26/09 7:33	10/26/09 12:15	4.70	

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Unit <u>Name</u>	Event <u>Start</u>	Event <u>End</u>	Event <u>Hours</u>
OF8	10/27/09 7:55	10/27/09 13:49	5.90
PR11	2/4/09 6:25	2/4/09 12:07	570
PR11	5/15/09 9:58	5/15/09 11:05	1.12
PR11	6/1/09 9:00	6/2/09 10:00	25.00
PR11	9/8/09 8:21	9/8/09 13:06	4.75
PR11	9/14/09 16:16	9/15/09 10:00	17.73
PR12	2/4/09 6:25	2/6/09 9:00	50.58
PR12	5/12/09 8:00	5/12/09 9:33	1.55
PR12 PR12	5/14/09 7:36 7/27/09 8:32	5/14/09 14:14 7/27/09 18:10	6.63 9.63
PR12	9/14/09 16:16	9/15/09 12:59	20.72
PR13	10/31/08 7:00	10/31/08 14:10	7.17
PR13	12/13/08 7:40	12/13/08 9:55	2.25
PR13	1/28/09 3:22	1/28/09 8:50	5.47
PR13	3/24/09 12:30	3/24/09 14:00	1.50
PR13	6/24/09 1:00	6/26/09 19:30	66.50
PR13	6/30/09 6:21	6/30/09 12:30	6.15
PR13	7/1/09 8:15	7/1/09 8:40	0.42
PR13	7/6/09 7:20	7/6/09 11:50	4.50
PR13	7/15/09 9:00	7/15/09 12:00	3.00
PR13	7/16/09 6:35	7/16/09 7:30	0.92
PR13	8/4/09 8:42	8/5/09 12:30	27.80
PR13	9/17/09 7:16 9/21/09 14:23	9/17/09 13:53 9/25/09 9:54	6.62 91.52
PR13 PR13	10/20/09 12:27	10/20/09 12:36	0.15
TC1	12/5/08 22:07	12/6/08 8:20	10.22
TC1	12/6/08 10:12	12/6/08 14:38	4.43
TC1	12/12/08 23:34	12/14/08 23:19	47.75
TC1	12/14/08 23:19	12/15/08 12:05	12.77
TC1	1/7/09 1:43	1/7/09 3:04	1.35
TC1	2/8/09 10:38	2/8/09 15:47	5.15
TC1	2/9/09 13:58	2/10/09 12:30	22,53
TC1	2/10/09 12:30	2/12/09 3:48	39.30
TC1	2/12/09 5:17	2/12/09 5:45	0.47
TC1	2/28/09 20:34	3/6/09 17:17	140.72
TC1	3/6/09 18:16	3/6/09 18:55	0.65
TC1	3/6/09 19:05	3/6/09 20:32	1.45
TC1	3/27/09 23:25 3/28/09 22:23	3/28/09 22:23 3/29/09 6:21	22.97 7.97
TC1 TC1	4/24/09 23:27	4/25/09 22:29	23.03
TC1	4/30/09 23:16	5/2/09 22:09	46.88
TC1	5/2/09 22:17	5/2/09 22:53	0.60
TC1	5/3/09 1:31	5/3/09 2:10	0.65
TC1	5/3/09 3:00	5/3/09 4:04	1.07
TC1	5/29/09 23:19	5/31/09 9:31	34.20
TC1	6/3/09 1:03	6/3/09 16:23	15.33
TC1	6/9/09 3:28	6/9/09 4:03	0.58
TC1	7/11/09 0:42	7/13/09 0:00	47.30
TC1	7/13/09 0:00	7/13/09 9:23	9.38
TC1	8/11/09 19:02	8/12/09 20:47	25.75
TC1	8/12/09 20:47	8/13/09 3:22	6.58
TC1	8/13/09 3:22	8/13/09 20:34	17.20

Attachment to Response to KU AG-1 Question No. 225

Unit	Event	Event	Event
<u>Name</u>	Start	End	Hours
TC1	8/17/09 14:52	8/17/09 15:23	0.52
TC1	8/26/09 12:36	8/28/09 2:00	37.40
TC1	9/8/09 7:12	9/9/09 6:54	23.70
TC1	9/25/09 21:55	9/25/09 22:25	0.50
TC5	2/19/09 9:00	2/19/09 13:36	4.60
TC5	4/27/09 10:54	4/27/09 11:26	0.53
TC5	5/22/09 3:15	5/22/09 16:28	13.22
TC5	6/5/09 8:30	6/5/09 13:30	5.00
TC5	8/5/09 7:00	8/5/09 14:00	7.00
TC5	8/22/09 2:30	8/22/09 16:52	14.37
TC5	10/6/09 3:30	10/6/09 15:00	11.50
TOC	4014100 = 00	40/5/00 40 55	00.00
TC6	12/4/08 7:00	12/5/08 13:05	30.08
TC6	12/16/08 9:16	12/16/08 10:17	1.02
TC6	12/16/08 17:54	12/16/08 21:18	3.40
TC6	12/19/08 7:11	12/19/08 8:08	0.95
TC6	12/22/08 7:20	12/22/08 7:43	0.38
TC6	12/30/08 7:15	12/30/08 8:57	1.70
TC6	1/9/09 4:00	1/10/09 2:25	22.42
TC6	1/14/09 7:30	1/14/09 16:00	8.50
TC6	2/17/09 5:57	2/17/09 6:27	0.50
TC6	2/19/09 8:15	2/19/09 13:36	5.35
TC6	2/26/09 4:00	2/26/09 16:21	12.35
TC6	4/6/09 21:53	4/6/09 23:55	2.03
TC6	4/9/09 2:00	4/24/09 18:54	376.90
TC6	4/24/09 19:01	4/25/09 9:00	13.98
TC6	4/27/09 10:47	4/28/09 7:31	20.73
TC6	5/22/09 3:15	5/22/09 16:28	13.22
TC6	5/28/09 6:15	5/28/09 15:11	8.93
TC6	7/10/09 13:14	7/10/09 16:39	3.42
TC6	8/5/09 7:00	8/5/09 14:00	7.00
TC6	8/22/09 2:30	8/22/09 16:52	14.37
TC7	12/22/08 12:10	12/22/08 21:10	9.00
TC7	5/22/09 3:15	5/22/09 16:28	13.22
TC7	7/2/09 6:20	7/2/09 13:40	7.33
TC7	8/6/09 7:00	8/6/09 14:00	7.00
TC7	8/10/09 12:45	8/10/09 14:07	1.37
TC7	8/21/09 7:00	8/21/09 10:30	3.50
TC7	8/21/09 10:30	8/22/09 16:52	30.37
TC7	8/31/09 6:38	8/31/09 12:20	5.70
TC7	9/6/09 6:56	9/6/09 10:05	3.15
•			
TC8	12/22/08 7:20	12/22/08 21:10	13.83
TC8	3/2/09 6:15	3/2/09 7:40	1.42
TC8	4/27/09 10:54	4/27/09 11:26	0.53
TC8	5/29/09 4:00	5/29/09 19:50	15.83
TC8	7/27/09 6:30	7/27/09 15:34	9.07
TC8	8/6/09 7:00	8/6/09 14:00	7.00
TC8	10/19/09 5:43	10/19/09 6:17	0.57
TC8	10/19/09 5:43	10/19/09 6:17	0.57
100	10/13/03 0:1/	10119109 0.03	0.03
TCO	10/00/00 E-00	10/00/00 10:50	Ego
TC9	12/22/08 5:30	12/22/08 10:53	5.38
TC9	3/12/09 7:30	3/12/09 15:40	8.17
TC9	4/2/09 7:00	4/2/09 12:20	5.33

Attachment to Response to KU AG-1 Question No. 225

Unit	Event	Event	Event	Page 16 of 19
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	Conroy / Seelye
TC9	5/27/09 6:20	5/27/09 9:30	3.17	
TC9	5/29/09 4:00	5/29/09 18:11	14.18	
TC10	12/5/08 23:08	12/6/08 7:30	8.37	
TC10	12/22/08 5:30	12/22/08 10:53	5.38	
TC10	2/5/09 0:55	2/5/09 8:30	7.58	
TC10	2/16/09 7:30	2/16/09 16:02	8.53	
TC10	2/23/09 15:20	2/23/09 19:34	4.23	
TC10	5/5/09 1:30	5/5/09 13:19	11.82	
TC10	5/15/09 13:04	5/18/09 12:41	71.62	
TC10	5/29/09 4:00	5/29/09 18:11	14.18	
TC10	6/26/09 11:29	6/26/09 13:35	2.10	
TC10	7/17/09 6:15	7/17/09 14:00	7.75	
TC10	7/30/09 12:20	7/30/09 12:46	0.43	
TC10	10/28/09 14:30	10/29/09 13:45	23.25	
TY3	12/14/08 6:15	12/14/08 12:20	6.08	
TY3	12/15/08 3:56	12/15/08 7:05	3.15	
TY3	12/19/08 11:49	12/21/08 9:07	45.30	
TY3	12/22/08 22:07	12/24/08 12:30	38.38	
TY3	1/29/09 4:40	1/29/09 23:25	18.75	
TY3	1/30/09 14:46	2/1/09 14:45	47.98	
TY3	2/3/09 9:20	2/13/09 0:57	231.62	
Z1	1/16/09 6:51	6/1/09 2:00	3,259.15	

Unit log for Dix Hydro
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Start	Stop	Lake Level	
date	Time	Stop	Duration
10/27/2009	09:07	732.89	10:19:00
10/27/2009	19:35	732.81	12:06:00
10/26/2009	20:00	733.11	11:53:00
10/24/2009	16:16	734.01	9:33:00
10/23/2009	21:08	734.16	0:49:00
10/23/2009	20:11	734.16	2:18:00
10/23/2009	17:44	734.13	11:48:00
10/22/2009	16:00	734.58	10:15:00
10/21/2009	16:49	734.95	3:16:00
06/05/2009	12:13	737.01	3026:43:00
05/28/2009	12:12	741.96	5:12:00
05/27/2009	07:00	742	16:00:00
05/27/2009	15:00	741.95	1:06:00
05/15/2009	22:55	749.65	7:43:00
05/08/2009	19:08	748.1	5:21:00
05/06/2009	11:25	746.2	49:30:00
04/10/2009	07:36	737.5	19:09:00
03/26/2009	13:40	732.17	194:12:00
03/25/2009	12:46	726.1	3:57:00
03/06/2009	10:25	729.92	235:51:00
02/03/2009	13:21	744.16	2:32:00
01/28/2009	10:49	743.99	134:00:00
01/28/2009	20:34	734.84	4:42:00
01/20/2009	13:30	723.74	3:00:00
01/19/2009	14:20	723.59	3:20:00
01/09/2009	14:02	728.61	0:30:00

Unit log for Dix Hydro 02

Start date	Stop Time	Lake Level Stop	Duration
10/27/2009	18:43	732.85	11:17:00
10/26/2009	20:01	733.1	11:49:00
10/24/2009	16:03	734.01	9:21:00
10/23/2009	16:35	734.16	10:43:00
10/22/2009	15:36	734.58	9:45:00
10/21/2009	16:07	735.03	2:19:00
10/09/2009	11:57	736.94	2:12:00
09/29/2009	10:14	740.16	0:06:00
09/26/2009	12:45	737.35	0:33:00
08/31/2009	06:38	739.11	14:51:00
08/16/2009	11:46	741.44	24:21:00
07/28/2009	09:54	739.04	0:57:00
07/17/2009	08:43	739.71	1:33:00
07/15/2009	07:40	739.9	1:00:00
07/10/2009	09:00	740.65	1:43:00
06/26/2009	06:41	743.09	0:33:00
06/26/2009	06:08	743.16	1:59:00
06/25/2009	13:55	743.5	3:31:00
06/22/2009	13:57	744.3	4:13:00
06/18/2009	14:50	741.75	4:45:00
06/16/2009	21:36	743.28	5:19:00
06/15/2009	06:04		14:15:00
06/10/2009	05:38	742.67	42:04:00
06/10/2009	11:34	740.65	0:14:00
06/10/2009	11:20	740.61	1:06:00
05/28/2009	12:28	742	5:28:00
05/27/2009	07:00	742	16:00:00
05/27/2009	15:00	741.95	1:09:00
05/15/2009	22:55	749.65	7:02:00
05/08/2009	19:06	748.1	5:21:00
05/06/2009	11:26	746.24	49:31:00
04/10/2009	07:40	737.5	19:13:00
03/25/2009	12:54	726.1	4:07:00
03/24/2009	14:47	726.51	7:52:00
03/10/2009	10:25	729.89	148:55:00
01/30/2009	05:30	727.86	929:32:00
01/28/2009	13:40	741.47	16:53:00
01/28/2009	20:21	734.84	4:30:00
01/27/2009	13:55	723.74	0:35:00
01/20/2009	13:30	723.74	3:00:00

Attachment to Response to KU AG-1 Question No. 225

Unit log for Dix Hydro 03		Dix Hydro 03		Page 19 of 19		
	•	•			Conroy / Seelye	
	Start date	Stop Time	Lake Level Stop	Duration		
	03/05/2009	00:00	727.31	7235:36:00		
	02/02/2009	15:12	744.06	20:07:00		
	01/28/2009	13:45	741.31	17:00:00		
	01/28/2009	20:14	734.84	4:23:00		
	01/27/2009	08:45	727.49	19:42:00		
	01/20/2009	13:19	723.8	146:49:00		

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 226

Responding Witnesses: Robert M. Conroy/William Steven Seelye

- Q-226. Please identify and explain any events or circumstance occurring during the test year that materially (significantly) altered the normal (typical) economic dispatch of LG&E's and KU's electric Production resources (if any).
- A-226. Besides the forced and maintenance outages identified in the response to Question No. 225, along with planned outages, the Company is unaware of any events or circumstances occurring during the test year that materially altered the economic dispatch of the generation resources.

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 227

Responding Witnesses: Robert M. Conroy/William Steven Seelye

- Q-227. For each KU and LG&E generating unit, please provide average annual fuel cost per KWH during test year.
- A-227. See attached.

# Kentucky Utilities Company Case No. 2009-00548 Average Annual Fuel Cost per kWh During Test Year KU and LG&E Units

	Average Test Year Fuel		
Unit		Cost	
KU			
Steam Units	•	0.01100	
Tyrone 3	\$	0.04470	/ kwh
Green River 3	\$	0.03403	/ kwh
Green River 4	\$	0.03171	/ kwh
	•		
Brown 1	\$	0.03591	/ kwh
Brown 2	\$	0.03260	/ kwh
Brown 3	\$	0.03271	/ kwh
Ghent 1	\$	0.02587	/ kwh
Ghent 2	\$	0.03021	/ kwh
Ghent 3	\$	0.02746	/ kwh
Ghent 4	\$	0.02741	/ kwh
Combustion Turbines			
Haefling 1	\$	0.31514	/ kwh
Haefling 2	ъ \$	0.31314	
Haefling 3	\$	0.30781	/ kwh
Haening 3	Ф	0.20731	/ KWII
Brown 5	\$	0.19650	/ kwh
Brown 6	\$	0.07655	/ kwh
Brown 7	\$	0.09322	/ kwh
Brown 8	\$	0.09633	/ kwh
Brown 9	\$	0.17128	/ kwh
Brown 10	\$	0.16616	/ kwh
Brown 11	\$	0.12604	/ kwh
Paddys Run 13	\$	0.97551	/ kwh
Trimble County 5	\$	0.11193	/ kwh
Trimble County 6	\$	0.11372	/ kwh
Trimble County 7	\$	0.10787	
Trimble County 8	\$	0.15249	/ kwh
Trimble County 9	\$	0.12513	/ kwh
Trimble County 10	\$	0.13079	/ kwh

Fuel costs used in these calcuations includes coal, natural gas and oil used for generation, start-up and stabilization fuel and fuel handling costs as charged to FERC Account 501.

# Kentucky Utilities Company Case No. 2009-00548 Average Annual Fuel Cost per kWh During Test Year KU and LG&E Units

Unit	Average Test Year Fuel Cost		
LGE		Cosi	
Steam Units			
Cane Run 4	\$	0.02025	/ kwh
Cane Run 5	\$	0.02025	
Cane Run 6	\$	0.01935	
Cane Run 0	Φ	0.01770	/ KWII
Mill Creek 1	\$	0.01970	/ kwh
Mill Creek 2	\$	0.02002	/ kwh
Mill Creek 3	\$	0.01975	/ kwh
Mill Creek 4	\$	0.01937	/ kwh
Trimble County *	\$	0.02151	/ kwh
Combustion Turbines			
Cane Run CT	\$	0.30320	/ kwh
Paddy's Run 11 & 12	\$	4.95855	/ kwh
Paddy's Run 13	\$	0.97265	/ kwh
Trimble County 5	\$	0.11193	/ kwh
Trimble County 6	\$	0.11372	/ kwh
Trimble County 7	\$	0.10788	/ kwh
Trimble County 8	\$	0.15254	/ kwh
Trimble County 9	\$	0.12513	/ kwh
Trimble County 10	\$	0.13081	/ kwh
Brown 5	\$	0.12545	/ kwh
Brown 6	\$	0.07617	/ kwh
Brown 7	\$	0.09180	/ kwh
Waterside CT	\$	-	/ kwh
Zorn CT	\$	0.10287	/ kwh

<sup>\*</sup> Trimble County steam fuel costs represent 100% of fuel expense and generation

		-

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 228

- Q-228. Please specifically explain and define how KU distinguishes between primary and secondary voltage; e.g., voltage level.
- A-228. Primary and secondary voltages are shown on the proposed P.S.C Electric No. 15, Original Sheet No. 99, as provided in Tab 8, Volume I of the Statutory Notice, Application, Financial Exhibit, Table of Contents, Filing Requirements filed with the Commission on January 29, 2010.

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 229

- Q-229. Please provide a copy of the most recent KU class load study including all supporting tables, schedules, and data.
- A-229. See attached CD in the folder titled Question No. 229.

### CASE NO. 2009-00548

## Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 230

Responding Witness: William Steven Seelye

- Q-230. Please provide all workpapers, analyses, calculations, etc. supporting all KU non-jurisdictional and jurisdictional class demands (loads) utilized in the jurisdictional and class cost of service studies. In this response, please explain and indicate how class demands were specifically determined or estimated. Include all definitions of demand utilized; e.g., CP, NCP and sum of individual customers. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-230. KU's class load profiles were developed based on interval data from its load research survey. Simple and stratified random sampling techniques were utilized to develop class load profiles for the majority of the residential and commercial classes. Census samples were utilized to develop class load profiles for most of the industrial classes. After the class profiles were developed initially, they were reviewed and adjusted to ensure that (a) the annual sum of demands for a given class was consistent with the annual total of sales for the class (per the KU CIS/CCS system) and (b) the sum of class demands for a given hour equaled the KU system demand for that hour.

The requested information is included on the attached CD with these responses, in a folder titled Question No. 230.

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 231

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-231. For each KU substation dedicated to specific native load customer(s) or nonnative load customer(s), please identify each substation and the type of dedicated customer served by the substation; i.e., rate schedules, customer name, and non-jurisdictional/jurisdictional.
- A-231. See attached. None of KU's substations are dedicated to specific customers. The attached document provides the requested information for KU substations currently serving single customers.

SubID Plan Plan Description	Jurisdictional/Non-Jurisdictional
SubID Plan Plan Description 1595 568 Power Service - Secondary PF Adj	Jurisdictional
2205 563 Large Time-of-Day - Primary	Jurisdictional
2215 563 Large Time-of-Day - Primary	Jurisdictional
3102 551 Large Power Primary VA	Jurisdictional
3691 853 Company Use - Substation Totalizer	Jurisdictional
3751 110 General Services	Jurisdictional
3861 110 General Services	Jurisdictional
4121 563 Large Time-of-Day - Primary	Jurisdictional
4181 853 Company Use - Substation Totalizer	Jurisdictional
4301 550 Retail Transmission Service	Jurisdictional
4421 853 Company Use - Substation Totalizer	Jurisdictional
4431 902 Wholesale Power Sales - Primary	Non-Jurisdictional
4451 561 Power Service - Primary	Jurisdictional
4531 902 Wholesale Power Sales - Primary	Non-Jurisdictional
4751 563 Large Time-of-Day - Primary	Jurisdictional
4761 550 Retail Transmission Service	Jurisdictional
4932 853 Company Use - Substation Totalizer	Jurisdictional
5251 855 Company Use - Metered	Jurisdictional
5301 902 Wholesale Power Sales - Primary	Non-Jurisdictional
5351 563 Large Time-of-Day - Primary	Jurisdictional
5441 550 Retail Transmission Service	Jurisdictional
5471 566 Power Service - Primary PF Adj	Jurisdictional
5481 852 Company Use - Information	Jurisdictional
5501 853 Company Use - Substation Totalizer	Jurisdictional
5601 110 General Services	Jurisdictional
5831 853 Company Use - Substation Totalizer	Jurisdictional
5931 902 Wholesale Power Sales - Primary	Non-Jurisdictional
6061 853 Company Use - Substation Totalizer	Jurisdictional
6161 902 Wholesale Power Sales - Primary	Non-Jurisdictional
6192 902 Wholesale Power Sales - Primary	Non-Jurisdictional
6221 550 Retail Transmission Service	Jurisdictional
6291 853 Company Use - Substation Totalizer	Jurisdictional
6321 853 Company Use - Substation Totalizer	Jurisdictional
6581 110 General Services	Jurisdictional
6611 110 General Services	Jurisdictional
6791 110 General Services	Jurisdictional
7111 853 Company Use - Substation Totalizer	Jurisdictional
7151 853 Company Use - Substation Totalizer	Jurisdictional
7191 566 Power Service - Primary PF Adj	Jurisdictional
7331 566 Power Service - Primary PF Adj	Jurisdictional
7411 550 Retail Transmission Service	Jurisdictional
7461 110 General Services	Jurisdictional
7491 550 Retail Transmission Service	Jurisdictional
7551 902 Wholesale Power Sales - Primary	Non-Jurisdictional
7961 902 Wholesale Power Sales - Primary	Non-Jurisdictional
8161 902 Wholesale Power Sales - Primary	Non-Jurisdictional
8251 563 Large Time-of-Day - Primary	Jurisdictional
8401 566 Power Service - Primary PF Adj	Jurisdictional Jurisdictional
8771 550 Retail Transmission Service 8861 110 General Services	Jurisdictional
8861 110 General Services 8871 902 Wholesale Power Sales - Primary	Non-Jurisdictional
8891 566 Power Service - Primary PF Adj	Jurisdictional
8901 110 General Services	Jurisdictional
0301 110 Ocheral Ocivides	our isdiction tai

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 232

### Responding Witness: Shannon L. Charnas/William Steven Seelye

- Q-232. Please explain in detail and itemize individual "Property Taxes" and "Other Taxes" included in KU Seelye Exhibit 20, Pages 15 and 17.
- A-232. Property Taxes and Other Taxes include the following components:

\$ 11,424,756
\$ 160,467
6,077,338
1,820,331
69,532
\$ 8,127,668
\$ 19,552,424
\$

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 233

Responding Witness: Shannon L. Charnas/William Steven Seelye

- Q-233. Please explain where Revenues from reconnection charges, temporary services, other service revenue and refundable advances (which comprised miscellaneous service revenue in Docket No. 2008-00251) are included in KU's Class Cost of Service Study. In this response please itemize and quantify each item individually.
- A-233. The listed revenue categories are included in the line 15, Service On/Off/Ret Chk –Direct, page 20 of Seelye Exhibit 18. The balance of the revenue in Service On/Off/Ret Chk-Direct is Ret Check Chrg-Elec.

	Total Company	Kentucky Retail
RECONNECT CHRG-ELEC	897,298	878,001
TEMPORARY SERV-ELEC	21,858	21,388
OTH SERVICE REV-ELEC	440,816	431,336
FORFEITED REFUNDABLE ADVANCES	45.001	45.001

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 234

Responding Witness: Shannon L. Charnas/William Steven Seelye

- Q-234. Please explain where Revenues from AATV attachment, other rent-electric property, and rent from fiber optics (which comprised "rent from electric property" in Docket No. 2008-00251) are included in KU's Class Cost of Service Study. In this response please itemize and quantify each item individually.
- A-234. CATV attachment is on line 9, Pole Attachment direct, page 20 of Seelye Exhibit 18.

Other Rent-Electric and Rent from fiber optics are included in line 10, Facility Lease-Direct, page 20 of Seelye Exhibit 18. The balance of the revenue in Facility Lease-Direct is NRB-Electric Revenue

	Total Company	Kentucky Retail
CATV ATTACH RENT	479,643	439,828
OTH RENT-ELEC PROP	734,510	674,019
RENT FRM FIBER OPTIC	115.526	115.526

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 235

- Q-235. Please explain how interruptible (curtailment riders: CSR1, CSR2, and CSR3) customers' demands and energy usage are reflected in the KU class cost of service study.
- A-235. Curtailable customers' actual energy usages were used to develop the energy allocation factors. The customers' CP demands are adjusted to reflect levels that would have occurred had the customers not been curtailed, as applicable.

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 236

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-236. With regard to KU's current Curtailment Service Rider 1 ("CSR1"), please provide the following amounts by rate schedule, separated between Primary and Transmission, for each month of the test year:
  - (a) number of customers;
  - (b) total firm contract demand;
  - (c) total contract curtailment load;
  - (d) total billing demand;
  - (e) total demand credits;
  - (f) total non-compliance charges by month; and,
  - (g) listing of date, time, duration, and estimated MW curtailment.

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

- A-236. a-f. See attached. Also see attached CD, in folder titled Question No. 236 for the Microsoft Excel version of the attachment.
  - g. See attached.

## Attachment to Response to KU AG-1 Question No. 236 (a-f) Page 1 of 1 Conroy/Seelye

## Kentucky Utilities Company

Case No. 2009-00548

Curtailment Service Rider 1 (CSR1) - Primary For the Test Year Ending October 31, 2009

	Number of Customers	Total Firm Contract Demand (kW)	Total Contract Curtailment Load (kW)	Total Billing Demand (kW)	otal Demand Credits (\$)	Со	tal Non- mpliance arges (\$)
	(a)	(b)	(c)	(d)	(e)		(f)
Nov-08	1	200	0	2,530	\$ (7,456.32)	\$	-
Dec-08	1	200	0	2,920	\$ (8,701.96)	\$	-
Jan-09	1	200	0	2,651	\$ (7,843.20)	\$	_
Feb-09	1	200	0	2,925	\$ (13,000.24)	\$	-
Mar-09	1	200	0	2,825	\$ (13,651.56)	\$	-
Apr-09	1	200	0	2,752	\$ (13,269.36)	\$	-
May-09	1	200	0	2,323	\$ (13,269.36)	\$	-
Jun-09	1	200	0	2,223	\$ (10,521.68)	\$	-
Jul-09	1	200	0	2,369	\$ (11,277.76)	\$	*
Aug-09	1	200	0	2,344	\$ (11,150.36)	\$	-
Sep-09	1	200	0	2,344	\$ (11,097.84)	\$	~
Oct-09	1	200	0	2,362	\$ (11,240.32)	\$	-

## Attachment to Response to KU AG-1 Question No. 236 (g) Page 1 of 1 Conroy/Seelye

### Kentucky Utilities Company

Case No. 2009-00548

Curtailment Service Rider 1 (CSR1) - Primary

For the Test Year Ending October 31, 2009

Start Date	Start Time	End Date	End Time	Duration in Hours	Estimated MW Curtailment
1/15/2009	7:00:00 AM	1/15/2009	9:00:00 PM	14.0	
1/16/2009	7:00:00 AM	1/16/2009	9:00:00 PM	14.0	
6/2/2009	1:00:00 PM	6/2/2009	5:00:00 PM	4.0	
6/17/2009	1:00:00 PM	6/17/2009	5:00:00 PM	4.0	
6/23/2009	1:00:00 PM	6/23/2009	6:00:00 PM	5.0	
6/24/2009	1:00:00 PM	6/24/2009	6:00:00 PM	5.0	
6/25/2006	1:00:00 PM	6/25/2006	6:00:00 PM	5.0	
8/17/2009	10:00:00 AM	8/17/2009	6:00:00 PM	8.0	

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### Question No. 237

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-237. With regard to KU's current Curtailment Service Rider 2 ("CSR2"), please provide the following amounts by rate schedule, separated between Primary and Transmission, for each month of the test year:
  - (a) number of customers;
  - (b) total firm contract demand;
  - (c) total contract curtailment load;
  - (d) total billing demand;
  - (e) total demand credits;
  - (f) total non-compliance charges by month; and,
  - (g) listing of date, time, duration, and estimated MW curtailment.

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-237. The Company did not have any customers subject to the Curtailable Service Rider 2 within the test year.

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### **Question No. 238**

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-238. With regard to KU's current Curtailment Service Rider 3 ("CSR3"), please provide the following amounts by rate schedule, separated between Primary and Transmission, for each month of the test year:
  - (a) number of customers;
  - (b) total firm contract demand;
  - (c) total contract curtailment load;
  - (d) total billing demand;
  - (e) total demand credits;
  - (f) total non-compliance charges; and,
  - (g) listing of date, time, duration, and estimated MW curtailment.

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

- A-238. a-f. See attached. Also see attached CD, in folder titled Question No. 238 for the Microsoft Excel version of the attachment.
  - g. See attached.

### Kentucky Utilities Company

Case No. 2009-00548

Curtailment Service Rider 3 (CSR3) - Transmission For the Test Year Ending October 31, 2009

	Number of Customers	Total Firm Contract Demand (kW)	Total Contract Curtailment Load (kW)	Total Off- Peak Billing Demand <sup>1</sup>	Total Peak Billing Demand <sup>2</sup>	Total Den Credits	(\$)	Con	al Non- npliance rges (\$)
	(a)	(b)	(c)	(d)	(d)	(e)			(f)
Nov-08	1	4,000	0	140,224	71,945	\$ 422,29	5.64	\$	-
Dec-08	1	4,000	0	146,382	72,771	\$ 441,38	3.89	\$	-
Jan-09	1	4,000	0	148,676	72,355	\$ 448,49	6.53	\$	-
Feb-09	1	4,000	0	147,212	90,000	\$ 443,95	5.96	\$	-
Mar-09	1	4,000	0	166,713	90,000	\$ 504,41	0.61	\$	-
Apr-09	1	4,000	0	167,281	90,000	\$ 506,17	1.72	\$	-
May-09	1	4,000	0	170,719	90,000	\$ 516,82	9.83	\$	-
Jun-09	1	4,000	0	148,685	90,000	\$ 448,52	3.81	\$	-
Jul-09	1	4,000	0	150,149	90,000	\$ 453,06	0.97	\$	-
Aug-09	1	4,000	0	150,517	90,000	\$ 454,20	4.10	\$	-
Sep-09	1	4,000	0	149,285	90,000	\$ 450,38	2.38	\$	-
Oct-09	1	4,000	0	145,599	90,000	\$ 438,95	6.06	\$	-

<sup>&</sup>lt;sup>1</sup> Off-Peak Billing Demand is in kW for the months of November and December 2008, and January 2009. The rest of the months billind demand is in kVa

<sup>&</sup>lt;sup>2</sup> Peak Billing Demand is in kW for the months of November and December 2008, and January 2009. The rest of the months billind demand is in kVa

## Kentucky Utilities Company

Case No. 2009-00548

### Curtailment Service Rider 3 (CSR3) - Transmission For the Test Year Ending October 31, 2009

Start Date	Start Time	End Date	End Time	Duration in Hours	Estimated MW Curtailment
11/19/2008	5:30:00 PM	11/19/2008	9:30:00 PM	4.00	
1/7/2009	5:42:00 PM	1/7/2009	7:00:00 PM	1.30	
1/8/2009	8:10:00 AM	1/8/2009	9:50:00 AM	1.67	
1/9/2009	8:00:00 AM	1/9/2009	9:00:00 AM	1.00	
1/12/2009	8:00:00 AM	1/12/2009	8:36:00 AM	0.60	
1/13/2009	5:40:00 PM	1/13/2009	7:05:00 PM	1.42	
1/15/2009	11:59:00 AM	1/15/2009	2:30:00 PM	2.52	
1/22/2009	8:10:00 AM	1/22/2009	9:45:00 AM	1.58	
1/23/2009	6:00:00 PM	1/23/2009	7:15:00 PM	1.25	
2/4/2009	6:00:00 PM	2/4/2009	10:00:00 PM	4.00	
2/16/2009	6:50:00 PM	2/16/2009	7:50:00 PM	1.00	
2/17/2009	8:00:00 AM	2/17/2009	10:09:00 AM	2.15	
3/2/2009	8:00:00 AM	3/2/2009	1:50:00 PM	5.83	
3/2/2009	5:30:00 PM	3/2/2009	8:30:00 PM	3.00	
3/3/2009	8:00:00 AM	3/3/2009	1:00:00 PM	5.00	
3/11/2009	8:25:00 PM	3/11/2009	9:35:00 PM	1.17	
3/12/2009	5:10:00 PM	3/12/2009	8:15:00 PM	3.08	
5/19/2009	4:41:00 PM	5/19/2009	5:11:00 PM	0.50	
6/2/2009	1:20:00 PM	6/2/2009	3:02:00 PM	1.70	
6/9/2009	1:40:00 PM	6/9/2009	7:20:00 PM	5.67	
6/12/2009	2:15:00 PM	6/12/2009	4:57:00 PM	2.70	
6/15/2009	12:00:00 PM	6/15/2009	5:52:00 PM	5.87	
6/16/2009	12:23:00 PM	6/16/2009	2:30:00 PM	1.92	
6/30/2009	3:15:00 PM	6/30/2009	6:00:00 PM	2.75	
6/30/2009	7:00:00 PM	6/30/2009	7:45:00 PM	0.75	
7/8/2009	11:41:00 AM	7/8/2009	2:00:00 PM	2.32	
7/10/2009	3:30:00 PM	7/10/2009	6:35:00 PM	3.08	
7/16/2009	3:50:00 PM	7/16/2009	6:30:00 PM	2.67	
7/20/2009	6:15:00 PM	7/20/2009	7:45:00 PM	1.50	
7/23/2009	3:00:00 PM	7/23/2009	6:00:00 PM	3.00	
7/24/2009	2:00:00 PM	7/24/2009	3:30:00 PM	1.50	
8/5/2009	4:58:00 PM	8/5/2009	6:35:00 PM	1.62	
8/7/2009	1:35:00 PM	8/7/2009	3:00:00 PM	1.42	
8/10/2009	12:42:00 PM	8/10/2009	2:20:00 PM	1.63	
8/11/2009	12:24:00 PM	8/11/2009	3:45:00 PM		
8/11/2009	6:30:00 PM	8/11/2009	9:00:00 PM		
8/12/2009	2:02:00 PM	8/12/2009	7:35:00 PM		
8/13/2009	1:55:00 PM	8/13/2009	7:30:00 PM		
8/17/2009	3:20:00 PM	8/17/2009	4:00:00 PM		
8/18/2009	1:00:00 PM	8/18/2009	3:00:00 PM		
9/14/2009	3:10:00 PM	9/14/2009	5:30:00 PM		



### CASE NO. 2009-00548

## Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 239

- Q-239. With regard to KU's proposed Curtailable Service Rider ("CSR") referenced at Pages 20-23 of Mr. Seelye's direct testimony, please provide all workpapers, spreadsheets, source documents, assumptions, etc. utilized to develop the CSR provisions (curtailable hours, buy-through rates, etc.) being proposed in this case. Please provide the response in hard copy as well as in Microsoft readable electronic format as applicable (preferably Microsoft Excel).
- A-239. There are no workpapers used to develop the CSR provisions.

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### **Question No. 240**

- Q-240 With regards to the Specific Assignment of Curtailable Service Rider credits and avoided costs shown in KU Seelye Exhibit 20, Page 23 and 24:
  - (a) please explain what the <\$7,430,743> of "Curtailable Service Rider Avoided Cost" represents and provide all workpapers showing the determination of this amount;
  - (b) please explain and provide all workpapers, spreadsheets, source documents, and analyses showing how the "specific assignments" were made to individual classes; and,
  - (c) please explain the basis and provide all workpapers and spreadsheets showing how the Allocation of Curtailable Service Rider Credits were made; e.g., the development of Allocation Vector "INTCRE."
- A-240. (a) The <\$7,430,743> of "Specific Assignment of Interruptible Credit" represents the interruptible credits provided to CSR customers during the test year. See page 2 of Seelye Exhibit 6.
  - (b) The amount is assigned to the rate class under which the customer is served. See page 1 of Seelye Exhibit 6.
  - (c) The "INTCRE" allocation factor represents the sum of the winter and summer fixed production plant. The calculation is shown in the cost of service study provided in response to KPSC-2 Question No. 125.

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

### **Question No. 241**

### Responding Witness: Chris Hermann

- Q-241. Please provide a list of KU distribution overhead conductor types and sizes currently being installed (typical), separated by primary system and secondary system.
- A-241. Standard distribution conductors for new Primary and Secondary construction are:

### Primary System - Bare Conductor

795 kcmil All Aluminum Conductor 795 kcmil Aluminum Core Steel Reinforced 397 kcmil Aluminum Core Steel Reinforced 266 kcmil Aluminum Core Steel Reinforced 2/0 AWG Aluminum Core Steel Reinforced #2 AWG Aluminum Core Steel Reinforced

### Primary System – Covered Conductor

795 kcmil All Aluminum Aerial Cable 397 kcmil All Aluminum Aerial Cable 2/0 AWG All Aluminum Aerial Cable

### Secondary/Service Conductors – Insulated

#2 AWG 1/C Aluminum Core Steel Reinforced #2/0 AWG 1/C Aluminum Core Steel Reinforced #4 All Aluminum 2/C Duplex #2 AWG All Aluminum 3/C Triplex 2/0 AWG All Aluminum 3/C Triplex and 4/C Quadruplex 397 kcmil All Aluminum 3/C Triplex and 4/C Quadruplex

### CASE NO. 2009-00548

### Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 242

Responding Witness: Chris Hermann

- Q-242. Please provide the total installed KU primary voltage Overhead conductors footage.
- A-242. As of December 31, 2009, KU reports approximately 23,000 primary voltage overhead conductor miles.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 243

Responding Witness: Chris Hermann

- Q-243. Please provide the total installed KU secondary voltage Overhead conductors footage.
- A-243. As of December 31, 2009, KU reports approximately 4,000 secondary voltage overhead conductor miles.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### **Question No. 244**

Responding Witness: William Steven Seelye

- Q-244. With respect to Mr. Seelye's KU zero-intercept analysis (summarized in Exhibits 21 through 23), please provide:
  - (a) statistical output including all diagnostic statistics;
  - (b) specific definition of dependent and independent variable(s) utilized corresponding to the data provided in each Exhibit;
  - (c) specific regression model (including coefficient);
  - (d) definition of "size" for each account;
  - (e) definition of "quantity" for each account; and,
  - (f) source documents supporting Mr. Seelye's regression data.
- A-244. (a) See response to KPSC-2 Question No. 77.
  - (b) For overhead conductor, the dependent variable is the average cost per foot of conductor. The independent variable is the size of the conductor in MCM. For underground conductor, the dependent variable is the average cost per foot of conductor. The independent variable is the size of the conductor in MCM. For line transformers, the dependent variable is the average cost per transformer and the independent variable is the size of the transformer category in KVA. The analysis uses weighted regression with the feet of conductor or number of transformers as the weights.
  - (c) See response to KPSC-2 Question No. 77.
  - (d) See response to (b).
  - (e) See response to (b).
  - (f) See response to KPSC-2 Question No. 77.

		·	

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 245

Responding Witness: William Steven Seelye

- Q-245. Please provide Seelye KU Exhibits 21 through 23 in executable electronic spreadsheets. In this response include all analyses and calculations conducted to develop each zero-intercept analysis.
- A-245. See response to KPSC-2 Question No. 77.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### Question No. 246

Responding Witness: William Steven Seelye

- Q-246. Please provide the following separated between primary and secondary (as available) by vintage year, size, and type for KU Account 365 (Overhead Conductors) in the greatest level of detail available:
  - (a) installed footage;
  - (b) gross investment;
  - (c) materials investment;
  - (d) capitalized labor; and,
  - (e) Handy-Whitman Cost Index or equivalent.

If all data is not available for all years, please provide the level of detail that is available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-246. See response to KPSC-2 Question No. 77. Gross investment includes both materials investment and capitalized labor. Hard copies are not being provided due to the volume of the data requested.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### Question No. 247

Responding Witness: William Steven Seelye

- Q-247. Please provide the following separated between primary and secondary (as available) by vintage year, size, and type for KU Account 367 (Underground Conductors) in the greatest level of detail available:
  - (a) installed footage;
  - (b) gross investment;
  - (c) materials investment;
  - (d) capitalized labor; and,
  - (e) Handy-Whitman Cost Index or equivalent.

If all data is not available for all years, please provide the level of detail that is available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-247. See response to KPSC-2 Question No. 77. Gross investment includes both materials investment and capitalized labor. Hard copies are not being provided due to the volume of the data requested.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 248

Responding Witness: William Steven Seelye

- Q-248. Please provide the following separated between primary and secondary as available by vintage year, size and type for KU Account 368 (Line Transformers) in the greatest level of detail available:
  - (a) installed units;
  - (b) gross investment;
  - (c) materials investment;
  - (d) capitalized labor; and,
  - (e) Handy-Whitman Cost Index or equivalent.

If all data is not available for all years, please provide the level of detail that is available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-248. See response to KPSC-2 Question No. 77. Gross investment includes both materials investment and capitalized labor. Hard copies are not being provided due to the volume of the data requested.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### **Question No. 249**

Responding Witness: William Steven Seelye

- Q-249. Please explain how and where Curtailable Rider revenue credits are reflected in the KU revenues in Exhibits 5, 6, and 7 and class cost of service study (Seelye Exhibits 19 and 20).
- A-249. Curtailable Rider revenue credits are included in the row labeled "Sales" on pages 23 through 25 of Seelye Exhibit 20. Curtailable Rider revenue credits are shown as CSR amounts on Seelye Exhibit 5.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### Question No. 250

# Responding Witness: William Steven Seelye

- Q-250. Please provide the following KU Exhibits associated with the electric operations filing in executable Excel format (include all linked files):
  - (a) Seelye Exhibit 2;
  - (b) Seelye Exhibit 4;
  - (c) Seelye Exhibit 5;
  - (d) Seelye Exhibit 6;
  - (e) Seelye Exhibit 7;
  - (f) Seelye Exhibit 8;
  - (g) Seelye Exhibit 9;
  - (h) Seelye Exhibit 10;
  - (i) Seelye Exhibit 12;
  - (j) Seelye Exhibit 15; and,
  - (k) Seelye Exhibit 16.

Please include in this response all the workpapers, spreadsheets, source documents, etc. that support the amounts, assumptions and calculations presented in these Exhibits.

A-250. See response to KPSC-2 Question No. 77. Additional workpapers, spreadsheets, source documents, etc. are provided in an attached CD, in the folder titled Question No. 250.

# **CASE NO. 2009-00548**

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 251

Responding Witness: Shannon L. Charnas

- Q-251. Please provide KU adjusted test year General plant by FERC account and sub-account.
- A-251. See attached.

# KENTUCKY UTILITIES COMPANY GENERAL PLANT IN SERVICE - ELECTRIC OCTOBER 2009

Account	Total
E389.20-Land	\$ 2,567,847
E390.10-Structures and Improvements	38,070,703
E390.20-Improvements to Leased Property	531,973
E391.10-Office Equipment	7,325,785
E391.20-Non PC Computer Equipment	8,217,918
E391.30-Cash Processing Equipment	448,191
E391.31-Personal Computers	4,508,257
E392.00-Transportation Equipment	18,763,692
E393.00-Stores Equipment	777,673
E394.00-Tools, Shop, and Garage Equipment	6,399,333
E395.00-Laboratory Equipment	3,160,382
E396.00-Power Operated Equipment	421,779
E397.00-Communication Equipment	20,821,298
E398.00-Miscellaneous Equipment	373,590
Total General Plant in Service - KY	\$ 112,388,421

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 252

Responding Witness: Shannon L. Charnas

- Q-252. Please provide KU adjusted test year CWIP in the greatest detail available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-252. See attached for the total Company balances. The requested information is also on the attached CD, in folder titled Question No. 252.

<u>Description</u>	Amount
GLENN LAKE ESTATES SUBDIVISION	\$ 43,054.40
MISC SUBSTATION PROJECTS-KU	306,091.30
RICHMOND RD HIGHWAY RELOCATION	5,547.08
HWY 52 RELOCATION RICHMOND	2,569.76
BALLARDSVILLE REGULATORS	9,517.55
HLN US421 BARN BR - VA LINE	29,784.77
TC2 - KU	469,823,897.03
SPCC MODIFICATIONS FOR KU	2,068,371.22
ACCRUED LABOR - KU	159,271.73
NESC FENCE REPLACEMENT	731.40
SCIENCE HILL HWY. 27	(3,805.11)
VIRGINIA CITY - CLINCH RIVER 138 KV	5,139,329.69
DEVELOPMENT FOR TRIMBLE COUNTY UNIT # 2	54,235,415.11
KU SUBSTATION SPILL PREVENTION	63,385.56
GH3 FGD	5,631,672.25
977 HAVEN HILL RD	89,239.91
FUEL SUPPLY MANAGEMENT SYSTEM	942,797.34
CLEAR 12-04 A&G KU	74,679.28
KU DIST. 34.5 KV STORM	30,860.54
KU TRANS. 34.5 KV STORM	33,857.17
BROWN ASH POND EXPANSION, PHASE 1 - DEVELOPMENT STAGE	26,876,486.00
KU SOX PROGRAM - GHENT 2 FGD SYSTEM	11,724,380.84
PURCHASE PMI POWER METERS	8,621.60
PURCHASE SPARE BREAKER & SWITCH 34.5K SYSTEM	40,800.28
GH4 FGD	3,126,722.61
GHENT SO2 COMMON	5,055,181.85
BROWN 1, 2, 3 FGD	343,346,115.35
W360 LTC REBUILD	36,642.39
KENTON - CARNTOWN 69 HWY	7,831.50
MISC. A/R UNCOLLECTIBLE - KU CAPITAL	21,937.00
KU RTU PURCHASES	(18,018.23)
EXTEND FIBER TO GREEN RIVER	44.98
TURBO BALANCER FOR PLANTS	(17,387.10)
DETROIT HARVESTER SECTION OF PARIS-LEX. PLANT	173,261.96
LAKE REBA - WACO 69KV LINE	15,465.00
161 KV INTERCONNECTION WITH ESTILL COUNTY ENERGY PARTNERS	50,181.93
PAYNES DEPOT RD (US 62) HIGHWAY	168,552.20
PURCHASE 161X69 SPARE TRANSFORMER	693,042.99
KU SUBS RTU INSTLLS FOR EKPC METERING	134,851.06
WAITSBORO TAP 69KV SOUTHWEST BYPASS RELOCATION .	1,333.09
GH3 CATALYST LAYER PURCHASE & INSTALLATION 2008-2009	1,142,172.16
FIRE PROTECTION SYSTEM EQUIPMENT - ONE QUALITY	92,903.00
TRIMBLE COUNTY ASH/GYPSUM PONDS	4,336,023.10
TC2 AQCS KU	183,675,617.31

Description	Amount
INSTALL SWITCH AT BUENA VISTA SUBSTATION	186,386.24
AVON TAP 69KV RELOCATION	2,537.22
UNION UNDERWEAR NEW TRANSFORMER ADDITION IN SUB 642	46,065.57
SCM EARL SUBSTATION REP (PURCHASE S&C FUSES)	7,636.91
SCM TRANSFORMER REWINDERS	192,566.86
BROWN NORTH TRANSFER TRIP RECEIVER REPLACEMENT	11,348.24
NEW DOUBLE CKT TO CITATION BLVD	141,898.43
UNDERGROUND RELOCATION FOR THE UK CHANDLER MEDICAL CENTER	(70,385.57)
DIX1 OVERHAUL	4,547.56
DIX3 OVERHAUL	3,475,733.80
LANCASTER SUB EKP 69KV TIE	(1,364.16)
GH DOWNRIVER FLOATING WORK BARGE	811,793.28
DAVIESS CO 345KV TIE	343.59
MILLERSBURG CONTROL HSE REPL	164,327.97
LOUDON STORAGE LOT & FENCE REPAIR	50,790.59
BROWN C.T. BARDSTOWN 138KV LINE POLE REPLACEMENT	39,456.64
SO3 SORBENT INJECTION	5,350,976.50
GHENT 345KV BREAKER ADDITION	629,669.33
LAND MOBILE RADIO SYSTEM BUILDOUT	4,144,006.07
MILL CREEK - HARDIN COUNTY OPGW	53,352.98
RELIEVE LOAD PARKERS MILL SUB 2	75,180.04
PURCHASE PROPERTY LEXINGTON EAST AREA SUBSTATION	792,599.21
DIAMOND SUB TRANSFORMER	66,205.14
EL SUB ABB TRANSFORMER REPLACEMENT	291,042.27
RELOC KU HWY 286 PROJ	(4,676.33)
ORACLE IEXPENSE/FILENET IMAGING	75,078.24
KU RTU PURCHASE 2007	(1,194.09)
DISTRIBUTION CAPACITORS KU	371,803.40
SAP FOR CCS - KU	626,965.56
NEW BASE GENERATING UNIT - KU	987.68
GHENT ASH POND/LANDFILL	3,156,452.76
RELOC RING RD PROJ (345KV)	204.02
REPL. SUBSTATION BATTERIES	60,968.26
BR2 PRECIPITATOR PLATE REPLACEMENT 08 (ECR)	(13,251.48)
RELOC HARDIN CO - BONVILLE 69KV	30,291.99
DUNCANNON ROAD HIGHWAY RELOCATIONS	488.48
CCS - KU BUSINESS INTELLIGENCE	47,333.77
CCS - CUSTOMER SERVICE KU	83,029.86
CCS - DEVELOPMENT KU	19,987.74
CCS - TECHNOLOGY KU	20,639.86
REPLACE FAILED WEST CLIFF TRANSFORMER T-477	86,961.39
GR SUMP PUMPS	120,066.55
COMPUTER TELEPHONY INTEGRATION REPL. KU	298,933.77
KU CARPET & TILE REPLACEMENT	92,932.58

<u>Description</u>	Amount
KU FIRE PROTECTION SYSTEMS	25,605.36
KU OFFICE FURNITURE & EQUIPMENT	25,638.82
CITY OF BARDSTOWN SUB	738,530.46
HUTCH PH3 RECONDUCTOR	62,388.71
LOAD LOGGER	22,501.94
STAMPING GROUND INSTALL 10 MVA TRANSFORMER	773,198.19
CKT 412 RECONDUCTOR 2/0 TO 795	157,101.42
SC&M WILDLIFE PROTECTION PINEVILLE	11,072.17
SCM PINEVILLE 2008 NESC VIOLATIONS	43,453.73
SCM CENTRAL 08 REPLACE	46,274.16
RICHMOND #069-6 BREAKER ADDITION	47,448.84
WILDLIFE PROTECTION	25,863.08
SCM CENTRAL 08 PURCHASE REGULATORS	29,897.35
OVERHEAD DOOR REPLACEMENT	12,189.83
SUBSTATION CONST. & MAINT. TOOLS	19,718.11
REPLACE TRANSFORMER 7/14 WOODLAWN	459,831.71
SCM EARL 08 NESC CORR.	79,149.27
SCM EARL ON LINE FILTERS	20,065.76
SCM EARL MADISONVILLE SO RET	25,063.05
REPLACE DEFECTIVE HEA 11 LOCKOUT RELAYS	16,675.17
SCM CENT SPARTA UPGRADE	118,269.43
08 SCM REP REWIND	944,036.59
FRAZIER RELOCATION FOR KOHL'S IN RICHMOND	17,039.82
IN 10 MVA BASE (14) LTC TRANSFORMER & ASSOC EQUIP	20,275.60
AREA 1 IMPROVEMENTS	15,838.17
AREA 2 IMPROVEMENTS GREENVILLE BUSINESS OFFICE	8,247.47
TY3 CNTRL WORKSTN UPGR 08	18,074.92
INST ARMSTRONG COAL 69 TAP	737.16
CT7 A/B CONVERSION 08 - KU	(1,168,369.93)
GDS IMPLEMENTATION - KU	29,073.13
UK HOSPITAL DISTRIBUTION RELOCATION UG INSTALLATION PORTION	(6,813.25)
UK HOSPITAL DISTR RELOC INSTALL LIMESTONE	(97,574.48)
UK HOSPITAL DISTRIBUTION RELOC. O/H INSTALL. ALONG COOPER	39,342.88
UK HOSPITAL DIST. RELOC. O/H INSTALL. ALONG WOODLAND & EUCLID	20,355.12
UK MED. CTR. CONTROL HOUSE RELOC.	365,492.86
TC CT PURCHASE/INSTALL UCVG CONTROLLER	18,670.63
PLACE OVERHEAD & UNDERGROUND FEEDER TO BRUSS INDUSTRIES	46,646.40
UK FIBER RELOCATION	33,586.19
NORTH KY BACKBONE RENOVATION	951,601.62
OUTSIDE CABLE PLANT - KU	90,262.70
E.W BROWN UNIT 3 SCR CONCEPTUAL ENGINEERING	1,329,335.55
EWINGTON #539 BREAKER ADDITION	68,536.67
LOUDEN AVENUE HAEFLING 138KV HWY RELOC	21,211.24
CORNING MOTORIZED 69KV 2 WAY 1200 AMP	(39,673.14)

<b>Description</b>	Amount
BARDSTOWN INDUSTRIAL	85,687.65
ORACLE IPROCUREMENT PUNCHOUT XML PRO CARD	26,506.98
EMS OSI WORKSTATIONS	25,200.00
CRITICAL SPARE 161/69 KV TRANSFORMER	865,819.84
CRITICAL SPARE 138/69 KV TRANSFORMER	861,604.25
BRYANT RD 69 KV TAP	48,503.35
RELOC HWY 60 BYPASS PROJ	85,744.90
CONSTRUCT NEW CKT FROM	305,920.46
BRYANT ROAD 3 EXIT CIRCUITS	50,066.81
SOMERSET NORTHERN BYPASS I-66	36,659.48
INST RIVER VIEW MINE 69 TAP	68,870.65
BRYANT ROAD #3 SUBSTATION & TEMP TRANSF	1,189,742.47
BRYANT ROAD #3 EXIT CIRCUIT	133,721.16
HAEFLING 714 FOR INNOVATION DR	143,450.07
INNOVATION DRIVE SUBSTATION 138KV TAP	551,483.01
ELECTRIC ENHANCE OH DISTRIBUTION	(87,284.10)
WINTER STORM 2-11-08	(3,156.64)
SALE OF LINES	(15,334.46)
INCREASE UNDERFREQUENCY LOAD SHEDDING CAPACITY WITH YR END SI	56,206.39
2009 BEREA NORTH METERING	86,523.80
SPRINGFIELD SOUTHWEST BYPASS	(39,018.80)
BOND ST PAUL VACTY CLINCHRIV	31,300.51
GS LARGE FORMAT EQUIP 2009 KU	31,196.86
PLANT LAB EQUIPMENT UPGRADE	49,174.81
BRCT ICE PLANT SITE SECURITY 09	30,017.73
REVISED BRCT 11N2 PI INTERFACE	27,363.85
GAS CHRMATOGRAPH TOGAS REPLACEMENT KU	36,218.90
GS CEMS DILUTION PROBES - KU	41,247.78
DATA QUALITY INITIATIVE KU	44,745.40
US 27 HIGHWAY RELOCATION INVOLVING LANCASTER TO DIX 69KV LINE	36,426.26
GH CONVEYOR REPLACEMENT 2009	168,883.20
GH4 BLOWDOWN TANK	114,260.55
GH3 ECONOMIZER REPLACEMENT	270,795.00
BR1 ESP INTERLOCK 09	18,646.47
DX EXP JOINT REPL 09	43,886.78
DOW CORNING W CARLTON 138KV	608,579.87
BR CONVEYOR BELT REPL 09	7,426.89
PVL 161-69KV 150 MVA TRANSF RPL	706,658.44
PURCHASE SPARE TRANSMISSION CIRCUIT BREAKERS	113,776.43
INST ARMSTR DOCK 69 TAP	3,497.72
REPLACE UNDERRATED 69KV BREAKERS FAWKES SUBSTATION	190,341.11
ASPEN ONE LINER SOFTWARE PURCHASE & IMPLEMENTATION	5,316.06
TC CT LUBE OIL VARNISH REMOVAL UNITS	68,688.86
COMPUTER RELATED EQUIPMENT	28,804.84

<u>Description</u>	<b>Amount</b>
FUTURE STORM PROJECT	(118.22)
GH1 CONDENSER RETUBE	232,588.82
CARROLLTON METAL & THERMIT 69KV SYSTEM PARAMETERS	157,550.87
SIMP SHELBY TRANS POLE RPL	105,423.07
BRCT 20 GAS PIPELINE HWY 27 RELOCATION	17,225.24
SYSTEM PROTECTION NEW BRYANT RD FEEDER	91,983.97
PURCHASE DATA RECORDERS	14,361.62
EMINENCE SUBSTATION	1,074.74
2009 SCM CENTRAL HOOVER SUBSTATION	735,173.32
2009 CENTRAL DSP NEWTOWN SUBSTATION	65,574.03
OKONITE SUBSTATION	687,013.15
2009 CENTRAL DSP ROGERS GAP SUBSTATION	580,110.06
NEW HAVEN SUB REPLACE TRANSFORMER	221,376.53
CYNTHIANA PURCHASE AND INSTALL STRUCTURE AND METERING	7,144.22
REPLACE DEFECTIVE HEA11 LOCKOUT RELAYS	10,607.14
09 CENT REPLACE BUSHINGS	226.09
2009 BREAKER REPLACEMENT WILSON DOWNING CIR. 73 BB-0034	17,447.16
RECONFIGURE 2ND FLOOR OFFICE AT 745 NORTH LIMESTONE	6,642.20
REBUILD DAWSON 4KV	23,416.00
KUTTAWA SUB REBUILD	37,997.40
09 EARL BATTERIES	371.10
09 EARL MISC SUBSTATION	93,785.59
SCM PINE 2009 NESC VIOLATIONS	24,920.09
SCM PINEVILLE SUB MISC 2009	61,722.40
SCM PINE RP FAILED BREAKERS IN PINEVILLE	10,011.05
SCM PINE RP FENCES PINEVILLE SUB AREA 2009-05782	8,490.46
09 EARL WILDLIFE PROTECTION	10,660.70
SC&M PINEVILLE 2009 WILDLIFE PROTECTION	10,069.82
SIMPSONVILLE US 60 FEEDER 09	159,043.01
ELECTRIC-ENHANCE OH DISTRIBUTION	60,107.66
SMALLWORLD 1.1.1 UPGRADE	141,499.02
MOBILE GIS MODULES - KU	20,151.63
2009 ELECTRIC OMS	27,890.82
MOBILE INFRASTRUCTURE KU	159,454.35
OSAKA EAST CIRCUIT	12,420.55
KU PC & PRINTER INFRASTRUCTURE	68,042.70
2009 DISTRIBUTION OPER. CARRY OVER PROJECTS	5,315.01
AMERICAN AVE/UK MED RELAY REPLACEMENT	18,563.81
UK MED/RACE STREET RELAY REPLACEMENT	12,831.40
RACE STREET/UK MED RELAY REPLACEMENT	21,595.10
152-704 LINE DIFFERENTAL RELAY REPLACEMENT	12,455.61
152-784 LINE DIFFERENTAL RELAY REPLACEMENT	9,837.20
227-704 LINE DIFFERENTAL RELAY REPLACEMENT	9,801.76
227-714 LINE DIFFERENTAL RELAY REPLACEMENT	9,841.96

<u>Description</u>	<b>Amount</b>
117-754 LINE DIFFERENTAL RELAY REPLACEMENT	9,661.58
117-764 LINE DIFFERENTAL RELAY REPLACEMENT	14,605.09
REGULATORS CIRCUIT 631 2009-06107	3,106.93
OKONITE EXIT CIRCUITS	59,461.68
REMOVE BANFORD LINE	1,346.22
HARLAN CIRCUIT 4406 RECONDUCTOR	244,212.00
FOURMILE RECONDUCTOR ELECTRIC	174,210.16
MIDDLESBORO 4KV REPLACE CROSSARMS	11,395.44
ADD A THIRD PHASE OF 2/0 OUT RUSSELL CAVE RD LEX	66,148.96
RUSSELL CAVE 167 REGULATORE - DONERAIL CKT 0105	44,080.69
SHELBYVILLE-SIMPSONVILLE 69KV THERMAL UPGRADE	741,464.59
BRIAR HILL ROAD 69/4.3KV 7.5MVA LTC TRANSFORMER AND SUBSTATION	99,643.90
2009 CENTRAL RICHMOND SUB	577,029.60
09 CENTRAL TRANSFORMER REWINDS	862,447.47
RETAIL BUSINESS OFFICES - MISC CAPITAL (SAFES)	42,223.52
2009 ERTS KU	108,910.41
POWERMATRIX EQUIPMENT KU	109,205.28
CONCRETE SLAB for WIRE REELS AT CAMPBELLSVILLE STOREROOM	7,220.70
PURCHASE TRAILER FOR HAULING PAD MOUNTED TRANSFORMERS	12,925.47
HIGBY MILL UK MED CENTER SYSTEM PARAMETERS	303,884.99
DORCHESTER 814 CARRIER REPLACEMENT	10,261.05
DORCHESTER 804 CARRIER REPLACEMENT	10,261.05
IMBODEN 608 CARRIER REPLACEMENT	6,036.43
HARLAN WYE 814 CARRIER REPLACEMENT	10,261.05
HARLAN WYE 804 CARRIER REPLACEMENT	10,388.54
UK MED RELAY COMMUNICATIONS UPGRADE	21,870.79
AMERICAN AVE RELAY COMMUNICATIONS UPGRADE	15,882.65
HIGBY MILL RELAY COMMUNICATIONS UPGRADE	19,519.05
HOGBY MILL/UK MED RELAY REPLACEMENT	25,765.02
ROCKY BRANCH TO POCKET 69 KV CAWOOD STR 85	(31,557.36)
ELECTRIC - OH PUBLIC WORKS PROJECTS	92,292.39
KU OS FAC IMPROVEMENTS (GREEN INITIATIVE)	119,355.33
GREEN INITIATIVES-KU (ONE QUALITY BLDG)	99,988.00
SECURITY EQUIPMENT-ONE QUALITY	5,661.42
RETAIL FACILITIES (FACILITY IMPROVECAMPBELLSVILLE BUS. OFFICE)	174,771.34
DISTRIBUTION- KU FACILITIES IMPROVE EARLINGTON OPER. CTR	267,360.99
REPLACE DELVINTA 139-834 METERING CURRENT TRANSFORMERS	26.28
INSTALL 138 KV BREAKER ON THE LAKE REBA TAP 161/138KV TRANSF.	131,408.43
INSTALL 138KV BREAKER ON THE RODBURN 138/69KV TRANSFORMER	168,452.44
INSTALL A 161 KV BREAKER ON PINEVILLE TO PINEVILLE SWITCHING	105,551.40
HIGBY MILL 138/69KV 120 MVA TRANSFORMER ADDITION	633,385.29
DIGITAL FAULT RECORDER STUDY - KU	405,142.39
GHENT SUBSTATION RELAY UPGRADE	479,783.43
BROWN ASH POUND PHASE 1	87,473.35

# <u>KU 107001 CWIP Balance</u> <u>As of October 31, 2009</u>

<b>Description</b>	Amount
STELLENT UPGRADE	23,803.42
HW/SW DEV TOOLS KU - 026580	807.75
HW/SW DEV TOOLS KU	4,139.53
ITSD HW/SW PG KU	8,877.50
HW/SW DEV TOOLS 026560-KU	2,847.15
HW/SW DEV TOOLS 026570-LGE	3,154.91
IT SEC MON/AUD/MGMT TOOLS	19,720.09
ACCESS SWITCH REPLACEMENT KU	153,921.13
CORE NETWORK INFRASTRUCTURE	75,552.28
DATA NETWORKS TEST TOOLS KU	5,439.68
NTWK ACCESS DEVICE/GATEWAY-KU	13,506.87
NETWORK MANAGEMENT SYSTEMS KU	24,663.61
PIX FIREWALL REP/UPG KU	100,965.37
SEC INFRASTRUCTURE ENCHANCE KU	25,717.78
VPN SWITCH UPGRADE KU	92,584.72
BACKUP CAPACITY EXPANSION-KU	108,682.86
SAN SWITCH CAPACITY EXP-KU	39,120.41
SAN SWITCH REFRESH KU	248,322.66
MID-LEVEL STORAGE REFRESH-KU	61,632.04
CABLING SERVER CONNECT KU	8,063.10
SERVER HARDWARE REFRESH - KU	190,947.02
STORAGE CAPACITY VIRTUAL KU	118,367.27
ODP FIBER BUILDOUT Y1/2-KU	2,660.73
OUTSIDE CABLE PLANT KU	67,253.64
BULK PWR ENV SYSTEMS KU	45,434.53
ALCATEL CHANNEL BANK REPLACEMENT	238,892.10
KU TELLABS DACS REPLACE KU	582,601.22
MOBILE RADIO KU	34,107.36
NETWORK ACCESS DEV SITE INFRA KU	58,414.97
NETWORK TOOLS & TEST EQUIP	25,348.91
TOWER REPLACE (BOOGER MTN)-KU	35,089.66
TELEPHONE SYSTEM CAPACITY EXP	73,942.72
SEC FIBER CONNECT SIMPSON KU	9,906.48
NEW CONFERENCE BRIDGE-	4,799.42
MONITOR REPLACEMENT KU	9,305.53
TIER C ROTATE DESKTOP/LAPTOPS KU	404,986.65
TECH TESTLAB & RELATED 2008-KU	12,631.12
LOUISVILLE ELECTRICAL UPG KU	22,533.42
LOU RACK FURNITURE KU	11,916.12
SIMPSONVILLE RACKS & FURNITURE KU	9,868.26
SIMPSONVILLE ELECTRIC UPG KU	33,168.17
DATA BASE TOOLS AND EQUIP-KU	22,556.50
PROJ MIRROR-DATABASE TECH	24,746.97
UPGRADE TO SQL 2008-KU	24,085.13

<u>Description</u>	Amount
PROJECT MIRROR GOLD LEVEL SERVICE - KU	700,505.94
REPLACE FARLEY BREAKER	52,369.72
LEXMARK 69KV 6 MVAR CAPACITOR BANK	(62,603.07)
POWERPLAN BUDGETING - KU	4,524.67
AVON NORTH 69 KV TAP	16,416.35
RACE STREET RELAY COMMUNICATIONS UPGRADE	3,641.89
KRT09 FARLEY RTU	16,747.64
SPINDLETOP PURCHASE & INSTALL 10/14 MVA TRANSFORMER	(262.49)
ELIHU SUBSTATION - RTU UPGRADE	52,233.72
PRIMATE TECHNOLOGIES BLACKBOARD	10,207.11
DIX DAM NETWORK UPGRADE	45,584.32
LAKE REBA 163-BGAD 138KV LINE	682,439.91
EKP-TAYLOR CO REA INSTALL RTU	408.41
2009 SCM CENTRAL DSP EWINGTON SUB	659,522.81
INNOVATION DR INSTALL 10/14 MVA TRANSF. HV BREAKER & SW/GEAR	(120,448.67)
ROBBINS NEW HARLAN CUMBERLAND & COAL CKT	124,696.65
BELL COUNTY COAL GARMEADA #2	811,530.08
COLDSTREAM REDUNDANT FEED	(225,627.00)
LEXINGTON DOWNTOWN ALONG LIMESTONE OH TO UG	44,190.55
DX CONTROLS RELOCATION & UPGRADE	28,275.95
REPLACE OHIO CO 69KV DOUBLE BUSHING PTS	22,796.81
REPLACE HARLAN Y 161KV POTENTIAL TRANSFORMERS	41,851.58
EDISCOVERY	141,327.27
OPTIO REPLACEMENT ORACLE BI PUBLISHER & RIGHTFAX	18,588.80
TC CT BOROSCOPE	26,747.06
SPARE POTENTIAL TRANSFORMERS FOR KU	48,492.33
RICHMOND STOREROOM PAVING	20,655.25
RELOC. 7200FT. ANDOVER TO DORCHESTER	179,939.11
2009 CALL CENTER TECH UPGRADES	11,024.00
2009 PC PURCHASES	49,178.27
BUSINESS OFFICE TECH UPGRADES	6,524.67
CENTRALHARDIN 138KV LOOP	811.06
INST EQUALITY TAP 69	130,979.81
GARRARD COUNTY JUDICIAL CENTER	1,059.71
REPLACE DOW CORNING WEST BREAKER 217-708	95,724.89
REPLACE DOW CORNING WEST BREAKER 217-718	87,406.01
REPLACE GREEN RIVER STEEL BREAKER 100-724	114,755.87
REPLACE GREEN RIVER BREAKER 009-788	109,440.10
REPLACE TYRONE BREAKER 065-714	114,474.84
REPLACE TYRONE BREAKER 065-724	105,140.88
REPLACE SURGE ARRESTERS	74,061.25
ELECTRIC-CUSTOMER REQUESTED PROJECTS	68,304.07
GR EMERGENCY GENERATOR	90,946.43
CARNTOWN SUBSTATION RTU INSTALLATION	69,857.17

Description	Amount
REPLACE DOW CORNING WEST BREAKER 217-704	87,317.59
REPLACE DOW CORNING WEST BREAKER 217-714	84,541.02
REPLACE GHENT BREAKER 165-708	126,520.91
TY3 T/G-BIR DEHUNIDIFICATION	63,168.85
GH WATER TRUCK 09	31,924.42
KTU09-BROWN REACTORS	20,228.79
KCA09-B NORTH-ALCALDE	228,674.11
PHOENIX COAL SUBSTATION UPGRADE (NEW BUSINESS)	31,533.95
KR09-S PADUCAH CONTROL HOUSE	578,213.92
GRAHAMVILLE COLEMAN RD 161KV REBUILD	680,019.04
GRAHAMVILLE DOE 161KV LINE	88,289.70
KU09 BATTERIES, LU09-BATTERIES	53,231.99
GR NO 1 PLANT AIR COMPRESSOR	30,623.72
SURVEY INSTRUMENT PURCHASE	20,093.38
KMPA PRINCETON 161KV TAP	171.37
TRANSMISSION CONTROL CENTER ADDITIONAL OFFICE SPACE	2,245.67
GR 4-1 ID FAN MOTOR	59,047.25
PAD COLEMAN RD 161KV TAP	(372.20)
HZ PANEL REPLACEMENT	191,882.98
UPGRADE PROTECTION SCHEME BETWEEN PINEVILLE SUB AND KU PART	39,973.76
MICROSOFT LICENSES	25,687.08
KREIM-CENTRAL HARDIN	1,969.78
KMPA SUBSTATION ADDITIONS	122,675.44
ORACLE DATA STORAGE KU (2009)	5,701.66
OPEN ENROLLMENT	23,715.96
INTERNAL AND EXTERNAL OUTAGE COMMUNICATIONS	68,426.39
ERT TOOLKITS	66,708.46
EPERFORMANCE KU	134,603.87
SV FRQ SOURCE	2,038.33
BOONSEBORO PARK 67/13-99KV 7.5MVA LTC TRANSFORMER & SUB	24,622.66
HIGBY MILL RECONFIGURATION	3,964.25
GH SUB BREAKER 944 REPL.	356,903.50
DIX 1 & 2 GSU REWINDS	290,960.98
BADGER COMMUNICATION EQUIPMENT	83,406.48
KENTON 744 TERMINAL UPGRADE	8,615.32
TREND MICRO LICENSES KU	22,246.20
BR2 CRUSHER HOUSE FEEDER 09	32,142.58
BR BOAT MOTOR AND TRAILER	3,615.50
EMINENCE SUBSTATION CKTS 2535,2501, & 2502	1,154.65
APPALACHIA CIRCUIT WORK	28,712.83
DIX CONTROL CENTER WORK	25,165.55
APPALACHIA SUB CONVERT TO 12KV & ENLARGE TO 10.5MVA	5,636.42
WESTVACO SUBSTATION REMOTE TERMINAL UNIT (RTU) REPLACEMENT)	35,052.56
BR1 UPPER REAR ARCH REPL 09	214,221.97

<u>Description</u>	<u>Amount</u>
EMS OSI WORKSTATIONS	32,430.75
MS PROJECT 2007 - KU	11,925.62
REPLACE ORACLE SERVERS - KU	61,224.52
161-161KV XFORMER BKR	1,860.81
161-161KV BUS TIE SWITCH	6,150.95
BRCT6 QUENCH COOLER NOZ REPL - KU	116,152.53
HP D2D SOLUTION	22,857.50
PV 345 PANELS	673.86
GR 2009 PULVERIZER MOTOR	54,657.81
REWIND BR3 MOTORS (2) 09	24,716.35
CSS REDESIGN	3,698.75
BR1 REAR/SIDE WALL ASB REM 09	15,906.99
MISC. TRANSMISSION 2008 CAPITAL	196,602.06
BLDG. & GROUNDS MAINT. RC 315	9,593.14
BEHIND THE METER 156	(26.60)
BEHIND THE METER 216	376.48
BEHIND THE METER 256	937.94
BEHIND THE METER RC 426	298.19
TRANS. LINE RELOC. KU - 2008	40,132.43
RELOCATE TRANS. LINES KU 2009	107,442.48
NEW FACILITIES TRANS. LINE 2008	126,285.27
NEW FACILITIES TRANS. LINE 2009	382,919.98
PARAMETER UPGRADE T LINE PWO	17,659.39
K7 PARAMETER UPGRADES TRANS. LINE 2008	109,371.16
T-LINES PARAMETER UPGRADES 2009	67,946.62
STORM DAMAGE T-LINE PWO	92,699.24
KU 2008 BLANKET	1,329.98
STORM DAMAGE TRANS. LINE 2009	10,681,314.16
PRIORITY REPL T-LINES PWO	59,326.99
PRIORITY TRANS. LINE 2008	438,855.24
PRIORITY TRANS. LINE REPL. KU 2009	1,952,564.89
KU MISC. TRANS. SUB CAPITAL 2009	558,572.80
TRANSMISSION TERMINAL UPGRADES	85,021.27
LINE LOCATION RC156	23,987.74
LINE LOCATING 014160	(112.90)
CAP/REG/RECL - 01246	13,755.64
RECL/REG/MAINT - MAYSVILLE	327.60
PURCHASE OF METERS 315	6,970.10
PURCHASE OF METERS	8,534.74
New Bus Comm-Ovhd-Earlington	(4,398.48)
New Bus Comm-UG-Earlington	(2,637.35)
NEW BUSINESS COM 216	4,975.86
New Bus Comm-Ovhd-Danville	3,797.56
New Bus Comm-UG-Danville	6,564.58

<b>Description</b>	<u>Amount</u>
New Bus Comm-Ovhd-Richmond	(3,390.20)
New Bus Comm-UG-Richmond	12,397.59
New Bus Comm-Ovhd-Etown	773.36
New Bus Comm-UG-Etown	40,410.10
New Bus Comm-Ovhd-Shelbyvl	(135,948.19)
New Bus Comm-UG-Shelbyville	16,366.13
New Bus Comm-Ovhd-Lexington	1,042.87
New Bus Comm-UG-Lexington	33,213.79
New Bus Comm-Ovhd-Maysville	9,262.82
New Bus Comm-UG-Maysville	4,932.82
New Bus Comm-Ovhd-Pineville	14,206.40
New Bus Comm-UG-Pineville	2,782.20
New Bus Comm-Ovhd-London	67,185.99
New Bus Comm-UG-London	21,257.18
NEW BUSINESS COM 766	1,163.30
New Bus Comm-Ovhd-Norton	7,171.67
New Bus Comm-UG-Norton	20,856.49
New Bus Ind-Ovhd-Earlington	72,992.00
New Bus Ind-UG-Earlington	704.55
NEW BUSINESS IND 216	109.30
New Bus Ind-Ovhd-Danville	61,540.33
New Bus Ind-UG-Danville	7,616.98
New Bus Ind-Ovhd-Richmond	1,811.82
New Bus Ind-UG-Etown	239,590.46
New Bus Ind-Ovhd-Shelbyvl	9,731.22
New Bus Ind-UG-Shelbyville	200.75
New Bus Ind-Ovhd-Lexington	(2.32)
New Bus Ind-UG-Lexington	8,931.46
New Bus Ind-Ovhd-Maysville	1,918.79
New Bus Ind-Ovhd-Pineville	692.91
New Bus Ind-Ovhd-London	12,311.62
New Bus Ind-UG-London	43,034.61
New Bus Ind-UG-Norton	198.94
NEW BUSINESS MINE POWER 156	53.85
New Bus Resid-Ovhd-Earlington	(17,064.58)
New Bus Resid-UG-Earlington	51,425.54
NEW BUSINESS RES 216	125.56
New Bus Resid-Ovhd-Danville	(17,055.09)
New Bus Resid-UG-Danville	158,714.16
New Bus Resid-Ovhd-Richmond	43,940.72
New Bus Resid-UG-Richmond	31,623.98
New Bus Resid-Ovhd-Etown	(2,884.54)
New Bus Resid-UG-Etown	46,345.53
New Bus Resid-Ovhd-Shelbyvl	4,443.15

	<b>Description</b>	<u>Amount</u>
New Bus Resid-UG-Shelbyville		21,703.13
NEW BUSINESS RES 315		29,013.97
New Bus Resid-Ovhd-Lexington		(24,702.81)
New Bus Resid-UG-Lexington		120,607.37
NEW BUSINESS RES 366		14,742.78
New Bus Resid-Ovhd-Maysville		(16,794.45)
New Bus Resid-UG-Maysville		(24,570.91)
NEW BUSINESS RES 416		358.81
New Bus Resid-Ovhd-Pineville		(7,412.91)
New Bus Resid-UG-Pineville		95,912.46
NEW BUSINESS RES 426		490.10
New Bus Resid-Ovhd-London		164,871.78
New Bus Resid-UG-London		125,401.51
New Bus Resid-Ovhd-Norton		(62,497.17)
New Bus Resid-UG-Norton		(6,003.83)
New Bus Subd-Ovhd-Earlington		6,974.75
New Bus Subd-UG-Earlington		647.37
New Bus Subd-Ovhd-Danville		37,349.94
New Bus Subd-UG-Danville		9,806.54
New Bus Subd-Ovhd-Richmond		10,308.85
New Bus Subd-UG-Richmond		37,335.05
New Bus Subd-Ovhd-Etown		43,656.39
New Bus Subd-UG-Etown		43,619.64
New Bus Subd-Ovhd-Shelbyvl		494.35
New Bus Subd-UG-Shelbyville		(181,299.87)
New Bus Subd-Ovhd-Lexington		(1,243.07)
New Bus Subd-UG-Lexington		214.03
New Bus Subd-Ovhd-Pineville		15,294.36
New Bus Subd-UG-Pineville		117,768.36
New Bus Subd-Ovhd-London		22,122.92
New Bus Subd-UG-London		3,746.10
New Bus Subd-Ovhd-Norton		14,351.45
New Bus Subd-UG-Norton		45,093.39
New Bus Serv-UG-Richmond		(81.40)
New Bus Serv-UG-Shelbyville		37,747.42
New Bus Serv-UG-Maysville		(13.45)
New Elect Serv-Ovhd-Pineville		53,376.63
New Elect Serv-Ovhd-Norton		1,538,697.98
NON REG. REL. INSP. RC156		6,162.75
NON-REG REL. INSP. 017660		774.45
Pub Wrk Reloc-OH-Earlington		15,410.58
Pub Wrk Reloc-UG-Earlington		153.20
Pub Wrk Reloc-OH-Danville		338,293.97
Pub Wrk Reloc-UG-Danville		2,704.56

<b>Description</b>	Amount
Pub Works Relc-OH-Richmond	195,643.05
Pub Wrk Reloc-UG-Richmond	6,158.42
Pub Wrk Relc-OH-Etown	475,754.02
Pub Wrk Reloc-UG-Etown	3,222.63
Pub Wrk Reloc-OH-Shelbyvl	143,876.46
Pub Wrk Reloc-UG-Shelbyville	1,435.81
Pub Wrk Reloc-OH-Lexington	1,184,925.08
Pub Wrk Reloc-UG-Lexington	42,904.98
Pub Wrk Reloc-OH-Maysville	194,284.94
Pub Wrk Reloc-OH-Pineville	57,085.35
Pub Wrk Reloc-OH-London	190,964.83
Pub Wrk Reloc-UG-London	38,714.56
Pub Wrk Reloc-OH-Norton	124,336.05
Pub Wrk Reloc-UG-Norton	(6,074.79)
POLE TREAT 216	1,987.71
POLE TREAT 236	248.98
RELOCATIONS CUST REQUEST 156	30,627.21
RELOCATIONS CUST REQUEST 216	(153,291.90)
RELOCATIONS CUST REQUEST 236	9,974.41
RELOCATIONS CUST REQUEST 246	3,250.68
RELOCATIONS CUST REQUEST 256	25,882.13
RELOCATIONS CUST REQUEST 315	(2,314,520.23)
RELOCATIONS CUST REQUEST 336	(6,808.00)
RELOCATIONS CUST REQUEST 366	(23,607.49)
RELOCATIONS CUST REQUEST 416	28,873.94
RELOCATIONS CUST REQUEST 426	11,949.85
RELOCATIONS CUST REQUEST 766	(360,736.78)
Rep Def Equip-UG-Greenville	865.80
DAMAGE DEFECTIVE DIST 216	6,095.31
DAMAGE DEFECTIVE DIST 366	787.79
POINTS OF INTEREST EARLINGTON	6,881.59
POINTS OF INTEREST - DANVILLE	4,500.34
POINTS OF INTEREST - RICHMOND	11,336.98
POINTS OF INTEREST ETOWN	4,575.63
POINTS OF INTEREST SHELBY	4,014.36
POINTS OF INTEREST LEXINGTON	21,059.24
POINTS OF INTEREST MAYSVILLE	30,101.33
POINTS OF INTEREST PINEVILLE	1,652.57
POINTS OF INTEREST LONDON	7,439.26
POINTS OF INTEREST NORTON	6,610.97
POLE REP./REPL. 766	(5.42)
REP REPL DEF ST LIGHTS 216	(1.04)
REP REPL DEF ST LIGHTS 256	397,690.43
REP REPL DEF ST LIGHTS 366	439,981.74

<u>Description</u>	<u>Amount</u>
KU GENERAL RELIABILITY	329,140.53
DIST RELIABILITY 156	37,389.52
RELIABILITY O/H 156	14,264.48
DIST RELIABILITY 216	1,527.82
RELIABILITY RECONSTRUCTION 216 OH	11,239.56
CIRCUIT HARD REL. U/G 216	6,430.85
RELIABILITY RECONSTRUCTION 236 OH	85,246.30
DIST RELIABILITY 246	2,357.07
RELIABILITY RECONSTRUCTION 246 OH	201,190.28
RELIABILITY O/H 256	66,394.31
CIRCUIT HARD RELIABILITY UG - RC 012560	975.55
DIST RELIABILITY 315	7.74
CIRCUIT RELIAB. O/H 315	99,033.78
RELIABILITY RECONSTRUCTION 366 OH	13,553.56
DIST RELIABILITY 416	1,283.92
RELIABILITY RECONSTRUCTION 416 OH	118,312.39
RELIABILITY AND RECONST. OH RC426	787.69
CIRCUIT HARD RELIABILITY UG 426	68.12
CIRCUIT HARD REL OH NORTON	5,963.05
CIRCUIT HARD RELIABILITY UG RC766	2,215.35
REP THRD PARTY DAM 156	31,525.89
REP THRD PARTY DAM 166	3,804.47
REP THRD PARTY DAM 216	8,715.90
REP THRD PRTY DAM 236	9,105.70
REP THRD PARTY DAM 246	19,484.28
REP THRD PARTY DAM 256	29,341.60
REP THRD PARTY DAM 315	4,024.60
REP THRD PARTY DAM 366	19,133.46
REP THRD PARTY DAM 416	(3,122.69)
REP THRD PARTY DAM 426	14,526.90
REP THRD PARTY DAM 766	(3,762.72)
RES INVEST TROUBLE 236	324.20
RES INVEST TROUBLE 256	458.03
STREET LIGHTING 336	(7,141.80)
MINOR STORM EVENT DANVILLE	752.60
MINOR STORM EVENTS EARLINGTON	72,474.77
MINOR STORM EVENT ELIZABETHTOWN	37,741.75
KU MAJOR STORM EVENT	856,945.56
MINOR STORM EVENT LONDON	21,208.49
MINOR STORM EVENT MAYSVILLE	16,838.23
MINOR STORM EVENT NORTON	5,346.57
MINOR STORM EVENT PINEVILLE	22,648.32
MINOR STORM EVENT RICHMOND	11,979.65
MINOR STORM EVENT SHELBYVILLE	6,020.83

<u>Description</u>	<u>Amount</u>
SWITCHING TD - 156	8,504.54
SWITCHING T/D 012160	15,476.71
SWITCHING T/D RC416	13,950.42
SWITCHING T/D 766	5,615.44
Sys Enhanc-Exist Cust-Earlngtn	86,907.70
Sys Enhan-Exist Cust-Danville	19,634.03
Sys Enh-New Cust-Richmond	48,178.12
Sys Enh-Exist Cust-Etown	3,348.31
Sys Enhanc-Exist Cust-Shelbyvl	33,266.41
Sys Enhan-Exist Cust-Lex	147,675.74
Sys Enhan-Exist Cust-Maysville	7,514.32
Sys Enhan-Exist Cust-Pineville	28,399.48
Sys Enhan-Exist Cust-London	27,669.79
Sys Enhan-Exist Cust-Norton	12,126.28
TROUBLE ORDER OH - 156	9,363.58
TROUBLE ORDERS UG - RC 011560	1,280.85
TROUBLE ORDERS OH 216	41,084.05
TROUBLE ORDERS UG - 012160	711.94
TROUBLE ORDERS O/H 236	37,238.63
TROUBLE ORDERS U/G 236	2,595.17
TROUBLE ORDERS O/H 246	723,895.76
TROUBLE ORDERS UG 246	1,916.99
TROUBLE ORDERS O/H 256	498,643.30
TROUBLE ORDER U/G 256	35,476.16
TROUBLE ORDERS O/H 315	28,330.04
TROUBLE ORDERS UG	8,613.98
TROUBLE ORDER OH - 366	7,538.16
TROUBLE ORDERS U/G MAYSVILLE	2,227.88
TROUBLE ORDERS O/H 416	3,681.60
TROUBLE ORDER U/G 416	1,101.22
TROUBLE ORDERS OVERHEAD	30,188.07
TROUBLE ORDERS UG RC426	38,890.55
TROUBLE ORDERS O/H 766	108,877.62
TROUBLE ORDERS UG 766	7,948.34
TOOLS AND EQ 156	200,269.82
TOOLS AND EQ 216	93,689.61
TOOLS AND EQ 236	45,706.86
TOOLS AND EQ 246	255,561.39
TOOLS AND EQ 256	225,850.38
TOOLS AND EQ 315	246,154.63
TOOLS AND EQ 366	35,954.88
TOOLS AND EQ 416	32,789.14
TOOLS AND EQ 426	10,919.75
TOOLS AND EQ 766	43,925.18

# KU 107001 CWIP Balance As of October 31, 2009

<b>Description</b>	<u>Amount</u>
TROUBLE ORDERS	597.43
TROUBLE ORDERS 216	340,163.64
TROUBLE ORDERS 236	58.65
TROUBLE ORDERS 308	134,605.09
PURCHASE TRANSFORMERS 156	3,595.90
PURCHASE TRANSFORMERS 216	156.74
PURCHASE TRANSFORMERS 236	612.52
PURCHASE TRANSFORMER 246	5,303.56
PURCHASE TRANSFORMERS 256	2,519.18
PURCHASE TRANSFORMER 315	14,010.09
PURCHASE TRANSFORMERS 366	3,001.07
PURCHASE TRANSFORMERS 416	920.81
	\$ 1,201,108,034.88

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# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 253

Responding Witness: Shannon L. Charnas

- Q-253. Please provide KU adjusted test year depreciation reserve and depreciation expense by FERC account.
- A-253. See attached.

# Kentucky Utilities Company Depreciation Reserve and Expense As of October 31, 2009

Account	 Reserve	Test Year Expense
Electric Distribution		
E360.10-Land Rights	\$ (1,456,822)	
E360.20-Land		
E361.00-Structures and Improvements	(1,646,481)	
E362.00-Station Equipment	(35,863,521)	
E364.00-Poles, Towers, and Fixtures	(126,557,999)	
E365.00-OH Conductors and Devices	(115,204,136)	
E366.00-Underground Conduit	(593,839)	
E367.00-UG Conductors and Devices	(24,920,353)	
E368.00-Line Transformers	(102,184,424)	
E369.00-Services	(60,670,517)	
E370.00-Meters	(29,954,194)	
E371.00-Install on Customer Premise	(16,742,090)	
E373.00-Street Lighting / Signal Sy	(27,445,380)	
E374.05-ARO Cost Elec Dist (L/B)	 (6,539)	
	\$ (543,246,295)	\$ 32,612,846
Electric Hydro Production		
E330.10-Land Rights	\$ (934,908)	
E331.00-Structures and Improvements	(336,834)	
E332.00-Reservoirs, Dams, and Water	(6,539,251)	
E333.00-Water Wheels, Turbines, Gen	(309,643)	
E334.00-Accessory Electric Equipmen	(80,248)	
E335.00-Misc Power Plant Equipment	(158,839)	
E336.00-Roads, Railroads, and Bridg	(49,946)	
E337.07-ARO Cost Hydro Prod (Eqp)	(1,855)	
•	\$ (8,411,524)	\$ 116,639
Electric Intangible Plant		
E301.00-Organization	\$ -	
E302.00-Franchises and Consents	(48,608)	
E303.00-Misc Intangible Plant	(9,482,815)	
E303.10-CCS Software	(1,981,441)	
	\$ (11,512,864)	\$ 5,881,498

# Kentucky Utilities Company Depreciation Reserve and Expense As of October 31, 2009

Account		Reserve	Test Year Expense
Electric Other Production	***************************************		7
E340.10-Land Rights	\$	(88,086)	
E340.20-Land		_	
E341.00-Structures and Improvements		(10,587,438)	
E342.00-Fuel Holders, Producers, Ac		(7,502,246)	
E342.01-AROP Fuel Holders, Prod, Ac		(198,159)	
E343.00-Prime Movers		(89,564,477)	
E344.00-Generators		(22,431,973)	
E345.00-Accessory Electric Equipmen		(9,558,802)	
E345.01-AROP Accessory Electric Equipmen		(2,170,681)	
E346.00-Misc Power Plant Equipment		(1,789,868)	
E347.07-ARO Cost Other Prod (Eqp)		(34,104)	
	_\$	(143,925,834)	\$ 16,898,891
Electric Steam Production E310.20-Land E311.00-Structures and Improvements E311.01-AROP Structures and Improv E312.00-Boiler Plant Equipment E312.01-AROP Boiler Plant Equipment E314.00-Turbogenerator Units E314.01-AROP Turbogenerator Units E315.00-Accessory Electric Equipmen E315.01-AROP Accessory Electric Equipmen E316.00-Misc Power Plant Equip E317.07-ARO Cost Steam (Eqp)	\$	(133,468,299) (306,791) (635,037,565) (20,671,470) (144,772,597) (62,700) (69,324,868) (6,978,922) (14,475,197) (4,860,688) (1,029,959,097)	\$ 64,091,377
	Ψ	(1,027,737,077)	Ψ 04,021,377
Electric Transmission			
E350.10-Land Rights	\$	(15,480,689)	
E350.20-Land		-	
E352.10-Struct & Imp-Non Sys Contro		(4,388,653)	
E352.20-Struct & Imp-Sys Control/Co		(847,423)	
E353.10-Station Equipment - Non Sys		(59,807,573)	
E353.11-AROP Station Equip Non Sys		10,199	
E353.20-Station Equip-Sys Control		(17,959,579)	
E354.00-Towers and Fixtures		(47,276,827)	

# Kentucky Utilities Company Depreciation Reserve and Expense As of October 31, 2009

		T.	Test Year
Account	***************************************	Reserve	 Expense
E355.00-Poles and Fixtures		(68,472,806)	
E356.00-OH Conductors and Devices		(107,270,764)	
E357.00-Underground Conduit		(162,138)	
E358.00-UG Conductors and Devices		(892,415)	
E359.15-ARO Cost Transm (L/B)		(2,635)	
E359.17-ARO Cost Transm (Eqp)	****************		 
		(322,551,303)	 10,884,413
Electric General Plant			
E389.20-Land	\$	-	
E390.10-Structures and Improvements		(8,757,657)	
E390.20-Improvements to Leased Property		(395,499)	
E391.10-Office Equipment		(3,490,982)	
E391.20-Non PC Computer Equipment		(4,154,132)	
E391.30-Cash Processing Equipment		(372,606)	
E391.31-Personal Computers		(3,445,109)	
E392.00-Transportation Equipment		(18,615,528)	
E393.00-Stores Equipment		(348,458)	
E394.00-Tools, Shop, and Garage Equ		(2,010,133)	
E395.00-Laboratory Equipment		(2,420,376)	
E396.00-Power Operated Equipment		(133,043)	
E397.00-Communication Equipment		(7,575,906)	
E398.00-Miscellaneous Equipment		(336,881)	
• •	\$	(52,056,310)	\$ 5,193,100
Total Plant in Service	\$	(2,111,663,227)	\$ 135,678,764

	•		
•			

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 254

Responding Witnesses: Valerie L. Scott

- Q-254. Please provide all KU calculated, actual, or estimated test year uncollectible expense by customer class.
- A-254. This information is not available. The Company does not maintain uncollectible expense by customer class.

Please see the Company's response to KPSC-1 Question No. 35 for additional information.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 255

Responding Witness: Butch Cockerill

- Q-255. Please provide actual and estimated KU meter reads by class during the test year, and/or the most recent 12 months available.
- A-255. See below for the period November 1, 2008 October 31, 2009.

Rate Schedule	Number of Actual Reads	Number of Estimated Reads
All Electric Schools	2,134	31
Company Use	4,959	204
General Service	590,393	10,364
Industrial Service	12	12
Informational Meter	507	26
Large Time Of Day	448	75
Mine Power	2	0
Muni	228	222
Net Metering Service - Commercial General		
Service	27	1
Net Metering Service - Residential	50	1
Power Service	62,780	692
Residential Service	5,689,123	198,634
Retail Transmission Service	270	94
Temp Suspension - Commercial	46	2
Temp Suspension - Residential	16	3
Time Of Day	635	9
Traffic EnergyE	5	0
Volunteer Fire Department	244	0
Total	6,351,879	210,370

### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 256

**Responding Witness: Butch Cockerill** 

- Q-256. Please provide the following by month for the period April 2006 through the most recent month available by rate schedule for KU:
  - (a) customers billed; and,
  - (b) billed KWH (as applicable).

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-256. (a), (b) See attached. Also see attached CD, in folder titled Question No. 256 for the Microsoft Excel version of the attachment.

# Case No. 2009-00548 Customer and kWh by Rate Category

	Aug-06	kWh	334,299,606	264,940,888	152,207,380	3,330,258	,	9,517,764	367,762,117	150,277,521	2,124,340	235,262,421	73,008,063		1,524,400	18,657,464	9,361,000	10,308,328	5,112,000	16,506,000							1	32,927,940	
	Aug	Customers	222,895	184,655	75,668	92		303	9,684	359	2	36	9	•	2	51	14	30	2	5									
	Jul-06	kWh	292,677,384	241,217,503	141,725,192	3,275,785		7,988,726	354,872,467	147,322,264	2,058,311	239,522,876	67,665,381	•	1,361,600	18,105,252	8,069,000	9,187,869	4,896,000	14,334,000							,	32,327,820	
	Jul	Customers	223,411	184,834	75,496	11		303	9,802	355	2	36	9	•	2	51	11	30	2	9								-	
	90-	kWh	225,242,301	205,163,724	126,394,111	3,756,408		8,146,273	334,253,344	147,839,258	1,942,191	228,869,933	73,361,607	•	1,421,600	16,564,460	9,043,000	12,047,517	5,378,400	14,886,000								39,549,820	
T W W T	90-unf	Customers	223,619	184,392	75,320	77		303	9,852	361	2	36	9	•	2	51	12	28	2	4								-	
Castomici and Marin by Marc	May-06	kWh	169,696,662	175,567,541	111,426,457	3,361,725		8,901,688	309,146,546	140,020,785	1,924,581	202,545,578	62,874,960	ŧ	1,502,400	15,448,460	9,647,000	13,164,774	4,802,400	16,146,000							20,485,158	26,423,300	
,	Ma	Customers	223,641	184,287	75,072	78		303	9,924	354	2	36	9	•	2	51	12	29	2	5								-	
	90-	kWh	187,635,524	244,086,542	115,692,051	3,500,419		9,688,617	295,192,700	131,160,558	1,544,008	199,886,108	64,654,051	ı	1,294,800	14,430,544	9,742,000	11,974,349	5,875,200	17,760,000							20,959,305	32,196,680	
	Apr-06	Customers	223.261	183,456	74.868	78		303	9,983	351	2	36	9		2	51	12	29	2	5							_		
		Rate Schedule	RS	FERS	GSS	GSP	GS	AES	LPS	LPP	LPT	LCIP	LCIT	STOD-T	STODP	STODS	MPT	MPP	LMPP	LMPT	PSS	PSP	TODS	TODP	LTOD	RTS	Spec Contract	LITOD IS	

		kWh	252,219,330	355,484,664	144,861,693	4,414,151	11 510 385	097,610,11	302,531,032	137,625,312	2,010,034	217,368,192	67,938,710		1,373,600	15,320,676	6,138,000	11,059,900	9,473,771	22,674,000							000 607	27,432,000	
	Jan-07	Customers	223,456	187,384	76,438	73	toc	307	9,456	354	2	37	9		2	51	11	33	4	7							•	<b></b> 4	
	90-	kWh	230,573,076	325,069,824	134,272,184	4,368,515		11,121,400	295,778,302	133,512,342	2,244,408	212,740,904	6,856,477		1,452,400	14,744,816	7,613,000	11,453,400	8,653,697	21,888,000								42,009,840	
•	Dec-06	Customers	223,456	187,384	76,437	92		307	9,454	360	2	37	9	•	2	51	12	30	3	9							,		
	90	kWh	190,566,401	241,252,587	119,106,884	4,302,472		9,260,569	286,021,859	131,711,715	1,695,102	216,472,364	66,188,039	•	1,546,800	14,389,360	7,977,000	10,890,400	7,833,338	19,872,000								34,272,720	
	90-voN	Customers	222,775	186,124	76,412	11		303	9,484	344	2	37	9	•	2	51	12	29	3	9								-	
	90	kWh	177.579,094	179,602,477	118,312,053	3,764,952		8,977,184	308,383,789	136,786,516	1,832,039	236,971,024	69,400,201	•	1,329,200	15,613,404	9,020,000	9,806,100	7,523,035	16,080,000								31,610,586	
)	Oct-06	Customers	223.119	185 932	76.089	92		297	9,612	357	2	38	9	,	2	51	13	30	3	ν.								guant	
	90	kWh	260.977.015	219,77,522	140 460 309	3,312,700		10,718,229	349,562,046	154,852,461	2,310,513	233,687,638	81,659,143	•	1.416.800	17.453.184	8.891.000	8,562,972	9,446,292	16,632,000								32,337,720	
	Sen-06	Customers	223,251	185 579	75,501	75		303	9.542	357	2	35	, <sub>1</sub> 0	•	2	. 12		28	4	۰ ۳۰								<del></del>	
		Pate Schedule	Nate Sealedule	FEDS	CSS	GSP	GS .	AES	SdT	I.PP	I PT	I CIP	LCIT	STOD-T	STODE	STODS	MPT	Mpp	I Mpp	LMPT	PSS	PSP	TODS	TODP	LTOD	RTS	Spec Contract	LITOD	2

			,834	,749	669'	,356	,	,150	,612	,184	,017	,419	,853		,000	899,	000,	,400	,391	000,							0	,320
	Jun-07	kWh	252,020,834	221,372,749	145,342,699	3,660,356	,	8,997,150	334,699,612	145,269,184	2,334,017	239,746,419	72,265,853		1,286,000	16,523,668	4,836,000	8,546,400	8,945,391	21,900,000							1	35,212,320
	Jul	Customers	222,464	188,869	77,627	72		307	9,139	353	2	38	9	•	2	50	10	29	4	7							•	-
	May-07	kWh	187,598,960	200,867,313	126,294,710	3,755,381		9,800,183	302,231,697	135,355,200	1,868,457	229,691,867	74,780,677	•	1,443,600	15,050,828	5,069,000	8,909,700	8,215,464	21,318,000								42,653,520
egory	Ma	Customers	222,820	188,756	77,346	74		307	9,187	354	2	38	9	ı	2	51	10	29	4	7							,	<del>pond</del>
Customer and kwn by Kale Calegory	Apr-07	kWh	189,477,381	242,359,297	128,190,006	4,041,195		9,940,876	296,409,614	138,572,955	1,982,443	225,836,184	70,004,387	•	1,229,200	14,624,104	5,815,000	9,677,300	9,772,128	22,722,000								36,274,981
na kwn L	Ap	Customers	222,987	188,560	77,203	74		307	9,233	352	2	37	9	1	2	51	12	30	4	7								
ustomer al	Mar-07	kWh	232,352,685	367,217,251	144,526,711	4,347,530		12,005,850	289,426,095	135,614,605	2,288,193	204,187,894	68,120,828	•	1,202,000	13,632,736	6,173,000	10,644,100	9,388,696	22,362,000								35,050,660
J	Maı	Customers	223,456	187,384	76,434	74		307	9,459	350	2	37	9	•	2	51	11	30	4	7								-
	Feb-07	kWh	273,014,866	477,044,070	161,338,485	4,318,993		13,382,394	304,925,528	135,854,553	1,880,586	213,040,782	71,367,398	•	1,228,000	13,963,636	6,505,000	10,529,300	8,744,334	24,210,000								36,084,960
	Fel	Customers	223,456	187,384	76,439	75		307	9,456	349	2	37	9	i	2	51	Ξ	32	4	7								-
		Rate Schedule	RS	FERS	GSS	GSP	GS	AES	LPS	LPP	LPT	LCIP	LCIT	STOD-T	STODP	STODS	MPT	MPP	LMPP	LMPT	PSS	PSP	TODS	TODP	LTOD	RTS	Spec Contract	LITOD IS

Dec-07	kWh 232,256,454	324,686,477	144,172,365	3,962,692		11,838,410	288,626,816	124,998,334	2,331,134	217,725,928	65,897,549	r	1,294,400	14,857,548	5,246,000	9,444,848	7,088,400	22,932,000							076 070 36	33,009,700
De	Customers 222,476	191,416	78,860	73		297	8,847	346	2	39	7	•	2	51	10	28	33	7							-	-
Nov-07	kWh 184.515.713	215,145,105	126,656,815	3,665,209		9,617,758	284,695,027	128,082,711	2,022,306	203,950,564	67,467,069	•	1,225,600	14,860,936	5,258,000	9,052,065	6,895,747	22,428,000							007 007 00	29,300,400
ž	Customers 222.351	190,683	78,242	73		297	8,876	350	2	38	7	•	2	51	10	36	4	7							-	<b>-</b>
Oct-07	kWh 226 505 939	202,383,964	143,490,990	1,544,391		10,565,057	326,477,918	140,717,147	2,075,270	247,074,231	60,401,248	•	1,320,400	16,193,876	6,528,000	7,998,000	6,883,733	22,296,000							000 400 51	13,904,080
0	Customers	190,357	78,349	73		297	8,954	350	2	40	9		2	51	Ξ	30	4	7							-	<b></b>
Sep-07	kWh 340 221 267	276,230,261	176,914,606	4,292,360		12,746,506	378,286,004	152,516,420	2,671,374	254,564,868	34,385,915	•	1,365,600	18,681,000	6,689,000	8,529,800	6,584,280	21,750,000							100 00	705'/60'77
Se	Customers	189.890	78,031	74		307	8,971	350	2	38	9	•	2	51	10	30	4	7							•	<b>-</b>
Aug-07	kWh	269.619.054	167,413,963	2,756,501		9,902,948	358,872,238	14,612,477	2,226,730	244,930,039	67,743,779	•	1,322,800	18,388,860	6,252,000	8,123,500	6,467,040	21,534,000							t	26,797,017
A	Customers	189.862	77,765	73		307	9,028	351	2	40	9		2	52	10	27	4	7							•	<b></b>
Jul-07	kWh	249,141,019	158,821,285	3,059,073		8,265,499	346,130,456	146,744,417	1,948,131	240,337,937	71,315,490	•	1,238,400	17,649,132	4,497,000	6,841,400	6,323,864	18,456,000							6	33,598,800
Ju	Customers	189 773	77.851	72		307	9,052	352	2	37	9	•	2	52	10	30	4	7							•	-
	Rate Schedule Customers	KS FFRS	GSS	GSP	CS	AES	LPS	LPP	LPT	LCIP	LCIT	STOD-T	STODP	STODS	MPT	MPP	LMPP	LMPT	PSS	rsr TODS	TODP	1707	LIOD	KIS	Spec Contract	LITOD

		kWh	222,026,457	207,864,597	144,100,429	3,716,079		8,912,615	314,088,018	131,205,829	1,838,519	228,262,702	71,035,478	•	1,284,400	6,011,580	7,891,000	8,843,764	7,277,400	0,242,000							•	36,642,240	
00	Jun-08	¥	222,0	207,8	144,1	3,7		8,0	314,0	131,2	 	228,2	71,0		1,2	16,0	7,8	8,	7,2	10,2								36,6	
į	מר	Customers	221,517	192,017	79,024	73		304	8,614	349		39	9	•	2	51	13	31	3	4							•	-	
90	May-08	kWh	162,276,370	182,675,548	125,451,341	3,767,714		9,035,484	282,550,398	126,160,711	2,225,886	218,682,284	72,525,521	•	1,098,000	14,325,356	7,011,000	8,368,591	7,214,400	22,098,000							•	36,296,640	
	Ä	Customers	221,849	191,904	78,903	73		303	8,660	351	7	40	7		2	51	=	29	3	9							•	_	
•	Apr-08	kWh	192,896,736	255,845,974	136,705,001	4,160,387		10,274,632	281,705,408	122,028,944	2,018,077	217,595,126	78,507,238	•	1,395,600	14,120,360	6,467,000	10,029,241	7,957,800	22,260,000							•	42,206,400	
•	Ϋ́	Customers	221,917	191,729	78,790	72		306	8,673	349	2	40	∞	•	2	51	10	31	3	9							1	_	
(	Mar-08	kWh	238,968,548	378,553,892	155,498,595	4,187,697		12,588,858	287,245,494	123,450,944	2,130,763	220,571,823	71,079,720	1	1,171,600	13,503,444	6,579,000	9,960,371	7,496,400	21,900,000								36,402,480	
,	Ÿ	Customers	222,406	192,132	79,308	72		307	8,707	347	2	40	7	•	7	51	12	29	33	9									
	Feb-08	kWh	263,039,602	433,206,409	166,206,329	4,188,553		13,539,936	297,193,448	126,753,626	2,480,208	211,834,983	72,327,981	•	1,240,800	13,647,588	6,191,000	11,172,913	7,101,600	24,156,000								35,955,360	
	F	Customers	222,492	192,172	79,164	72		307	8,778	347	7	38	7	1	2	51	10	31	3	7									
	Jan-08	kWh	286,368,385	438,781,437	172,093,753	4,488,084		13,794,988	310,845,165	132,829,029	1,993,799	219,266,524	75,485,858	ı	1,544,400	15,827,044	5,466,000	11,348,441	7,193,400	27,336,000								33,538,320	
	Ja	Customers	223,382	192,672	79,229	72		307	8,833	353	2	40	7		7	51	10	34	3	7								_	
		Rate Schedule Customers	RS	FERS	GSS	GSP	GS	AES	LPS	LPP	LPT	LCIP	LCIT	STOD-T	STODP	STODS	MPT	MPP	LMPP	LMPT	PSS	PSP	TODS	TODP	LTOD	RTS	Spec Contract	LITOD	SI

		kWh	264,137,746	396,931,460	165,029,290	(4,031,984)		13,233,616	284,338,913	126,801,986	2,462,840	206,556,432	52,181,414	•	1,307,200	3,631,828	9,039,000	2,560,698	7,417,200	23,790,000							1	17,556,480
	Dec-08	<u> </u>	264,1	396,9	165,0	(4,0		13,2	284,3	126,8	2,4	206,5	52,1		<u>.,</u>	13,6	9,	12,5	7,4	23,7								17,
į	Ď	Customers	221,921	194,369	79,595	69		312	8,386	371	2	42	7	•	7	20	15	31	3	9								
	Nov-08	kWh	180,597,867	220,468,466	129,222,320	3,864,622		10,211,298	265,673,563	114,017,674	1,871,035	199,515,909	60,049,854	•	1,103,200	13,163,196	7,921,000	10,325,125	7,123,800	22,482,000							•	21,455,280
	ž	Customers	220,688	192,696	79,309	72		302	8,431	349	2	38	7	1	7	20	12	30	3	9							•	-
- D	Oct-08	kWh	190,860,965	183,633,770	139,216,734	3,765,225		10,146,962	296,530,427	127,033,429	2,203,677	219,443,677	66,930,205	,	1,281,200	15,175,296	7,998,000	9,684,021	8,041,800	21,756,000							•	25,678,080
	ŏ	Customers	221,344	192,939	79,364	72		306	8,475	352	2	40	7	ı	2	50	12	30	3	9							•	_
	Sep-08	kWh	282,311,969	242,227,328	165,478,393	3,668,440		11,829,402	345,087,620	139,601,750	2,165,175	239,396,625	68,564,571	,	1,170,400	17,571,988	7,507,000	8,438,458	6,968,400	19,992,000							,	24,924,240
	Se	Customers	221,532	192,836	79,193	72		305	8,495	353	2	40	7	•	2	51	12	30	3	9							•	-
	Aug-08	kWh	294,806,104	248,008,969	164,456,548	3,938,127		9,439,858	331,879,667	134,726,380	2,549,349	222,815,665	74,846,267	•	1,281,200	16,199,608	7,636,000	8,044,150	6,958,200	20,562,000							•	39,389,760
	Ψ	Customers	221,294	192,225	79,162	73		303	8,551	349	2	40	7	1	2	44	12	30	3	9								-
	Jul-08	kWh	288,536,348	248,078,341	165,955,921	3,497,774		8,064,173	340,647,412	140,578,138	2,133,332	246,368,157	69,062,204	•	1.324,800	17,282,284	7,161,000	7,434,343	6,381,600	27,750,000							1	29,233,440
	Ju	Customers	222.058	192,859	79,136	73		302	8,591	351	33	42	7	,	7	51	13	31	c	∞							•	
		Rate Schedule Customers	RS	FERS	GSS	GSP	CS	AES	LPS	LPP	LPT	LCIP	LCIT	STOD-T	STODP	STODS	MPT	MPP	LMPP	LMPT	PSS	PSP	TODS	TODP	LTOD	RTS	Spec Contract	LITOD IS

Jun-09	kWh	444,101,873	•	1	•	151,264,219	9,972,612	•	1	•			1	1	•		,	•		546,279,992	134,983,330	19,787,442	8,465,260	220,319,926	101,894,854		1	27,216,000
Ju	Customers	419,860	•			79,242	295	•	•	•	•	•	•	•		•	ı	•		8,283	419	58	25	41	31	ı	•	
May-09	kWh	348,186,931	•	•	•	126,415,840	9,397,190	•	ı	•	•	•	•	•	•	•	•	1	•	259,424,346	114,817,030	13,406,440	5,032,620	192,978,281	97,976,904	•	1	20,952,000
W	Customers	418,159	•	1	•	78,401	282	1	1	1	•	•	•	•			•		•	8,228	414	46	21	41	32	1	•	
Apr-09	kWh	484,457,798	•	•	•	150,580,519	10,253,522	1	•	•	•	•	•	•	•	•	•	•	•	280,424,397	131,633,359	15,393,700	6,382,200	180,879,823	107,355,062	•	1	21,816,000
Ϋ́	Customers	417,971		•	•	76,675	569	1	•	•	•			•	•	•	1			7,903	417	48	22	37	30	,	•	-
Mar-09	kWh	518,877,990	•	1	•	139,521,856	11,086,402	•	ı	•	•	•		•	•	•	•	•	1	237,400,224	112,681,758	11,117,864	4,771,180	173,398,013	91,258,197	1	1	25,751,520
W	Customers	413,714	•	•	•	79,604	304		1	•	,	1		1	٠	ı	ı	•	•	8,291	422	48	•	42	32	•		
Feb-09	kWh	386,811,116	312,230,176	144,646,647	1,845,300	25,889,373	13,243,658	272,214,071	124,764,999	3,050,415	113,552,330	45,934,000		822,400	5,870,964	1,744,000	10,071,135	6,552,000	7,992,000	,	479,999	7,668,588	2,334,600	57,733,641	35,703,739	1	20,329,920	r
Fe	Customers	286,232	138,108	67,226	23	13,293	308	8,579	390	2	27	33		-	18		28	2	33	•	33	35	7	15	18	1	-	•
Jan-09	kWh	298,519,092	462,795,262	175,698,087	3,305,092		13,510,722	285,915,571	104,048,132	2,466,860	173,250,606	61,175,196	•	1,132,400	13,362,960	9,608,000	11,847,802	6,753,000	20,100,000							,	15,955,920	
Ja	Customers	221,377	193,714	78,861	89		298	8,114	323	2	36	7	,	2	45	13	29	3	4							•	_	
	Rate Schedule Customers	RS	FERS	GSS	GSP	GS	AES	LPS	LPP	LPT	LCIP	LCIT	STOD-T	STODP	STODS	MPT	MPP	LMPP	LMPT	PSS	PSP	TODS	TODP	LTOD	RTS	Spec Contract	LITOD	SI

						•	,	•	
	Jr	Jul-09	Au	Aug-09	Se	Sep-09	Ŏ	Oct-09	
Rate Schedule	Ö	kWh	Customers	kWh	Customers	kWh	Customers	kWh	
RS	420,145	517,809,996	420,438	489,242,702	419,746	471,540,111	420,103	375,241,034	
FERS	•	•		1	ı	•	ı	•	
GSS	•		•	•		ı	•	•	
GSP				•	ı	•	•	1	
CS	79,282	162,848,759	79,481	155,041,707	79,637	155,080,617	79,946	136,119,177	
AES	295	9,546,345	291	8,836,234	292	10,863,939	291	10,231,455	
LPS	•			ı	ı	•	•	ı	
LPP	,	•	•	1	1	•	•	•	
LPT	•	•	•	,	1	1	•	•	
LCIP	•	•	,	•	Ì	•	•	•	
LCIT	1	•	•	•	•	•	•	•	
STOD-T	ı	•	•	1	1	1	•	•	
STODP	•		1	1	1	•	•	1	
STODS	•	1	•	•	•	•	•	•	
MPT			•	Ī	1	ı	1	•	
MPP	,	1	•		•	ı	•	ı	
LMPP	•	ı	1	ı	1	•	•	•	
LMPT	1	•	•	ı	1	ı	•	•	
PSS	8,258	68,283,541	8,240	300,252,658	8,224	310,664,013	8,207	278,667,199	
PSP	419	134,863,239	414	129,097,822	415	135,364,699	415	123,439,265	
TODS	09	19,554,908	61	21,569,854	29	21,886,744	89	21,244,224	
TODP	25	7,390,320	25	7,091,380	27	8,723,840	28	9,143,240	
LTOD	42	223,954,647	37	193,964,421	42	252,545,357	43	251,566,047	
RTS	32	108,112,562	32	119,346,147	32	117,150,709	33	177,051,224	
Spec Contract	,	1	1	,	ı	•	•	•	
LITOD	,	•	•		•	1		r	
SI	_	31,752,000	_	40,608,000		42,552,000	<del></del>	46,224,000	

### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# **Question No. 257**

- Q-257. With regard to KU Purchased Power (Account 555) in Seelye Exhibit 19, Page 17, please provide:
  - (a) all workpapers and analyses showing the determination of total demand costs within the Account total of \$177,630,092; and,
  - (b) all workpapers and analyses showing the determination of total energy costs within the Account total of \$177,630,092).
- A-257. (a) The \$177,630,092 figure is functionally assigned on the OMPP vector in the cost of service study. See pages 17 and 49 of Seelye Exhibit 19.
  - (b) The \$177,630,092 figure is functionally assigned on the OMPP vector in the cost of service study. See pages 17 and 49 of Seelye Exhibit 19.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 258

- Q-258. With regard to KU Intercompany Sales of \$37,366,206 (Seelye Exhibit 20, Page 23), please provide:
  - (a) a detailed explanation along with all workpapers and analyses showing the pricing methodology (basis) and amount (units and dollars) for sales to affiliates; and,
  - (b) if not provided in (a) above, please provide the detailed determination of test year Intercompany sales (units and dollars) by month and by affiliate.
- A-258. See attached CD, in the folder titled Question No. 258.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 259

Responding Witness: Robert M. Conroy

- Q-259. Reference each KU rate schedule. Please provide a history of all base rates during the last 10-years. In this response please provide each rate element (e.g., customer charge, energy charge, demand charge, etc.) as well as the effective data of each base rate.
- A-259. A history of all base rate changes since 2000 are on the attached CD in folder titled Question No. 259. The attached documents contain the original and any revised tariff sheets for Electric Service contained in KU's Tariff Books P.S.C. No. 12, P.S.C. No. 13, and P.S.C. No. 14.

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# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 260

Responding Witness: Robert M. Conroy / William Steven Seelye

- Q-260. Please provide a table or matrix comparing each rate class in this filing with the rate classes shown in KU's last cost of service study in Docket No. 2008-00251. In this response please explain any consolidations and migrations.
- A-260. Please see the testimony of Robert M. Conroy and William Steven Seelye for the changes in rate schedules proposed in this proceeding and those in effect following the Commission's order in Case No. 2008-00251. In addition, please see the side-by-side tariff comparison contained behind Tab 8 in Volume 1 of KU's Application. A comparison of the current and proposed rates can also be found in Exhibit 7 of Mr. Seelye's testimony.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 261

- Q-261. With regard to KU Seelye's direct testimony at Page 49, Lines 20 and 21, Exhibit 11, please provide all detailed SAS output reports including diagnostic statistics, confidence intervals, number of observations, coefficients, etc. regarding the statistical modeling developed in this case.
- A-261. The requested output reports can be found on the attached CD with these responses, in a folder titled Question No. 261.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 262** 

- Q-262. With regard to KU Seelye Exhibit 13, please explain what timing and size metrics the coefficients measure in terms of usage. In other words, do the coefficients relate to daily or monthly usage, sample size, or total class usage? If sample size, please explain in detail and provide all workpapers, analyses, and spreadsheets used to adjust from sample to population amounts.
- A-262. The coefficients relate to total class daily usage.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 263

- Q-263. Please provide all weather related data for all weather stations in KU's (or its Kentucky affiliates) possession (whether utilized or not in this case) in electronic format. Please provide in Microsoft Excel format if available. If not available in Excel format, please provide in ASCII, common delineated or fixed field format with all fields labeled or identified. In this response, include all weather stations for which data is available, all periods in which data in available, and all weather characteristics available (e.g., HDD, CDD, Max Temp, Min Temp, etc.).
- A-263. See attached CD in folder titled Question No. 263.

# CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

# Question No. 264

- Q-264. Please identify the weather station(s) utilized by Mr. Seelye to conduct his KU weather normalization analyses.
- A-264. Mr. Seelye utilized Bluegrass Field (LEX) weather station.

### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 265

- Q-265. With regard to Seelye KU Exhibit 13, please provide all input data (as selected) for each model in electronic format. Please provide in Microsoft Excel format if available. If Excel format is not available, please provide in ASCII common delineated or field format with all fields labeled or identified.
- A-265. See attached CD in the folder titled Question No. 265.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

#### **Ouestion No. 266**

Responding Witness: William Steven Seelye

## Q-266. With regard to Seelye KU Exhibit 13:

- (a) please provide the Exhibit in executable Excel format (include all linked files); and,
- (b) using Class 1 (Residential), month 7 (2009) as an example, please explain in detail how the "CDD65" value of 56971.3 was obtained as well as how the "R-sq." value of 0.872 was obtained. In this response, please also explain how the load data sample was applied to the entire class (population).
- A-266. (a) See response to KPSC-2 Question No. 77.
  - (b) The value of 56971.3 was obtained from an ordinary least squares regression model. The load data for the entire population (either stratified from a sample or developed from census data) was used to derive the coefficients and to calculate the normalization adjustment.

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#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

**Question No. 267** 

- Q-267. With regard to Seelye KU Exhibit 14:
  - (a) please provide the Exhibit in executable Excel format (include all linked files); and,
  - (b) using Class 1 (Residential), month 7 (2009) as an example, please explain in detail how the "Adjustment (MWH)" value of 39880 was obtained. In this response, please verify that the first column labeled "Adjustment (MWH)" relates to an HDD65 analysis and that the last column labeled "Adjustment (MWH)" relates to a CDD65 analysis. If this is not the case, please provide a detailed explanation of what each column represents.
- A-267. (a) See response to KPSC-2 Question No. 77.
  - (b) The value of 39880 was obtained by multiplying the regression coefficient by the departure from the bandwidth boundary.

#### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 268

- Q-268. With regard to Mr. Seelye's KU direct testimony Page 49, Line 12 though Line 17, please explain in detail whether Mr. Seelye utilized the entire sample load research data available, or a subset of all sampled load research data observations (customer) in conducting his weather normalization regression analyses. If a subset of the total sampled load research data was utilized, please explain and provide all analyses showing how the selected sample reasonably reflects the usage characteristics of the class.
- A-268. The entire sample load research data was utilized.

### CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 269

- Q-269. With regard to Mr. Seelye's KU direct testimony at Page 49, Line 15 through Line 17 70, Line 2, please provide in executable electronic format the "accurate load research data for all of the rate classes . . . [which] . . . meet the accuracy requirements that were set forth in Section 133 of the Public Utilities Regulatory Policy Act (PURPA)" referenced therein.
- A-269. See responses to Question No. 229 and Question No. 265.

## CASE NO. 2009-00548

# Response to Attorney General's Initial Requests for Information Dated March 1, 2010

## Question No. 270

- Q-270. With regard to Mr. Seelye's KU direct testimony, Seelye Exhibit 5, please provide the following:
  - (a) a copy in executable Excel format (include all linked files),
  - (b) all the workpapers spreadsheets, source documents, etc. that support the amounts, assumptions and calculations incorporated therein; and,
  - (c) an explanation of what is represented therein and how these determinations are specifically used by KU, since there is no discussion in the text of the testimony regarding this Exhibit.
- A-270. (a)-(b) See response to KPSC-2 Question No. 77.
  - (c) The detailed information provided in response to KPSC-2 Question No. 77 includes descriptive labels.