



Mr. Jeff DeRouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

RECEIVED

MAR 15 2010

PUBLIC SERVICE  
COMMISSION

**Kentucky Utilities Company**  
State Regulation and Rates  
220 West Main Street  
PO Box 32010  
Louisville, Kentucky 40232  
www.eon-us.com

Lonnie E. Bellar  
Vice President  
T 502-627-4830  
F 502-217-2109  
lonnie.bellar@eon-us.com

March 15, 2010

**RE: *Application of Kentucky Utilities Company for an Adjustment of Its Base Rates – Case No. 2009-00548***

Dear Mr. DeRouen:

Please find enclosed and accept for filing the original and ten (10) copies of the Response of Kentucky Utilities Company to the First Set of Data Requests of Kentucky Industrial Utility Customers, Inc. dated March 1, 2010, in the above-referenced matter.

Also enclosed are an original and ten (10) copies of a Petition for Confidential Protection regarding certain information contained in the enclosed responses.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,

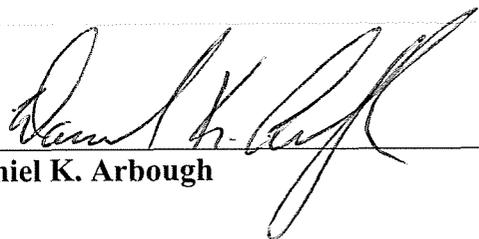
Lonnie E. Bellar

cc: Parties of Record

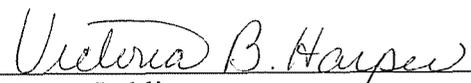
VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Daniel K. Arbough**, being duly sworn, deposes and says that he is Treasurer for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
Daniel K. Arbough

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of March 2010.

  
Victoria B. Harper (SEAL)  
Notary Public

My Commission Expires:

Sept 20, 2010

VERIFICATION

STATE OF TEXAS )  
 ) SS:  
COUNTY OF TRAVIS )

The undersigned, **William E. Avera**, being duly sworn, deposes and says he is President of FINCAP, Inc., that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

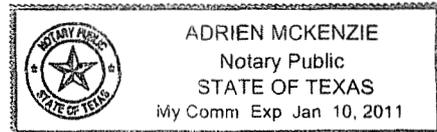
*William E. Avera*  
William E. Avera

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 10<sup>th</sup> day of March 2010.

*[Signature]* (SEAL)  
Notary Public

My Commission Expires:

1/10/2011



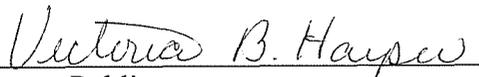
VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
**Lonnie E. Bellar**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of March 2010.

 (SEAL)  
\_\_\_\_\_  
Notary Public

My Commission Expires:

Sept 20, 2010

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Shannon L. Charnas**, being duly sworn, deposes and says that she is Director – Utility Accounting and Reporting for E.ON U.S. Services, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Shannon L. Charnas  
**Shannon L. Charnas**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of March 2010.

Victoria B. Haysen (SEAL)  
Notary Public

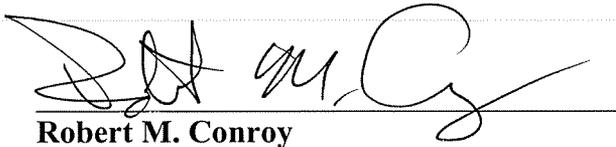
My Commission Expires:

Sept 20, 2010

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Director - Rates for E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of March 2010.

  
Notary Public (SEAL)

My Commission Expires:

Sept 20, 2010

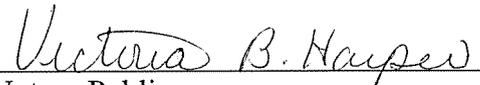
VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Chris Hermann**, being duly sworn, deposes and says that he is Senior Vice President, Energy Delivery for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
Chris Hermann

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of March 2010.

 (SEAL)  
\_\_\_\_\_  
Notary Public

My Commission Expires:

Sept 20, 2010







VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Valerie L. Scott**, being duly sworn, deposes and says that she is Controller for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Valerie L. Scott  
**Valerie L. Scott**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of March 2010.

Victoria B. Hayes (SEAL)  
Notary Public

My Commission Expires:

Sept 20, 2010



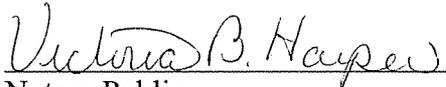
VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **Paul W. Thompson**, being duly sworn, deposes and says that he is Senior Vice President, Energy Services for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
**Paul W. Thompson**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12<sup>th</sup> day of March 2010.

 (SEAL)  
\_\_\_\_\_  
Notary Public

My Commission Expires:

Sept 20, 2010

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

**In the Matter of:**

**APPLICATION OF KENTUCKY UTILITIES )    CASE NO.**  
**COMPANY FOR AN ADJUSTMENT OF )    2009-00548**  
**ITS BASE RATES )**

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**RESPONSE OF**  
**KENTUCKY UTILITIES COMPANY**  
**TO THE**  
**FIRST SET OF DATA REQUESTS OF**  
**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**  
**DATED MARCH 1, 2010**

**FILED: March 15, 2010**



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 1**

**Responding Witness: Lonnie E. Bellar/William Steven Seelye/Counsel**

- Q-1. Referring to the proposed Curtailable Service Rider CSR:
- a. Please provide all workpapers, studies, analyses, and documents supporting and/or underlying the development of the proposed rider.
  - b. Provide all studies and/or analyses that KU conducted concerning expected customer acceptance of and willingness to receive service under the proposed rider.
  - c. Identify and provide all documents provided to and correspondence with existing and potential interruptible customers related to the development, implementation, and operation of the proposed CSR rider.
  - d. Identify and provide all alternatives to Rider CSR as proposed that KU considered but rejected.
- A-1.
- a. No studies were performed. The new CSR is the result of internal discussion to simplify the process for all existing participating industrials. Please see the response to AG-1 Question No. 239.
  - b. See response to (a.) above.
  - c. See the response to KPSC-2 Question No. 86.
  - d. All decisions regarding which adjustments to include in the application in this proceeding were made in consultation with legal counsel. Any response to this question necessarily requires the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 2**

**Responding Witness: Robert M. Conroy**

- Q-2. Referring to existing Riders CSR1, CSR2, and CSR3:
- a. For each customer (identified only by reference number) served under one of these riders, identify the applicable rider and the total MW of curtailable/interruptible load under contract.
  - b. State the number of months in which each customer in subpart (a) above has been continuously served under the existing rider or its predecessor.
  - c. For each customer identified in the subpart (a) above, provide the customer's firm contract demand.
- A-2.
- a. Please see the response to AG-1 Question No. 236, AG-1 Question No. 237 and AG-1 Question No. 238.
  - b. The customer (reference number 4) served under CSR1 has been a customer under that rider since April 1996. The customer (reference number 3) served under CSR3 has been a customer under that rider since July 2002.
  - c. See response to (a.) above.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 3**

**Responding Witness: Lonnie E. Bellar/William Steven Seelye**

- Q-3. Referring to existing Riders CSR1, CSR2, and CSR3:
- a. For each customer (identified only by reference number) served under one of these riders, identify the date, time, and duration of each curtailment called by KU in the past 60 months?
  - b. For each curtailment referenced in the response to subpart (a) above, specify whether the curtailment was an emergency or a buy-through event, identify the MW of load curtailment requested, and identify the MW of load that failed to comply with the curtailment request.
  - c. For each buy-through curtailment identified in the response to subpart (b) above, specify whether the customer bought through the curtailment, the amount of buy-through energy purchased, the price paid for such buy-through energy, and the source (system supply or market) of the buy-through price.
- A-3.
- a. See attachment for details of curtailments for the past 5 years for both LG&E and KU.
  - b. "Emergency" does not apply to the CSRs. See attached. There were no failures to comply during the test year.
  - c. See attached. It is the operation practice to use the market as the source of buy through pricing.

Kentucky Utilities Company  
Case No. 2009-00548  
Detailed Curtailment Data

Reference #	Start Date/Time	Offer Price	KW Hrs Purchased	Offer Accepted	Hours	Curtailment or Buy-through	Amount Requested	Non-Compliance Amount (MW)
1	1/8/2005 9:45 AM	N/A		N/A	2 75	Curtailment	Contracted amount	
1	1/10/2005 7:00 AM	N/A		N/A	3 00	Curtailment	Contracted amount	
1	1/11/2005 7:30 AM	N/A		N/A	1 50	Curtailment	Contracted amount	
1	1/14/2005 7:30 AM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	1/14/2005 7:30 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
2	1/14/2005 8:00 AM	65 00	20,000 00	YES	3 00	Buy-through	Contracted amount	
2	1/14/2005 11:00 AM	55 00	20,000 00	YES	3 00	Buy-through	Contracted amount	
1	1/17/2005 8:00 AM	N/A		N/A	0 83	Curtailment	Contracted amount	
4	1/17/2005 9:00 AM	95 00	3,600 00	YES	2 00	Buy-through	Contracted amount	
4	1/17/2005 11:00 AM	85 00	3,600 00	YES	2 00	Buy-through	Contracted amount	
4	1/17/2005 1:00 PM	75 00	3,600 00	YES	4 00	Buy-through	Contracted amount	
4	1/18/2005 9:00 AM	95 00	3,600 00	YES	2 00	Buy-through	Contracted amount	
4	1/18/2005 11:00 AM	75 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
4	1/18/2005 12:00 PM	70 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
4	1/18/2005 1:00 PM	60 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
1	1/19/2005 12:15 PM	N/A		N/A	1 33	Curtailment	Contracted amount	
3	1/19/2005 12:20 PM	N/A		N/A	2 17	Curtailment	Contracted amount	
1	1/20/2005 7:35 AM	N/A		N/A	1 42	Curtailment	Contracted amount	
4	1/20/2005 9:00 AM	75 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
4	1/20/2005 10:00 AM	60 00	3,600 00	YES	2 00	Buy-through	Contracted amount	
1	1/21/2005 7:30 AM	N/A		N/A	1 33	Curtailment	Contracted amount	
1	1/22/2005 11:05 AM	N/A		N/A	1 08	Curtailment	Contracted amount	
1	1/22/2005 6:30 PM	N/A		N/A	4 33	Curtailment	Contracted amount	
1	1/23/2005 6:53 PM	N/A		N/A	3 95	Curtailment	Contracted amount	
4	1/24/2005 9:00 AM	100 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
4	1/24/2005 10:00 AM	80 00	3,600 00	YES	3 00	Buy-through	Contracted amount	
4	1/24/2005 1:00 PM	60 00	3,600 00	YES	2 00	Buy-through	Contracted amount	
4	1/27/2005 9:00 AM	75 00	3,600 00	YES	2 00	Buy-through	Contracted amount	
4	1/27/2005 11:00 AM	55 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
3	1/27/2005 6:41 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
1	1/27/2005 6:50 PM	N/A		N/A	0 50	Curtailment	Contracted amount	
1	1/28/2005 7:13 AM	125 00	0 00	NO	4 45	Buy-through	Contracted amount	
3	1/28/2005 8:06 AM	N/A		N/A	3 23	Curtailment	Contracted amount	
3	1/28/2005 3:20 PM	N/A		N/A	0 67	Curtailment	Contracted amount	
1	2/2/2005 7:15 AM	N/A		N/A	2 00	Curtailment	Contracted amount	
2	2/10/2005 7:30 AM	75 00	20,000 00	YES	1 50	Buy-through	Contracted amount	
2	2/10/2005 9:00 AM	70 00	20,000 00	YES	1 00	Buy-through	Contracted amount	
4	2/10/2005 9:00 AM	70 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
2	2/10/2005 10:00 AM	55 00	20,000 00	YES	3 00	Buy-through	Contracted amount	
4	2/10/2005 10:00 AM	55 00	3,600 00	YES	3 00	Buy-through	Contracted amount	
3	2/10/2005 10:30 AM	N/A		N/A	3 53	Curtailment	Contracted amount	
1	2/10/2005 10:35 AM	N/A		N/A	1 42	Curtailment	Contracted amount	
1	2/10/2005 12:00 PM	55 00	30,000 00	YES	1 00	Buy-through	Contracted amount	
2	2/11/2005 8:00 AM	69 00	21,000 00	YES	2 00	Buy-through	Contracted amount	
4	2/11/2005 9:00 AM	69 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
3	2/14/2005 9:35 AM	N/A		N/A	5 08	Curtailment	Contracted amount	
1	2/15/2005 7:30 PM	55 00	30,000 00	YES	1 50	Buy-through	Contracted amount	
3	2/17/2005 6:30 PM	N/A		N/A	4 25	Curtailment	Contracted amount	
1	2/17/2005 7:15 PM	75 00	30,000 00	YES	3 00	Buy-through	Contracted amount	
2	2/18/2005 7:00 AM	80 00	19,000 00	YES	4 00	Buy-through	Contracted amount	
1	2/18/2005 8:00 AM	N/A		N/A	3 17	Curtailment	Contracted amount	
3	2/18/2005 8:00 AM	N/A		N/A	2 25	Curtailment	Contracted amount	
4	2/18/2005 9:00 AM	80 00	3,600 00	YES	2 00	Buy-through	Contracted amount	
3	2/18/2005 7:30 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	2/21/2005 11:00 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
1	2/23/2005 8:00 AM	55 00	30,000 00	YES	2 00	Buy-through	Contracted amount	
2	2/23/2005 8:00 AM	55 00	20,000 00	YES	2 00	Buy-through	Contracted amount	
4	2/23/2005 9:00 AM	55 00	3,600 00	YES	1 25	Buy-through	Contracted amount	
2	2/24/2005 7:00 AM	70 00	20,000 00	YES	7 00	Buy-through	Contracted amount	
1	2/24/2005 7:30 AM	70 00	30,000 00	YES	12 00	Buy-through	Contracted amount	
4	2/24/2005 9:00 AM	70 00	3,600 00	YES	8 00	Buy-through	Contracted amount	
2	2/24/2005 2:00 PM	70 00	19,000 00	YES	6 00	Buy-through	Contracted amount	
2	2/25/2005 7:00 AM	80 00	15,000 00	YES	2 00	Buy-through	Contracted amount	
2	2/25/2005 9:00 AM	60 00	15,000 00	YES	1 00	Buy-through	Contracted amount	
4	2/25/2005 9:00 AM	60 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
2	2/25/2005 10:00 AM	55 00	15,000 00	YES	1 00	Buy-through	Contracted amount	
4	2/25/2005 10:00 AM	55 00	3,600 00	YES	1 00	Buy-through	Contracted amount	
3	2/25/2005 7:21 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
1	3/1/2005 8:00 AM	75 00		NO	2 00	Buy-through	Contracted amount	
2	3/1/2005 8:00 AM	75 00	10,000 00	YES	2 00	Buy-through	Contracted amount	
1	3/2/2005 7:45 AM	80 00		NO	1 25	Buy-through	Contracted amount	
2	3/2/2005 7:45 AM	80 00	19,000 00	YES	1 25	Buy-through	Contracted amount	
3	3/2/2005 7:10 PM	N/A		N/A	1 67	Curtailment	Contracted amount	
3	3/3/2005 8:00 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
2	3/4/2005 7:00 AM	80 00	20,000 00	YES	4 75	Buy-through	Contracted amount	
1	3/4/2005 7:15 AM	80 00		NO	4 50	Buy-through	Contracted amount	

Kentucky Utilities Company  
Case No. 2009-00548  
Detailed Curtailment Data

Reference #	Start Date/Time	Offer Price	KW Hrs Purchased	Offer Accepted	Hours	Curtailment or Buy-through	Amount Requested	Non-Compliance Amount (MW)
4	3/4/2005 9:00 AM	80 00	3,600 00	YES	2 75	Buy-through	Contracted amount	
3	3/4/2005 10:05 AM	N/A		N/A	2 58	Curtailment	Contracted amount	
3	3/8/2005 6:40 PM	N/A		N/A	2 08	Curtailment	Contracted amount	
1	3/9/2005 7:15 AM	80 00		NO	1 75	Buy-through	Contracted amount	
2	3/9/2005 7:15 AM	80 00	21,000 00	YES	1 75	Buy-through	Contracted amount	
2	3/9/2005 9:00 AM	70 00	21,000 00	YES	1 00	Buy-through	Contracted amount	
3	3/9/2005 6:40 PM	N/A		N/A	2 83	Curtailment	Contracted amount	
1	3/10/2005 7:20 AM	85 00		NO	2 17	Buy-through	Contracted amount	
3	3/10/2005 2:55 PM	N/A		N/A	6 00	Curtailment	Contracted amount	
3	3/11/2005 8:55 AM	N/A		N/A	6 08	Curtailment	Contracted amount	
3	3/11/2005 8:01 PM	N/A		N/A	1 73	Curtailment	Contracted amount	
1	3/14/2005 7:15 AM	82 00		NO	3 00	Buy-through	Contracted amount	
2	3/14/2005 7:15 AM	82 00	15,000 00	YES	2 75	Buy-through	Contracted amount	
2	3/14/2005 10:00 AM	60 00	15,000 00	YES	1 00	Buy-through	Contracted amount	
3	3/16/2005 8:10 AM	N/A		N/A	6 42	Curtailment	Contracted amount	
2	3/16/2005 10:30 AM	81 00	13,000 00	YES	5 00	Buy-through	Contracted amount	
4	3/16/2005 10:30 AM	81 00	3,600 00	YES	5 00	Buy-through	Contracted amount	
3	3/16/2005 6:05 PM	N/A		N/A	2 83	Curtailment	Contracted amount	
3	3/17/2005 2:10 PM	N/A		N/A	0 83	Curtailment	Contracted amount	
1	3/18/2005 8:15 AM	81 00		NO	1 25	Buy-through	Contracted amount	
2	3/18/2005 8:15 AM	81 00	20,000 00	YES	1 25	Buy-through	Contracted amount	
1	3/21/2005 7:15 AM	81 00		NO	3 50	Buy-through	Contracted amount	
2	3/21/2005 7:15 AM	81 00	21,000 00	YES	3 50	Buy-through	Contracted amount	
3	3/21/2005 2:30 PM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	3/22/2005 10:40 AM	N/A		N/A	1 42	Curtailment	Contracted amount	
1	3/24/2005 8:00 AM	67 00	30,000 00	YES	2 00	Buy-through	Contracted amount	
2	3/24/2005 8:15 AM	67 00	20,000 00	YES	1 75	Buy-through	Contracted amount	
1	3/24/2005 10:00 AM	55 00	30,000 00	YES	1 00	Buy-through	Contracted amount	
2	3/24/2005 10:00 AM	55 00	20,000 00	YES	1 00	Buy-through	Contracted amount	
3	3/25/2005 8:30 AM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	3/28/2005 7:20 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	3/29/2005 7:20 PM	N/A		N/A	1 97	Curtailment	Contracted amount	
3	3/31/2005 9:45 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
4	6/6/2005 10:00 AM	80 00		NO	6 00	Buy-through	Contracted amount	
2	6/6/2005 11:00 AM	80 00	15,000 00	YES	6 00	Buy-through	Contracted amount	
4	6/10/2005 11:00 AM	133 00		NO	5 00	Buy-through	Contracted amount	
2	6/10/2005 12:00 PM	133 00	10,000 00	YES	6 00	Buy-through	Contracted amount	
2	6/22/2005 12:00 PM	127 00	22,000 00	YES	7 00	Buy-through	Contracted amount	
4	6/22/2005 12:00 PM	127 00	0 00	NO	4 00	Buy-through	Contracted amount	
2	6/23/2005 12:00 PM	127 00	19,500 00	YES	7 00	Buy-through	Contracted amount	
4	6/23/2005 12:00 PM	127 00	0 00	NO	4 00	Buy-through	Contracted amount	
2	6/24/2005 12:00 PM	129 00	21,000 00	YES	7 00	Buy-through	Contracted amount	
4	6/24/2005 12:00 PM	129 00	0 00	NO	4 00	Buy-through	Contracted amount	
1	6/27/2005 11:00 AM	126 00	1,000 00	YES	5 50	Buy-through	Contracted amount	
2	6/27/2005 12:00 PM	126 00	21,000 00	YES	4 50	Buy-through	Contracted amount	
4	6/27/2005 12:00 PM	126 00	3,100 00	YES	4 00	Buy-through	Contracted amount	
3	6/27/2005 2:00 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
1	6/27/2005 4:30 PM	180 00	1,000 00	YES	2 50	Buy-through	Contracted amount	
2	6/27/2005 4:30 PM	180 00	21,000 00	YES	2 50	Buy-through	Contracted amount	
4	6/28/2005 12:00 PM	130 00	3,100 00	YES	4 00	Buy-through	Contracted amount	
1	6/28/2005 1:00 PM	130 00	30,000 00	YES	6 00	Buy-through	Contracted amount	
2	6/28/2005 1:00 PM	130 00	20,000 00	YES	6 00	Buy-through	Contracted amount	
3	6/28/2005 2:45 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
1	6/29/2005 12:00 PM	158 00	28,000 00	YES	6 00	Buy-through	Contracted amount	
2	6/29/2005 12:00 PM	158 00	11,000 00	YES	3 00	Buy-through	Contracted amount	
4	6/29/2005 12:00 PM	158 00	0 00	NO	5 00	Buy-through	Contracted amount	
2	6/29/2005 3:00 PM	158 00	20,000 00	YES	3 00	Buy-through	Contracted amount	
1	6/30/2005 12:00 PM	155 00	0 00	NO	7 00	Buy-through	Contracted amount	
2	6/30/2005 12:00 PM	155 00	21,000 00	YES	7 00	Buy-through	Contracted amount	
4	6/30/2005 12:00 PM	155 00	0 00	NO	5 00	Buy-through	Contracted amount	
3	6/30/2005 2:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
4	7/5/2005 12:00 PM	154 00	0 00	NO	4 00	Buy-through	Contracted amount	
1	7/5/2005 1:00 PM	154 00		NO	5 00	Buy-through	Contracted amount	
2	7/5/2005 1:00 PM	154 00	20,000 00	YES	5 00	Buy-through	Contracted amount	
4	7/6/2005 12:00 PM	154 00	0 00	NO	4 00	Buy-through	Contracted amount	
1	7/6/2005 1:00 PM	154 00	28,000 00	YES	5 00	Buy-through	Contracted amount	
2	7/6/2005 1:00 PM	154 00	21,500 00	YES	5 00	Buy-through	Contracted amount	
4	7/7/2005 1:00 PM	154 00	0 00	NO	3 00	Buy-through	Contracted amount	
1	7/7/2005 2:00 PM	154 00		NO	4 00	Buy-through	Contracted amount	
2	7/7/2005 2:00 PM	154 00	20,500 00	YES	4 00	Buy-through	Contracted amount	
1	7/11/2005 2:00 PM	154 00	0 00	NO	4 00	Buy-through	Contracted amount	
2	7/11/2005 2:00 PM	154 00	19,000 00	YES	4 00	Buy-through	Contracted amount	
1	7/15/2005 1:00 PM	154 00	0 00	NO	4 00	Buy-through	Contracted amount	
2	7/15/2005 1:00 PM	154 00	17,000 00	YES	4 00	Buy-through	Contracted amount	
4	7/15/2005 1:00 PM	154 00	0 00	NO	3 00	Buy-through	Contracted amount	
4	7/18/2005 12:00 PM	159 00	0 00	NO	4 00	Buy-through	Contracted amount	

Kentucky Utilities Company  
Case No. 2009-00548  
Detailed Curtailment Data

Reference #	Start Date/Time	Offer Price	KW Hrs Purchased	Offer Accepted	Hours	Curtailment or Buy-through	Amount Requested	Non-Compliance Amount (MW)
1	7/18/2005 1:00 PM	159 00	0 00	NO	5 00	Buy-through	Contracted amount	
2	7/18/2005 1:00 PM	159 00	18,000 00	YES	5 00	Buy-through	Contracted amount	
1	8/2/2005 1:30 PM	223 00		NO	6 00	Buy-through	Contracted amount	
1	8/3/2005 1:00 PM			NO	5 00	Buy-through	Contracted amount	
2	8/3/2005 1:00 PM		17,000 00	YES	5 00	Buy-through	Contracted amount	
4	8/3/2005 1:00 PM		0 00	NO	3 00	Buy-through	Contracted amount	
3	8/3/2005 1:30 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
4	8/4/2005 12:30 PM		0 00	NO	4 00	Buy-through	Contracted amount	
1	8/4/2005 1:00 PM			NO	5 00	Buy-through	Contracted amount	
2	8/4/2005 1:00 PM		18,000 00	YES	5 00	Buy-through	Contracted amount	
4	8/11/2005 1:00 PM		0 00	NO	3 50	Buy-through	Contracted amount	
1	8/12/2005 1:00 PM		28,000 00	YES	4 00	Buy-through	Contracted amount	
2	8/12/2005 1:00 PM		20,000 00	YES	4 00	Buy-through	Contracted amount	
4	8/12/2005 1:00 PM		0 00	NO	3 50	Buy-through	Contracted amount	
3	9/12/2005 2:00 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
3	9/13/2005 4:00 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	9/14/2005 1:45 PM	N/A		N/A	2 60	Curtailment	Contracted amount	
3	9/22/2005 2:30 PM	N/A		N/A	3 25	Curtailment	Contracted amount	
3	9/23/2005 2:00 PM	N/A		N/A	2 25	Curtailment	Contracted amount	
3	10/3/2005 1:00 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
3	10/4/2005 1:35 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
2	11/22/2005 4:00 PM	80 00	19,000 00	YES	1 00	Buy-through	Contracted amount	
3	1/17/2006 2:00 PM	N/A		N/A	6 50	Curtailment	Contracted amount	
3	1/18/2006 8:35 AM	N/A		N/A	3 17	Curtailment	Contracted amount	
3	1/19/2006 8:30 AM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	1/23/2006 7:45 PM	N/A		N/A	2 25	Curtailment	Contracted amount	
3	1/26/2006 8:05 AM	N/A		N/A	2 92	Curtailment	Contracted amount	
3	1/26/2006 7:30 PM	N/A		N/A	2 50	Curtailment	Contracted amount	
3	1/27/2006 8:00 AM	N/A		N/A	2 50	Curtailment	Contracted amount	
3	2/2/2006 7:00 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
3	2/6/2006 7:00 PM	N/A		N/A	2 75	Curtailment	Contracted amount	
3	2/7/2006 8:00 AM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	2/9/2006 8:00 AM	N/A		N/A	1 75	Curtailment	Contracted amount	
3	2/13/2006 8:45 AM	N/A		N/A	2 58	Curtailment	Contracted amount	
3	2/15/2006 7:00 PM	N/A		N/A	1 25	Curtailment	Contracted amount	
3	2/16/2006 7:10 PM	N/A		N/A	1 92	Curtailment	Contracted amount	
3	2/20/2006 10:35 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	2/20/2006 7:20 PM	N/A		N/A	1 92	Curtailment	Contracted amount	
3	2/24/2006 8:20 AM	N/A		N/A	1 75	Curtailment	Contracted amount	
3	3/3/2006 7:10 AM	N/A		N/A	0 25	Curtailment	Contracted amount	
3	3/3/2006 9:30 AM	N/A		N/A	2 50	Curtailment	Contracted amount	
3	3/6/2006 8:20 AM	N/A		N/A	5 50	Curtailment	Contracted amount	
3	3/6/2006 7:35 PM	N/A		N/A	1 67	Curtailment	Contracted amount	
3	3/7/2006 7:45 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	3/8/2006 10:20 AM	N/A		N/A	0 67	Curtailment	Contracted amount	
3	3/8/2006 7:00 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	3/9/2006 7:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	3/13/2006 1:00 PM	N/A		N/A	1 75	Curtailment	Contracted amount	
3	3/15/2006 11:30 AM	N/A		N/A	2 50	Curtailment	Contracted amount	
3	3/17/2006 11:45 AM	N/A		N/A	2 08	Curtailment	Contracted amount	
3	3/20/2006 10:15 AM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	3/21/2006 8:15 AM	N/A		N/A	2 75	Curtailment	Contracted amount	
3	3/21/2006 7:30 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	3/22/2006 7:50 PM	N/A		N/A	1 17	Curtailment	Contracted amount	
3	3/27/2006 8:15 AM	N/A		N/A	1 75	Curtailment	Contracted amount	
3	6/21/2006 3:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	6/22/2006 3:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	7/13/2006 1:35 PM	N/A		N/A	1 58	Curtailment	Contracted amount	
3	7/17/2006 3:20 PM	N/A		N/A	2 67	Curtailment	Contracted amount	
3	7/18/2006 3:40 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	7/31/2006 3:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
1	8/1/2006 1:45 PM	N/A	0 00	N/A	4 75	Curtailment	Contracted amount	
2	8/1/2006 1:45 PM	N/A	0 00	N/A	4 75	Curtailment	Contracted amount	
4	8/1/2006 1:45 PM	N/A	0 00	N/A	4 75	Curtailment	Contracted amount	
3	8/1/2006 2:05 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
1	8/2/2006 12:00 PM	N/A	0 00	N/A	5 75	Curtailment	Contracted amount	
2	8/2/2006 12:00 PM	N/A	0 00	N/A	5 75	Curtailment	Contracted amount	
4	8/2/2006 12:00 PM	N/A	0 00	N/A	7 00	Curtailment	Contracted amount	
3	8/2/2006 2:00 PM	N/A		N/A	3 50	Curtailment	Contracted amount	
3	8/3/2006 2:30 PM	N/A		N/A	2 33	Curtailment	Contracted amount	
3	8/7/2006 1:30 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
3	9/5/2006 10:31 AM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	9/13/2006 1:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	9/14/2006 1:45 PM	N/A		N/A	1 25	Curtailment	Contracted amount	
3	9/19/2006 12:11 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	9/22/2006 7:30 PM	N/A		N/A	2 00	Curtailment	Contracted amount	

Kentucky Utilities Company  
Case No. 2009-00548  
Detailed Curtailment Data

Reference #	Start Date/Time	Offer Price	KW Hrs Purchased	Offer Accepted	Hours	Curtailment or Buy-through	Amount Requested	Non-Compliance Amount (MW)
3	9/25/2006 7:15 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	9/26/2006 7:51 PM	N/A		N/A	1 15	Curtailment	Contracted amount	
3	9/27/2006 7:30 AM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	10/4/2006 9:36 AM	N/A		N/A	1 23	Curtailment	Contracted amount	
3	10/17/2006 10:30 AM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	10/20/2006 10:00 AM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	10/23/2006 10:10 AM	N/A		N/A	4 00	Curtailment	Contracted amount	
3	10/23/2006 6:53 PM	N/A		N/A	1 45	Curtailment	Contracted amount	
3	11/2/2006 6:54 PM	N/A		N/A	3 10	Curtailment	Contracted amount	
3	11/3/2006 12:00 PM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	11/9/2006 11:30 AM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	11/9/2006 6:30 PM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	11/10/2006 6:27 PM	N/A		N/A	1 27	Curtailment	Contracted amount	
3	11/13/2006 6:15 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	11/15/2006 10:05 AM	N/A		N/A	0 92	Curtailment	Contracted amount	
3	11/16/2006 10:15 AM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	11/16/2006 5:50 PM	N/A		N/A	1 08	Curtailment	Contracted amount	
3	11/17/2006 1:34 PM	N/A		N/A	1 27	Curtailment	Contracted amount	
3	11/17/2006 6:01 PM	N/A		N/A	0 98	Curtailment	Contracted amount	
1	11/21/2006 8:00 AM	75 00	0 00	NO	1 58	Buy-through	Contracted amount	
3	11/27/2006 5:40 PM	N/A		N/A	1 33	Curtailment	Contracted amount	
3	11/28/2006 12:25 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	11/28/2006 8:00 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	12/5/2006 6:00 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	12/7/2006 6:30 PM	N/A		N/A	2 42	Curtailment	Contracted amount	
1	12/8/2006 7:32 AM	N/A	0 00	N/A	0 50	Curtailment	Contracted amount	
2	12/8/2006 7:33 AM	N/A	0 00	N/A	0 50	Curtailment	Contracted amount	
3	12/13/2006 6:15 PM	N/A		N/A	0 83	Curtailment	Contracted amount	
3	12/14/2006 6:00 PM	N/A		N/A	0 75	Curtailment	Contracted amount	
3	1/1/2007 6:00 PM	N/A		N/A	1 33	Curtailment	Contracted amount	
3	1/4/2007 5:30 PM	N/A		N/A	2 50	Curtailment	Contracted amount	
3	1/16/2007 8:30 AM	N/A		N/A	0 83	Curtailment	Contracted amount	
3	1/16/2007 6:55 PM	N/A		N/A	0 83	Curtailment	Contracted amount	
3	1/17/2007 6:00 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	1/18/2007 6:15 PM	N/A		N/A	0 75	Curtailment	Contracted amount	
3	1/22/2007 5:45 PM	N/A		N/A	3 75	Curtailment	Contracted amount	
3	1/24/2007 11:20 AM	N/A		N/A	0 67	Curtailment	Contracted amount	
3	1/26/2007 8:25 AM	N/A		N/A	1 17	Curtailment	Contracted amount	
3	1/31/2007 9:15 AM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	2/5/2007 6:41 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	2/8/2007 8:25 PM	N/A		N/A	1 17	Curtailment	Contracted amount	
3	2/9/2007 6:45 PM	N/A		N/A	1 25	Curtailment	Contracted amount	
3	2/14/2007 6:10 PM	N/A		N/A	2 33	Curtailment	Contracted amount	
1	2/15/2007 1:00 PM	118 00	1,000 00	YES	6 00	Buy-through	Contracted amount	
4	2/15/2007 1:00 PM	118 00	0 00	NO	4 00	Buy-through	Contracted amount	
1	2/15/2007 7:00 PM	118 00	10,000 00	YES	4 00	Buy-through	Contracted amount	
3	2/22/2007 7:06 PM	N/A		N/A	1 98	Curtailment	Contracted amount	
3	2/27/2007 9:00 AM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	2/28/2007 11:00 AM	N/A		N/A	0 50	Curtailment	Contracted amount	
3	3/1/2007 9:00 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	3/12/2007 7:10 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	3/13/2007 7:30 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	3/16/2007 7:30 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	3/20/2007 9:02 AM	N/A		N/A	1 05	Curtailment	Contracted amount	
3	3/21/2007 7:52 PM	N/A		N/A	1 47	Curtailment	Contracted amount	
3	3/22/2007 7:32 PM	N/A		N/A	0 97	Curtailment	Contracted amount	
3	3/23/2007 9:55 AM	N/A		N/A	3 58	Curtailment	Contracted amount	
1	3/27/2007 8:00 AM	56 00	30,000 00	YES	3 00	Buy-through	Contracted amount	
2	3/27/2007 8:00 AM	57 00	5,000 00	YES	3 00	Buy-through	Contracted amount	
3	3/28/2007 9:30 AM	N/A		N/A	1 25	Curtailment	Contracted amount	
3	4/16/2007 8:04 PM	N/A		N/A	0 43	Curtailment	Contracted amount	
3	4/30/2007 3:40 PM	N/A		N/A	0 67	Curtailment	Contracted amount	
1	5/10/2007 1:00 PM	105 00	1,000 00	YES	8 00	Buy-through	Contracted amount	
2	5/10/2007 1:00 PM	105 00	20,000 00	YES	8 00	Buy-through	Contracted amount	
4	5/10/2007 1:00 PM	105 00	0 00	NO	8 00	Buy-through	Contracted amount	
3	7/3/2007 1:25 PM	N/A		N/A	4 58	Curtailment	Contracted amount	
1	7/6/2007 11:00 AM	85 00	1,000 00	YES	7 00	Buy-through	Contracted amount	
2	7/6/2007 11:00 AM	85 00	21,000 00	YES	7 00	Buy-through	Contracted amount	
3	7/6/2007 12:40 PM	N/A		N/A	0 58	Curtailment	Contracted amount	
1	7/9/2007 10:00 AM	125 00	1,000 00	YES	9 00	Buy-through	Contracted amount	
2	7/9/2007 10:00 AM	125 00	19,000 00	YES	1 00	Buy-through	Contracted amount	
4	7/9/2007 10:00 AM	140 00	0 00	NO	5 00	Buy-through	Contracted amount	
2	7/9/2007 11:00 AM	125 00	21,000 00	YES	8 00	Buy-through	Contracted amount	
3	7/9/2007 3:15 PM	N/A		N/A	2 75	Curtailment	Contracted amount	
1	7/10/2007 10:00 AM	112 00	1,000 00	YES	9 00	Buy-through	Contracted amount	
2	7/10/2007 10:00 AM	112 00	21,000 00	YES	9 00	Buy-through	Contracted amount	

Kentucky Utilities Company  
Case No. 2009-00548  
Detailed Curtailment Data

Reference #	Start Date/Time	Offer Price	KW Hrs Purchased	Offer Accepted	Hours	Curtailment or Buy-through	Amount Requested	Non-Compliance Amount (MW)
4	7/10/2007 10:00 AM	93 00	0 00	NO	5 00	Buy-through	Contracted amount	
1	7/17/2007 1:00 PM	80 00	32,000 00	YES	6 00	Buy-through	Contracted amount	
2	7/17/2007 1:00 PM	80 00	20,000 00	YES	6 00	Buy-through	Contracted amount	
1	7/19/2007 10:00 AM	95 00	1,000 00	YES	7 00	Buy-through	Contracted amount	
2	7/19/2007 10:00 AM	95 00	20,000 00	YES	3 00	Buy-through	Contracted amount	
4	7/19/2007 10:00 AM	95 00	0 00	NO	5 00	Buy-through	Contracted amount	
2	7/19/2007 1:00 PM	95 00	14,000 00	YES	1 67	Buy-through	Contracted amount	
2	7/19/2007 2:40 PM	95 00	20,000 00	YES	2 33	Buy-through	Contracted amount	
3	8/3/2007 8:10 PM	N/A		N/A	0 83	Curtailment	Contracted amount	
4	8/6/2007 12:00 PM	107 00	0 00	NO	3 00	Buy-through	Contracted amount	
1	8/6/2007 12:20 PM	N/A	0 00	N/A	4 67	Curtailment	Contracted amount	
2	8/6/2007 12:20 PM	N/A	0 00	N/A	4 67	Curtailment	Contracted amount	
1	8/7/2007 12:00 PM	142 00	1,000 00	YES	6 00	Buy-through	Contracted amount	
2	8/7/2007 12:00 PM	142 00	21,000 00	YES	6 00	Buy-through	Contracted amount	
4	8/7/2007 12:00 PM	142 00	0 00	NO	3 00	Buy-through	Contracted amount	
1	8/8/2007 12:00 PM	130 00	1,000 00	YES	6 00	Buy-through	Contracted amount	
2	8/8/2007 12:00 PM	130 00	21,000 00	YES	6 00	Buy-through	Contracted amount	
4	8/8/2007 12:00 PM	130 00	0 00	NO	3 00	Buy-through	Contracted amount	
1	8/9/2007 12:00 PM	163 00	0 00	NO	6 00	Buy-through	Contracted amount	
2	8/9/2007 12:00 PM	163 00	21,000 00	YES	6 00	Buy-through	Contracted amount	
4	8/9/2007 12:00 PM	163 00	0 00	NO	3 00	Buy-through	Contracted amount	
1	8/10/2007 12:00 PM	102 00	0 00	NO	6 00	Buy-through	Contracted amount	
2	8/10/2007 12:00 PM	102 00	21,000 00	YES	6 00	Buy-through	Contracted amount	
4	8/10/2007 12:00 PM	102 00	0 00	NO	3 00	Buy-through	Contracted amount	
1	8/13/2007 12:00 PM	115 00	1,000 00	YES	2 00	Buy-through	Contracted amount	
2	8/13/2007 12:00 PM	115 00	21,000 00	YES	6 00	Buy-through	Contracted amount	
4	8/13/2007 12:00 PM	115 00	0 00	NO	3 00	Buy-through	Contracted amount	
1	8/13/2007 2:00 PM	115 00	1,000 00	YES	4 00	Buy-through	Contracted amount	
1	8/14/2007 11:00 AM	90 00	0 00	NO	9 00	Buy-through	Contracted amount	
2	8/14/2007 11:00 AM	90 00	21,000 00	YES	9 00	Buy-through	Contracted amount	
4	8/14/2007 11:00 AM	97 00	0 00	NO	4 00	Buy-through	Contracted amount	
1	8/15/2007 12:15 PM	N/A	0 00	N/A	6 08	Curtailment	Contracted amount	
2	8/15/2007 12:15 PM	N/A	0 00	N/A	6 08	Curtailment	Contracted amount	
3	8/15/2007 12:15 PM	N/A		N/A	6 33	Curtailment	Contracted amount	
4	8/15/2007 12:15 PM	N/A	0 00	N/A	2 75	Curtailment	Contracted amount	
1	8/16/2007 12:00 PM	107 00	0 00	NO	6 75	Buy-through	Contracted amount	
2	8/16/2007 12:00 PM	107 00	15,000 00	YES	6 00	Buy-through	Contracted amount	
4	8/16/2007 12:00 PM	107 00	0 00	NO	3 00	Buy-through	Contracted amount	
3	8/16/2007 5:32 PM	N/A		N/A	1 22	Curtailment	Contracted amount	
1	8/22/2007 2:00 PM	110 00	0 00	NO	5 00	Buy-through	Contracted amount	
2	8/22/2007 2:00 PM	110 00	13,000 00	YES	1 00	Buy-through	Contracted amount	
2	8/22/2007 3:00 PM	105 00	14,000 00	YES	1 00	Buy-through	Contracted amount	
2	8/22/2007 4:00 PM	102 00	14,000 00	YES	1 00	Buy-through	Contracted amount	
2	8/22/2007 5:00 PM	115 00	11,000 00	YES	1 00	Buy-through	Contracted amount	
2	8/22/2007 6:00 PM	110 00	11,000 00	YES	1 00	Buy-through	Contracted amount	
4	8/23/2007 11:00 AM	130 00	0 00	NO	9 00	Buy-through	Contracted amount	
1	8/23/2007 12:00 PM	130 00	0 00	NO	8 00	Buy-through	Contracted amount	
2	8/23/2007 12:00 PM	130 00	14,000 00	YES	8 00	Buy-through	Contracted amount	
1	8/24/2007 12:00 PM	100 00	0 00	NO	6 00	Buy-through	Contracted amount	
2	8/24/2007 12:00 PM	100 00	18,000 00	YES	6 00	Buy-through	Contracted amount	
4	8/24/2007 12:00 PM	100 00	0 00	NO	5 00	Buy-through	Contracted amount	
1	10/8/2007 1:40 PM	N/A	0 00	N/A	1 17	Curtailment	Contracted amount	
2	10/8/2007 1:40 PM	N/A	0 00	N/A	1 17	Curtailment	Contracted amount	
3	10/11/2007 6:54 PM	N/A		N/A	1 67	Curtailment	Contracted amount	
3	10/15/2007 6:20 PM	N/A		N/A	1 33	Curtailment	Contracted amount	
3	10/19/2007 6:40 PM	N/A		N/A	1 08	Curtailment	Contracted amount	
3	10/22/2007 11:30 AM	N/A		N/A	1 17	Curtailment	Contracted amount	
3	10/24/2007 3:30 PM	N/A		N/A	1 42	Curtailment	Contracted amount	
3	11/16/2007 7:15 PM	N/A		N/A	1 75	Curtailment	Contracted amount	
3	11/21/2007 10:30 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	11/27/2007 6:10 PM	N/A		N/A	1 83	Curtailment	Contracted amount	
3	11/28/2007 7:05 PM	N/A		N/A	0 67	Curtailment	Contracted amount	
3	11/29/2007 6:50 PM	N/A		N/A	0 67	Curtailment	Contracted amount	
3	12/11/2007 6:20 PM	N/A		N/A	0 67	Curtailment	Contracted amount	
3	12/14/2007 5:45 PM	N/A		N/A	0 75	Curtailment	Contracted amount	
3	1/10/2008 11:35 AM	N/A		N/A	1 67	Curtailment	Contracted amount	
3	1/15/2008 6:20 PM	N/A		N/A	0 83	Curtailment	Contracted amount	
3	1/23/2008 5:30 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	2/4/2008 10:52 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	2/6/2008 6:36 PM	N/A		N/A	0 57	Curtailment	Contracted amount	
3	2/8/2008 2:40 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	2/27/2008 6:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	3/17/2008 7:15 PM	N/A		N/A	0 75	Curtailment	Contracted amount	
3	3/19/2008 8:09 PM	N/A		N/A	1 52	Curtailment	Contracted amount	
3	3/20/2008 7:48 PM	N/A		N/A	0 70	Curtailment	Contracted amount	
3	3/26/2008 8:00 AM	N/A		N/A	4 50	Curtailment	Contracted amount	

Kentucky Utilities Company  
Case No. 2009-00548  
Detailed Curtailment Data

Reference #	Start Date/Time	Offer Price	KW Hrs Purchased	Offer Accepted	Hours	Curtailment or Buy-through	Amount Requested	Non-Compliance Amount (MW)
3	3/26/2008 2:10 PM	N/A		N/A	3 25	Curtailment	Contracted amount	
3	3/28/2008 7:42 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	3/31/2008 7:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	4/4/2008 8:47 PM	N/A		N/A	0 63	Curtailment	Contracted amount	
3	5/6/2008 8:20 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
4	6/9/2008 12:00 PM	160 00	0 00	NO	6 00	Buy-through	Contracted amount	
1	6/9/2008 12:00 PM	N/A	0 00	N/A	6 00	Curtailment	Contracted amount	
2	6/9/2008 12:00 PM	N/A	0 00	N/A	6 00	Curtailment	Contracted amount	
3	6/11/2008 4:15 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	7/21/2008 11:30 AM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	7/22/2008 12:32 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	7/29/2008 11:10 AM	N/A		N/A	1 33	Curtailment	Contracted amount	
1	7/29/2008 12:00 PM	150 00	1,000 00	YES	5 00	Buy-through	Contracted amount	
2	7/29/2008 12:00 PM	150 00	20,000 00	YES	5 00	Buy-through	Contracted amount	
4	7/29/2008 12:00 PM	150 00	3,000 00	YES	5 00	Buy-through	Contracted amount	
1	8/1/2008 11:00 AM	135 00	1,000 00	YES	2 00	Buy-through	Contracted amount	
2	8/1/2008 11:00 AM	135 00	20,000 00	YES	2 00	Buy-through	Contracted amount	
4	8/1/2008 11:00 AM	135 00	3,000 00	YES	2 00	Buy-through	Contracted amount	
1	8/1/2008 1:20 PM	N/A	0 00	N/A	0 67	Curtailment	Contracted amount	
2	8/1/2008 1:20 PM	N/A	0 00	N/A	0 67	Curtailment	Contracted amount	
4	8/1/2008 1:20 PM	N/A	0 00	N/A	4 67	Curtailment	Contracted amount	
1	8/1/2008 2:00 PM	160 00	1,000 00	YES	4 00	Buy-through	Contracted amount	
2	8/1/2008 2:00 PM	160 00	20,000 00	YES	4 00	Buy-through	Contracted amount	
1	8/4/2008 12:00 PM	115 00	1,000 00	YES	8 00	Buy-through	Contracted amount	
2	8/4/2008 12:00 PM	115 00	20,000 00	YES	8 00	Buy-through	Contracted amount	
4	8/4/2008 12:00 PM	115 00	3,000 00	YES	8 00	Buy-through	Contracted amount	
1	8/5/2008 11:00 AM	120 00	26,000 00	YES	8 00	Buy-through	Contracted amount	
2	8/5/2008 11:00 AM	120 00	21,000 00	YES	8 00	Buy-through	Contracted amount	
4	8/5/2008 11:00 AM	120 00	3,000 00	YES	8 00	Buy-through	Contracted amount	
1	8/6/2008 10:00 AM	115 00	1,000 00	YES	6 00	Buy-through	Contracted amount	
2	8/6/2008 10:00 AM	115 00	16,000 00	YES	6 00	Buy-through	Contracted amount	
3	8/6/2008 1:35 PM	N/A		N/A	0 75	Curtailment	Contracted amount	
1	8/7/2008 10:00 AM	119 00	1,000 00	YES	6 00	Buy-through	Contracted amount	
2	8/7/2008 10:00 AM	119 00	20,000 00	YES	6 00	Buy-through	Contracted amount	
1	8/7/2008 11:00 AM	119 00	25,000 00	YES	5 00	Buy-through	Contracted amount	
1	8/20/2008 12:00 PM	78 00	26,000 00	YES	7 00	Buy-through	Contracted amount	
2	8/20/2008 12:00 PM	78 00	12,000 00	YES	7 00	Buy-through	Contracted amount	
4	8/20/2008 12:00 PM	78 00	3,000 00	YES	7 00	Buy-through	Contracted amount	
1	8/21/2008 11:00 AM	79 50	1,000 00	YES	7 00	Buy-through	Contracted amount	
2	8/21/2008 11:00 AM	79 50	18,000 00	YES	7 00	Buy-through	Contracted amount	
4	8/21/2008 11:00 AM	79 50	3,000 00	YES	7 00	Buy-through	Contracted amount	
1	9/2/2008 12:00 PM	120 00	26,000 00	YES	8 00	Buy-through	Contracted amount	
2	9/2/2008 12:00 PM	120 00	20,000 00	YES	8 00	Buy-through	Contracted amount	
4	9/2/2008 12:00 PM	120 00	0 00	NO	8 00	Buy-through	Contracted amount	
3	9/2/2008 2:50 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
1	9/3/2008 12:00 PM	92 00	1,000 00	YES	8 00	Buy-through	Contracted amount	
2	9/3/2008 12:00 PM	92 00	21,000 00	YES	8 00	Buy-through	Contracted amount	
4	9/3/2008 12:00 PM	92 00	0 00	NO	8 00	Buy-through	Contracted amount	
3	9/3/2008 2:40 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	9/4/2008 7:17 PM	N/A		N/A	1 22	Curtailment	Contracted amount	
3	9/11/2008 11:40 AM	N/A		N/A	1 17	Curtailment	Contracted amount	
3	9/19/2008 12:45 PM	N/A		N/A	4 75	Curtailment	Contracted amount	
3	9/23/2008 7:45 PM	N/A		N/A	1 08	Curtailment	Contracted amount	
3	10/8/2008 9:25 AM	N/A		N/A	1 08	Curtailment	Contracted amount	
3	10/10/2008 6:55 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	10/13/2008 6:55 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	10/15/2008 2:15 PM	N/A		N/A	1 75	Curtailment	Contracted amount	
3	11/19/2008 5:30 PM	N/A		N/A	4 00	Curtailment	Contracted amount	
3	1/7/2009 5:42 PM	N/A		N/A	1 30	Curtailment	Contracted amount	
3	1/8/2009 8:10 AM	N/A		N/A	1 67	Curtailment	Contracted amount	
3	1/9/2009 8:00 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	1/12/2009 8:00 AM	N/A		N/A	0 60	Curtailment	Contracted amount	
3	1/13/2009 5:40 PM	N/A		N/A	1 42	Curtailment	Contracted amount	
1	1/15/2009 7:00 AM	70 00	30,000 00	YES	14 00	Buy-through	Contracted amount	
4	1/15/2009 7:00 AM	70 00	0 00	NO	14 00	Buy-through	Contracted amount	
3	1/15/2009 11:59 AM	N/A		N/A	2 52	Curtailment	Contracted amount	
1	1/16/2009 7:00 AM	70 00	30,000 00	YES	14 00	Buy-through	Contracted amount	
4	1/16/2009 7:00 AM	70 00	0 00	NO	14 00	Buy-through	Contracted amount	
3	1/22/2009 8:10 AM	N/A		N/A	1 58	Curtailment	Contracted amount	
3	1/23/2009 6:00 PM	N/A		N/A	1 25	Curtailment	Contracted amount	
3	2/4/2009 6:00 PM	N/A		N/A	4 00	Curtailment	Contracted amount	
3	2/16/2009 6:50 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	2/17/2009 8:00 AM	N/A		N/A	2 15	Curtailment	Contracted amount	
3	3/2/2009 8:00 AM	N/A		N/A	5 83	Curtailment	Contracted amount	
3	3/2/2009 5:30 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
3	3/3/2009 8:00 AM	N/A		N/A	5 00	Curtailment	Contracted amount	

Kentucky Utilities Company  
Case No. 2009-00548  
Detailed Curtailment Data

Reference #	Start Date/Time	Offer Price	KW Hrs Purchased	Offer Accepted	Hours	Curtailment or Buy-through	Amount Requested	Non-Compliance Amount (MW)
3	3/11/2009 8:25 PM	N/A		N/A	1 17	Curtailment	Contracted amount	
3	3/12/2009 5:10 PM	N/A		N/A	3 08	Curtailment	Contracted amount	
3	5/19/2009 4:41 PM	N/A		N/A	0 50	Curtailment	Contracted amount	
1	6/2/2009 1:00 PM	44 00	20,000 00	YES	4 00	Buy-through	Contracted amount	
2	6/2/2009 1:00 PM	44 00	0 00	NO	4 00	Buy-through	Contracted amount	
4	6/2/2009 1:00 PM	44 00	0 00	NO	4 00	Buy-through	Contracted amount	
3	6/2/2009 1:20 PM	N/A		N/A	1 70	Curtailment	Contracted amount	
3	6/9/2009 1:40 PM	N/A		N/A	5 67	Curtailment	Contracted amount	
3	6/12/2009 2:15 PM	N/A		N/A	2 70	Curtailment	Contracted amount	
3	6/15/2009 12:00 PM	N/A		N/A	5 87	Curtailment	Contracted amount	
3	6/16/2009 12:35 PM	N/A		N/A	1 92	Curtailment	Contracted amount	
1	6/17/2009 1:00 PM	47 00	29,000 00	YES	4 00	Buy-through	Contracted amount	
4	6/17/2009 1:00 PM	0 00	0 00	NO	4 00	Buy-through	Contracted amount	
1	6/23/2009 1:00 PM	62 00	28,000 00	YES	4 33	Buy-through	Contracted amount	
4	6/23/2009 1:00 PM	62 00	0 00	NO	5 00	Buy-through	Contracted amount	
1	6/24/2009 1:00 PM	68 00	0 00	NO	5 00	Buy-through	Contracted amount	
4	6/24/2009 1:00 PM	68 00	0 00	NO	5 00	Buy-through	Contracted amount	
1	6/25/2009 1:00 PM	62 00	28,000 00	YES	5 00	Buy-through	Contracted amount	
4	6/25/2009 1:00 PM	62 00	0 00	NO	5 00	Buy-through	Contracted amount	
3	6/30/2009 3:15 PM	N/A		N/A	2 75	Curtailment	Contracted amount	
3	6/30/2009 7:00 PM	N/A		N/A	0 75	Curtailment	Contracted amount	
3	7/8/2009 11:41 AM	N/A		N/A	2 32	Curtailment	Contracted amount	
3	7/10/2009 3:30 PM	N/A		N/A	3 08	Curtailment	Contracted amount	
3	7/16/2009 3:50 PM	N/A		N/A	2 67	Curtailment	Contracted amount	
3	7/20/2009 6:15 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	7/23/2009 3:00 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
3	7/24/2009 2:00 PM	N/A		N/A	1 50	Curtailment	Contracted amount	
3	8/5/2009 4:58 PM	N/A		N/A	1 62	Curtailment	Contracted amount	
3	8/7/2009 1:35 PM	N/A		N/A	1 42	Curtailment	Contracted amount	
3	8/10/2009 12:42 PM	N/A		N/A	1 63	Curtailment	Contracted amount	
1	8/10/2009 1:00 PM	52 00	30,000 00	YES	1 00	Buy-through	Contracted amount	
1	8/10/2009 2:00 PM	N/A	0 00	N/A	1 00	Curtailment	Contracted amount	
1	8/11/2009 11:00 AM	37 50	30,000 00	YES	2 50	Buy-through	Contracted amount	
3	8/11/2009 12:45 PM	N/A		N/A	3 00	Curtailment	Contracted amount	
1	8/11/2009 1:30 PM	N/A	0 00	N/A	3 00	Curtailment	Contracted amount	
3	8/11/2009 6:30 PM	N/A		N/A	2 50	Curtailment	Contracted amount	
1	8/12/2009 11:00 AM	36 50	30,000 00	YES	6 00	Buy-through	Contracted amount	
3	8/12/2009 2:02 PM	N/A		N/A	5 55	Curtailment	Contracted amount	
1	8/13/2009 1:00 PM	36 00	30,000 00	YES	1 00	Buy-through	Contracted amount	
3	8/13/2009 1:55 PM	N/A		N/A	5 58	Curtailment	Contracted amount	
1	8/13/2009 2:00 PM	44 00	30,000 00	YES	3 00	Buy-through	Contracted amount	
1	8/17/2009 10:00 AM	53 00	0 00	NO	1 00	Buy-through	Contracted amount	
4	8/17/2009 10:00 AM	53 00	0 00	NO	8 00	Buy-through	Contracted amount	
1	8/17/2009 11:00 AM	53 00	1,000 00	YES	7 00	Buy-through	Contracted amount	
3	8/17/2009 3:20 PM	N/A		N/A	0 67	Curtailment	Contracted amount	
3	8/18/2009 1:00 PM	N/A		N/A	2 00	Curtailment	Contracted amount	
1	8/26/2009 1:00 PM	N/A	0 00	N/A	1 00	Curtailment	Contracted amount	
1	8/26/2009 2:00 PM	40 00	30,000 00	YES	4 00	Buy-through	Contracted amount	
1	8/27/2009 11:00 AM	38 00	30,000 00	YES	7 00	Buy-through	Contracted amount	
2	8/27/2009 11:00 AM	38 00	18,000 00	YES	7 00	Buy-through	Contracted amount	
3	9/14/2009 3:10 PM	N/A		N/A	2 33	Curtailment	Contracted amount	
1	11/4/2009 7:17 AM	N/A	0 00	N/A	0 72	Curtailment	Contracted amount	
3	11/5/2009 6:32 PM	N/A		N/A	0 67	Curtailment	Contracted amount	
3	11/18/2009 8:35 PM	N/A		N/A	1 00	Curtailment	Contracted amount	
3	12/10/2009 6:48 PM	N/A		N/A	2 42	Curtailment	Contracted amount	
1	12/11/2009 6:45 AM	N/A	0 00	N/A	3 00	Curtailment	Contracted amount	
1	12/11/2009 9:45 AM	58 00	28,000 00	YES	1 25	Buy-through	Contracted amount	
1	12/11/2009 11:00 AM	65 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
1	12/11/2009 12:00 PM	65 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
1	12/11/2009 1:00 PM	58 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
1	12/11/2009 2:00 PM	46 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
1	12/11/2009 3:00 PM	65 00	28,000 00	YES	4 00	Buy-through	Contracted amount	
3	12/15/2009 7:00 PM	N/A		N/A	1 75	Curtailment	Contracted amount	
1	12/16/2009 6:22 AM	N/A	0 00	N/A	2 38	Curtailment	Contracted amount	
1	12/16/2009 8:45 AM	70 00	1,000 00	YES	0 25	Buy-through	Contracted amount	
1	12/16/2009 9:00 AM	68 00	1,000 00	YES	1 00	Buy-through	Contracted amount	
1	12/16/2009 10:00 AM	57 00	1,000 00	YES	1 00	Buy-through	Contracted amount	
1	12/16/2009 11:00 AM	52 00	1,000 00	YES	1 00	Buy-through	Contracted amount	
1	12/16/2009 12:00 PM	48 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
1	12/17/2009 6:10 AM	68 00	28,000 00	YES	4 83	Buy-through	Contracted amount	
3	12/17/2009 8:00 AM	N/A		N/A	0 83	Curtailment	Contracted amount	
1	12/17/2009 11:00 AM	50 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
1	1/4/2010 7:00 AM	140 00	0 00	NO	5 50	Buy-through	Contracted amount	
2	1/4/2010 7:00 AM	140 00	0 00	NO	5 50	Buy-through	Contracted amount	
1	1/4/2010 12:30 PM	60 00	28,000 00	YES	3 50	Buy-through	Contracted amount	
2	1/4/2010 12:30 PM	60 00	6,000 00	YES	3 50	Buy-through	Contracted amount	

Kentucky Utilities Company  
Case No. 2009-00548  
Detailed Curtailment Data

Reference #	Start Date/Time	Offer Price	KW Hrs Purchased	Offer Accepted	Hours	Curtailment or Buy-through	Amount Requested	Non-Compliance Amount (MW)
1	1/4/2010 4:00 PM	90 00	20,000 00	YES	5 00	Buy-through	Contracted amount	
2	1/4/2010 4:00 PM	90 00	12,000 00	YES	5 00	Buy-through	Contracted amount	
3	1/4/2010 6:15 PM	N/A		N/A	0 75	Curtailment	Contracted amount	
2	1/5/2010 5:21 AM	N/A	0 00	N/A	2 65	Curtailment	Contracted amount	
1	1/5/2010 5:24 AM	N/A	0 00	N/A	2 60	Curtailment	Contracted amount	
1	1/5/2010 8:00 AM	76 00	28,000 00	YES	11 00	Buy-through	Contracted amount	
2	1/5/2010 8:00 AM	76 00	17,000 00	YES	11 00	Buy-through	Contracted amount	
4	1/5/2010 8:00 AM	76 00	0 00	NO	4 00	Buy-through	Contracted amount	
1	1/6/2010 6:15 AM	N/A	0 00	N/A	0 75	Curtailment	Contracted amount	
2	1/6/2010 6:15 AM	N/A	0 00	N/A	0 75	Curtailment	Contracted amount	
1	1/6/2010 7:00 AM	78 00	28,000 00	YES	5 00	Buy-through	Contracted amount	
2	1/6/2010 7:00 AM	78 00	17,000 00	YES	5 00	Buy-through	Contracted amount	
4	1/6/2010 7:00 AM	78 00	0 00	NO	5 00	Buy-through	Contracted amount	
3	1/6/2010 9:05 AM	N/A		N/A	1 00	Curtailment	Contracted amount	
1	1/6/2010 12:00 PM	62 00	28,000 00	YES	4 00	Buy-through	Contracted amount	
2	1/6/2010 12:00 PM	62 00	17,000 00	YES	4 00	Buy-through	Contracted amount	
1	1/6/2010 4:00 PM	77 00	28,000 00	YES	4 00	Buy-through	Contracted amount	
2	1/6/2010 4:00 PM	77 00	17,000 00	YES	4 00	Buy-through	Contracted amount	
1	1/7/2010 6:00 AM	65 00	1,000 00	YES	1 00	Buy-through	Contracted amount	
2	1/7/2010 6:00 AM	65 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
2	1/7/2010 7:00 AM	70 00	17,000 00	YES	4 00	Buy-through	Contracted amount	
1	1/7/2010 10:00 AM	70 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
1	1/7/2010 11:00 AM	65 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
2	1/7/2010 11:00 AM	65 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
1	1/8/2010 6:00 AM	87 00	28,000 00	YES	14 00	Buy-through	Contracted amount	
2	1/8/2010 6:00 AM	87 00	17,000 00	YES	14 00	Buy-through	Contracted amount	
4	1/8/2010 6:00 AM	87 00	0 00	NO	10 00	Buy-through	Contracted amount	
1	1/11/2010 6:00 AM	N/A	0 00	N/A	4 00	Curtailment	Contracted amount	
2	1/11/2010 6:00 AM	N/A	0 00	N/A	4 00	Curtailment	Contracted amount	
4	1/11/2010 7:00 AM	N/A	0 00	N/A	9 00	Curtailment	Contracted amount	
1	1/11/2010 10:00 AM	86 00	28,000 00	YES	2 00	Buy-through	Contracted amount	
2	1/11/2010 10:00 AM	86 00	17,000 00	YES	2 00	Buy-through	Contracted amount	
1	1/11/2010 12:00 PM	N/A	0 00	N/A	3 50	Curtailment	Contracted amount	
2	1/11/2010 12:00 PM	N/A	0 00	N/A	3 50	Curtailment	Contracted amount	
1	1/12/2010 6:00 AM	N/A	0 00	N/A	2 00	Curtailment	Contracted amount	
2	1/12/2010 6:00 AM	N/A	0 00	N/A	2 00	Curtailment	Contracted amount	
1	1/12/2010 8:00 AM	85 00	1,000 00	YES	4 00	Buy-through	Contracted amount	
2	1/12/2010 8:00 AM	85 00	17,000 00	YES	4 00	Buy-through	Contracted amount	
4	1/12/2010 8:00 AM	85 00	0 00	NO	4 00	Buy-through	Contracted amount	
1	1/13/2010 7:00 AM	70 00	28,000 00	YES	4 00	Buy-through	Contracted amount	
2	1/13/2010 7:00 AM	70 00	10,000 00	YES	4 00	Buy-through	Contracted amount	
4	1/13/2010 7:00 AM	70 00	0 00	NO	4 00	Buy-through	Contracted amount	
2	1/14/2010 6:30 AM	N/A	0 00	N/A	2 50	Curtailment	Contracted amount	
2	1/14/2010 9:00 AM	56 00	17,000 00	YES	2 00	Buy-through	Contracted amount	
1	1/27/2010 7:30 AM	N/A	0 00	N/A	0 50	Curtailment	Contracted amount	
2	1/27/2010 7:30 AM	N/A	0 00	N/A	0 50	Curtailment	Contracted amount	
1	1/27/2010 8:00 AM	54 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
2	1/27/2010 8:00 AM	54 00	15,000 00	YES	1 00	Buy-through	Contracted amount	
1	1/27/2010 9:00 AM	58 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
2	1/27/2010 9:00 AM	58 00	18,000 00	YES	1 00	Buy-through	Contracted amount	
1	1/27/2010 10:00 AM	45 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
2	1/27/2010 10:00 AM	45 00	18,000 00	YES	1 00	Buy-through	Contracted amount	
3	1/28/2010 6:45 PM	N/A		N/A	0 83	Curtailment	Contracted amount	
1	1/29/2010 6:15 AM	48 00	28,000 00	YES	0 75	Buy-through	Contracted amount	
2	1/29/2010 6:15 AM	48 00	17,000 00	YES	0 75	Buy-through	Contracted amount	
1	1/29/2010 7:00 AM	63 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
2	1/29/2010 7:00 AM	63 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
1	1/29/2010 8:00 AM	65 00	28,000 00	YES	1 00	Buy-through	Contracted amount	
2	1/29/2010 8:00 AM	65 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
1	1/29/2010 9:00 AM	48 00	28,000 00	YES	5 00	Buy-through	Contracted amount	
2	1/29/2010 9:00 AM	48 00	17,000 00	YES	5 00	Buy-through	Contracted amount	
1	1/29/2010 3:00 PM	70 00	28,000 00	YES	5 00	Buy-through	Contracted amount	
2	1/29/2010 3:00 PM	70 00	17,000 00	YES	5 00	Buy-through	Contracted amount	
1	2/1/2010 6:00 AM	60 00	32,000 00	YES	1 00	Buy-through	Contracted amount	
2	2/1/2010 6:00 AM	60 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
1	2/1/2010 7:00 AM	62 00	32,000 00	YES	1 00	Buy-through	Contracted amount	
2	2/1/2010 7:00 AM	62 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
1	2/1/2010 8:00 AM	59 00	32,000 00	YES	1 00	Buy-through	Contracted amount	
2	2/1/2010 8:00 AM	59 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
1	2/1/2010 9:00 AM	58 00	32,000 00	YES	1 00	Buy-through	Contracted amount	
2	2/1/2010 9:00 AM	58 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
1	2/1/2010 10:00 AM	52 00	32,000 00	YES	1 00	Buy-through	Contracted amount	
2	2/1/2010 10:00 AM	52 00	17,000 00	YES	1 00	Buy-through	Contracted amount	
3	2/15/2010 10:15 AM	N/A		N/A	2 00	Curtailment	Contracted amount	
3	2/16/2010 5:35 PM	N/A		N/A	3 92	Curtailment	Contracted amount	
3	2/17/2010 6:50 PM	N/A		N/A	1 17	Curtailment	Contracted amount	

Kentucky Utilities Company

Case No. 2009-00548

Detailed Curtailment Data

<i>Reference #</i>	<i>Start Date/Time</i>	<i>Offer Price</i>	<i>KW Hrs Purchased</i>	<i>Offer Accepted</i>	<i>Hours</i>	<i>Curtailment or Buy-through</i>	<i>Amount Requested</i>	<i>Non-Compliance Amount (MW)</i>
3	2/18/2010 10:10 AM	N/A		N/A	1.42	Curtailment	Contracted amount	
3	2/23/2010 10:20 AM	N/A		N/A	3.67	Curtailment	Contracted amount	



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 4**

**Responding Witness: Robert M. Conroy**

- Q-4. Referring to Rider CSR2, please explain why (in KU's opinion) no customers are currently served under the rider. Provide all workpapers, studies, analyses, and documents supporting and/or underlying the response.
- 
- A-4. KU does not know why customers choose CSR service and can only speculate that industrial customers find more value in firm service relative to their production schedules.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 5**

**Responding Witness: Charles R. Schram/ William Steven Seelye**

Q-5. Please identify all reports, studies, and/or analyses conducted by on behalf of KU or its parent company in the past 5 years related in total or in part to retail interruptible or curtailable electric service in Kentucky.

---

A-5. No such studies have been conducted.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 6**

**Responding Witness: Charles R. Schram**

Q-6. Please explain in detail how KU (acting alone or in conjunction with affiliates) treats interruptible/curtailable load in:

- a. Developing its long-run load forecast?
- b. Determining its long-run need for future supply-side resources?
- c. Determining its need for operating reserve capacity?
- d. Providing ancillary services?

- A-6.
- a. In developing its long-run load forecast, KU assumes that loads for its interruptible/curtailable customers will be curtailed in hours with the highest demands (peak hours). For example, if KU is permitted to curtail a customer 200 hours per year, it assumes that customer's load will be curtailed in the top 200 hours (based on demand).
  - b. KU utilizes its long-run load forecast to determine its long-run need for future supply-side resources. Therefore, interruptible/curtailable customers are assumed to be curtailed during the hours with the highest demands.
  - c. KU does not consider interruptible/curtailable loads in determining its need for operating reserve capacity because there is no guarantee that interruptible/curtailable customers will be operating at the times when operating reserves are needed.
  - d. See response to (c.) above. Due to the uncertainty in interruptible/curtailable loads, they are not considered in providing ancillary services.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 7**

**Responding Witness: Lonnie E. Bellar/Charles R. Schram**

- Q-7. Identify all reserve sharing and/or coordination arrangements that KU has with other utility systems or organizations, and provide a current copy of all agreements related to such arrangements.
- 
- A-7. The documents responsive to the question are being provided under seal pursuant to a petition for confidential treatment.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 8**

**Responding Witness: Robert M. Conroy**

- Q-8. Please explain in detail how KU treats curtailment buy-through revenues in setting base rates and/or modifying its Fuel Adjustment Clause.
- A-8. KU reduces purchase power expense and kWh by the amount of buy-through power to ensure that retail customers' FAC reflects only those power purchases used to supply native load consumption not served by buy through energy.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 9**

**Responding Witness: William Steven Seelye**

- Q-9. Please identify and explain in detail how KU treats test-year curtailment buy-through revenues in the electric cost-of-service study filed in this case.
- A-9. In the cost of service study, curtailment buy through revenues are included in Sales to Ultimate Consumers shown on page 245 of Seelye Exhibit 20.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 10**

**Responding Witness: William Steven Seelye**

- Q-10. Please identify and explain in detail how KU treats test-year curtailment credits paid to CSR1 and CSR3 customers in the electric cost-of-service study filed in this case.
- 
- A-10. Test year curtailment credits paid to CSR1 and CSR3 customers are included in Sales to Ultimate Consumers shown on page 24 of Seelye Exhibit 20. Specifically, the revenues are credited to Power Service Primary or Industrial Service as applicable.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 11**

**Responding Witness: Robert M. Conroy**

Q-11. Please identify and describe in detail the conditions and circumstances under which KU can issue a curtailment request under:

- 
- a. Existing Riders CSR1, CSR2, and CSR3?
  - b. Proposed Rider CSR.

A-11. a. Curtailment requests under CSRs are issued at LG&E/KU's sole discretion for reliability and/or economic reasons.

- b. See response to part a.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 12**

**Responding Witness: Charles R. Schram**

Q-12. Please provide KU's current estimated cost in 2010 dollars of an installed combustion turbine. Provide all workpapers, studies, analyses, and documents supporting and/or underlying this estimate.

A-12. The Company's current estimate of the installed cost of a combustion turbine would incorporate two perspectives:

First, regarding the likely 'new order' cost, in preparation for the Companies' 2008 Integrated Resource Plan ("IRP"), consultants Cummins and Barnard were commissioned to provide estimated capital costs for a range of generation technologies. Their estimated overnight construction cost for a ~155 MW (net summer rating) combustion turbine was \$680/kW in \$2007 terms – equivalent to around \$730/kW in \$2010. A copy of the 2008 IRP is provided in response to Question No. 16.

Second, given current conditions in the power market, the Company would expect the prices of existing CT assets to be significantly below the cost of new construction. For example, amongst asset sales transactions reported within the last year, Oglethorpe Power Corporation acquired around 850 MW of combustion turbine capacity in Georgia at just over \$400/kW (the 360 MW Hartwell Energy Facility, purchased from an investor group, and the 495 MW Heard County Facility, purchased from Dynegy.)



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 13**

**Responding Witness: Charles R. Schram/ William Steven Seelye**

Q-13. Please provide a levelized fixed charge rate for a new combustion turbine using KU's cost of capital and tax rates. Provide all workpapers, studies, analyses, and documents supporting and/or underlying this response.

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A-13. See attached.

IN-SERVICE COST 100.00 COST OF REMOVAL 0.00  
 BOOK LIFE (YRS) 30 TAX LIFE (YRS) 15  
 CONSTRUCTION YEARS (10 MAX) 3 CAPITAL ESC RATE (%) 1.22  
 ANNUAL EXPEND (\$) 28 61 11 0 0 0 0 0  
 ELIGIBLE FOR CWIP 92.08 GENERATION PROJECT? (Y OR N) Y

AFUDC DATA (\$) COST  
 EQUITY 52.99 10.63  
 DEBT 47.01 4.64

FINANCIAL DATA (%) COST  
 PREFERRED STOCK 0.00 0.00  
 COMMON STOCK 52.99 10.63  
 DEBT 47.01 4.64  
 WEIGHTED AVERAGE COST OF CAPITAL 7.81

TAX RATES (%) GROSS RECEIPTS 00.00  
 INCOME AD-VALOREM 0.15 CAPITALIZED INT 4.64

INSURANCE RATE (%) 0.138

TAX DEPRECIATION METHOD -3- DEC BAL RATE -1.50-  
 1 = STRAIGHT LINE  
 2 = DECLINING BALANCE  
 3 = DECLINING SWITCH TO STRAIGHT LINE  
 4 = SUM OF YEARS DIGITS  
 5 = SUM OF YEARS DIGITS SWITCH TO STRAIGHT LINE  
 6 = ACCRELATED COST RECOVERY SYSTEM  
 7 = SINKING FUND

CONSTRUCTION PERIOD

YR	CONST BAL	DEBT	AFUDC	EQTY	AFUDC	ACCUM	CAP	INT	BASE	TAX DEFR	TAX DEFR	TAX PAID	DEBT RETN	EQTY RETN	ACCUM TAX	TAX PAID	REV REQ	DISC RATE	FV OF REV REQ	ACCUM FV OF REV REQ
1	27.72	0.02	0.06	0.09	0.09	0.64	25.75	-0.24	-0.24	1.45	0.56	1.21	0.56	1.45	0.77	1.21	2.98	1.162	3.47	3.47
2	88.84	0.10	0.27	0.46	3.38	82.97	-1.02	-1.26	4.67	1.81	4.21	4.21	1.81	4.21	1.33	4.21	9.67	1.078	10.43	13.90
3	100.00	0.09	0.23	0.78	5.65	94.03	-0.85	-2.11	2.65	1.03	2.71	2.71	1.03	2.71	1.33	2.71	5.54	1.000	5.54	19.44

IN-SERVICE PERIOD

YR	INVEST	BOOK	DEPR	INV	UNRCVD	TAX DEPR	TAX DEFR	TAX DEFR	TAX DEFR	ACCUM TAX	TAX DEFR	TAX PAID	DEBT RETN	EQTY RETN	ACCUM TAX	TAX PAID	REV REQ	DISC RATE	FV OF REV REQ	ACCUM FV OF REV REQ
1	100.78	100.78	1.68	2	105.65	5.28	1.41	-0.71	2.81	0.39	0.08	0.39	1.09	2.81	0.71	0.39	7.52	1.000	7.52	26.96
2	0.00	99.10	3.36	2	100.36	10.04	2.60	1.90	5.29	0.77	0.15	0.77	2.05	5.29	0.77	0.15	14.36	0.928	40.27	20.89
3	0.00	95.74	3.36	2	90.33	9.03	2.21	4.11	4.97	0.96	0.14	0.96	1.93	4.97	0.96	0.14	13.72	0.860	11.80	52.08
4	0.00	92.38	3.36	2	81.29	8.13	1.86	5.97	4.68	1.13	0.14	1.13	1.81	4.68	1.13	0.14	13.12	0.798	10.47	62.54
5	0.00	89.02	3.36	2	73.17	7.32	1.55	7.52	4.40	1.39	0.13	1.39	1.60	4.40	1.39	0.13	12.55	0.740	9.29	71.83
6	0.00	85.66	3.36	2	65.85	6.58	1.26	8.78	4.4	1.60	0.13	1.60	1.60	4.4	1.60	0.13	12.02	0.686	8.25	80.08
7	0.00	82.30	3.36	1	59.26	6.24	1.13	9.91	3.89	1.51	0.12	1.51	1.41	3.89	1.51	0.12	11.50	0.637	7.32	87.41
8	0.00	78.94	3.36	1	53.03	6.24	1.13	11.04	3.64	1.41	0.12	1.41	1.41	3.64	1.41	0.12	10.99	0.591	6.49	93.90
9	0.00	75.59	3.36	1	46.79	6.24	1.13	12.16	3.38	1.31	0.11	1.31	1.31	3.38	1.31	0.11	10.47	0.548	5.74	99.63





**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 14**

**Responding Witness: Charles R. Schram**

Q-14. Please provide the estimated fixed O&M for a new combustion turbine in 2010 dollars. Provide all workpapers, studies, analyses, and documents supporting and/or underlying this response.

---

A-14. In preparation for the Companies' 2008 Integrated Resource Plan ("IRP"), consultants Cummins and Barnard were commissioned to provide capital and operating cost estimates for a range of generation technologies. Their estimate of the fixed O&M cost for a new 155 MW combustion turbine was \$12/kW-year in \$2007 terms – equivalent to around \$13/kW-year in \$2010 terms. A copy of the 2008 IRP is provided in response to Question No. 16.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 15**

**Responding Witness: Charles R. Schram**

- Q-15. Please provide KU's required reserve margin for capacity planning. Provide all workpapers, studies, analyses, and documents supporting and/or underlying this response.
- 
- A-15. The KU/LG&E planning reserve margin is outlined in the 2008 Integrated Resource Plan ("IRP"). A copy of the 2008 IRP is provided in response to Question No. 16.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 16**

**Responding Witness: Lonnie E. Bellar/Charles R. Schram**

Q-16. Please provide a copy of KU's most recent integrated resource plan.

A-16. The most recent LG&E and KU Integrated Resource Plan was filed in Case No. 2008-00148. The filing is included on the attached CD in the folder titled Question No. 16.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 17**

**Responding Witness: Lonnie E. Bellar/ William Steven Seelye**

Q-17. Referring to the direct testimony of KU witness Seelye at 21:15 – 24:19:

- a. Explain in detail the rationale underlying KU's decision to consolidate Riders CSR1, CSR2, and CSR3.
- b. Explain in detail the rationale for the 200 MW total requirements limit in the Availability of Service section of Rider CSR.
- c. Explain in detail whether (and if so, why) KU would object to counting each called curtailment as a minimum 4-hour curtailment, even if canceled before the end of the 4-hour period.
- d. Explain in detail the rationale underlying the decision to split the 500 hours of total available curtailment into 100 hours of physical curtailment and 400 hours of curtailment with a buy-through option (buy-through curtailment). Provide all workpapers, studies, analyses, and documents supporting and/or underlying this response.
- e. Provide all workpapers, studies, analyses, and documents supporting and/or underlying KU's decision to price buy-through power using an automatic, formula-based mechanism.
- f. Identify all other utilities known to KU that have a formula-based pricing mechanism for buy-through power.
- g. Explain in detail why KU did not propose pricing buy-through power on the basis of market prices.
- h. Provide all workpapers, studies, analyses, and documents supporting and/or underlying the heat rate reflected in the proposed buy-through formula.
- i. Provide all workpapers, studies, analyses, and documents supporting and/or underlying the proposed 10-minutes notice in Rider CSR.

- j. Provide all documents relating to any customer comments and/or feedback that KU received regarding the proposed 10-minutes notice prior to KU's deciding to include this notice provision in Rider CSR.
  - k. Describe in detail conditions that will trigger KU's decision to call a buy-through curtailment.
  - l. Describe in detail conditions that will trigger KU's decision to call a physical curtailment.
- A-17.
- a. The Company is proposing to consolidate CSR1, CSR2, and CSR3 in order to offer a single curtailable service rider whose terms and conditions more accurately match the operating characteristics of a new combustion turbine which is assumed to be avoided by curtailable service. The three riders with widely varying parameters cannot individually meet that goal.
  - b. The 200 MW limit has long term planning implications. Since customers have the ability to exit the CSR, the Company must consider the extended time horizon for planning and constructing generation resources. For example, a higher CSR limit could pose a risk if customers decided to exit curtailable service, since the Company would be required to provide additional supply without sufficient planning and construction timelines.
  - c. KU would object to counting each curtailment as a minimum 4-hour curtailment, even if canceled before the end of the 4-hour period, because the need to curtail does not always last for 4 hours. If 4 hours is counted for each curtailment then value is being removed from other customers as explained in the answer to KIUC 1-11.
  - d. There was no detailed analysis. The new CSR is the result of internal discussion to simplify the process for all existing participating industrials. The 100 hours of curtailment requests may be issued to ensure adequate reserve supply for reliable operations during peak conditions, (to avoid the need to buy power or build future generation). The 400 hours of curtailment requests with buy through gives the customer the opportunity to buy through at current gas prices and CT heat rates, the value of which is included in the monthly FAC thus lowering the cost of energy to all customers. If the customer elects not to buy through then excess supply above reserves is available to make off system sales, (the profit of which is included in the revenue requirements of LG&E/KU in rate making).
  - e. There are no work papers. The business reasons for this approach were ease of implementation for the companies and to provide price transparency for the customer.

- f. KU has not researched what other utilities offer for curtailable service.
  - g. See answer to “e” above.
  - h. While no studies were performed, the heat rate in the proposed buy through formula corresponds to the heat rate of several of the Companies’ combustion turbines.
  - i. There are no workpapers. The 10-minute notice corresponds to the start-up capability for a quick start combustion turbine.
  - j. Please see the response to PSC-2 Question No. 97.
  - k. Curtailment requests under CSRs are issued at KU’s sole discretion for reliability and/or economic reasons.
- 
- l. See answer “k” above.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 18**

**Responding Witness: Charles R. Schram**

- Q-18. If KU were able to interrupt a CSR customer's load instantaneously, would that customer's curtailable load be more valuable to KU than load that is curtailable only with a longer notice? Please explain the response in detail.
- 
- A-18. In today's electric industry, there is no quantifiable benefit for having less than a 10-minute curtailment notice.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 19**

**Responding Witness: William Steven Seelye**

Q-19. Referring to witness Seelye's statement regarding why Rider CSR's 10-minute notice is consistent with the requirement for using capacity as spinning reserves (direct at 24:1-4):

- a. Explain in detail what is meant by this testimony.
  - b. Define *spinning reserves*, describe and discuss how KU's spinning reserves requirement is determined, and describe whether and how KU could use 10-minute (or less) curtailable load to meet its spinning reserve requirement?
- A-19. a. NERC Standards require an electric system that loses supply to recover in 15 minutes. For a resource to be of any value in the management of generation resource loss recovery it must respond in the 15 minute period. It normally takes the system operational personnel 3 to 5 minutes to evaluate and execute a mitigation plan. Therefore a resource must be fully deployed in 10 minutes.
- b. The NERC definition of Spinning Reserves is: "Unloaded generation that is synchronized and ready to serve additional demand." Spinning reserve is part of contingency reserves. Contingency reserves are used to comply with NERC Disturbance Control Standards. NERC does not define a specific amount of spinning reserve required in contingency reserves. The required amount of contingency reserves and the amount of spinning reserves are defined in the CRSG documents provided under question KIUC 1-7.

To be clear, KU can only use 10 minute curtailable load if it is certain that such load will be available to be curtailed during some future loss of supply. Due to the lack of certainty of curtailable load being available at some future time it cannot be used for contingency reserves. Although a 10-minute notice of curtailment is important to the Company in the management of generation resource loss recovery, curtailable power is not of equal value to a quick-start combustion turbine in terms of meeting contingency reserve requirements.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 20**

**Responding Witness: Lonnie E. Bellar/Charles R. Schram/ William Steven Seelye**

Q-20. Referring to existing Riders CSR1, CSR2, and CSR3:

- a. Does KU only provide buy-through power under Riders CSR1 and CSR2 through market purchases?
- b. Explain in detail how KU makes market purchases for buy-through power (including descriptions of products purchased), and whether such purchases are only available in take-or-pay blocks.
- c. If the answer to subpart (a) above is no, identify the other source(s) of energy used to supply buy-through power and explain in detail how KU prices such energy and conveys these prices to customers.
- d. If KU supplies energy to meet buy-through loads from system generating resources, explain in detail why energy from system resources should be priced on a take-or-pay basis.
- e. Explain in detail how KU notifies a customer about a buy-through curtailment and the price of energy for buy-through.
- f. Is the buy-through price quoted to a customer at the time of a curtailment notice the final price that the customer is charged for any buy-through power purchased? If the answer is anything but an unequivocal yes, please explain how the final purchase price is determined and when that price is conveyed to the curtailment customer.
- g. Provide all workpapers, studies, analyses, and documents supporting and/or underlying the \$16 per kW Non-Compliance Charge.

A-20. a. Yes for CSR1. There are no customers under CSR2.

b. Buy throughs are provided by buying the exact amount required for the

customer for the expected period of curtailment. This is accomplished in a fixed odd lot purchase. While the purchases that the Company makes to supply buy-through power are technically not take or pay, once the customer elects to buy through, the Company *commits* to a purchase on behalf of the customer and the customer has to take or pay for the power purchased. This ensures that other customers do not have to bear the cost of purchase power not taken by the curtailed customer.

- c. Not applicable.
- d. KU does not supply energy to meet buy through loads from system generating resources.
- e. System operation personnel survey the market for the best price for an expected odd lot volume of energy and also checks for transmission availability. Next system operation personnel contact the customer by phone at least 20 minutes in advance of the curtailment to inform the customer of the start time of the curtailment and to inquire if the customer wishes to buy through if power and transmission is available. Next the customer needs to immediately inform system operation personnel if they wish to buy through. Any delay in a decision by the customer could result in the power and transmission not being available minutes later.
- f. No. The process is described in answer “e” above. On a few occasions, it should be noted that after the customer agrees to a buy through and then system operation personnel execute the purchase of an odd lot of power with a supplier the price may have lowered. In such cases the lower price is used to bill the customer for the buy through. If the price at the time of execution of a purchase from a supplier is higher, the higher price is communicated back to the customer and the customer must state agreement promptly if they wish for the system operation personnel to execute the purchase.
- g. The \$16 per kW Non-Compliance Charge was introduced in the proposed CSR rates filed in Case No. 2003-00434 and reflected approximately 4 months of the \$4.19/kW primary voltage credit proposed in that proceeding. See page 45 of Mr. Seelye's direct testimony in Case No. 2003-00434. Although the Company is not proposing to increase the Non-Compliance Charge in this proceeding, 4 months of the \$5.20/kW primary voltage credit would result in a Non-Compliance Charge of approximately \$21.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 21**

**Responding Witness: Lonnie E. Bellar/ William Steven Seelye**

Q-21. Please provide all schedules and underlying computations and workpapers supporting the Company's requested electric rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the revenue requirement components and adjustments and the cost of service model.

A-21. The requested information is being provided on the attached CD in the folder titled, Question No. 21.

Also see responses to the following: KU PSC-2 Question No. 77, AG-1 Question No. 217, AG-1 Question No. 218, AG-1 Question No. 229, AG-1 Question No. 230, AG-1 Question No. 250, and AG-1 Question No. 258



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 22**

**Responding Witness: William Steven Seelye**

- Q-22. To the extent not provided in response to the Data Request No. 1 above, please provide an electronic copy (on diskette or CD) of each of Mr. Seelye's exhibits. Please include all work papers and supporting documentation used and relied upon by Mr. Seelye in the preparation of these exhibits. Provide all electronic spreadsheets with cell formulas intact. If there is an objection to providing a spreadsheet with cell formulas intact, please provide a copy of the spreadsheet with formulas replaced with values.
- A-22. See response to Question No. 21.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 23**

**Responding Witness: William Steven Seelye**

Q-23. If not provided in response to a previous request, please provide (in electronic form, with formulas intact) all work papers, analyses, etc. supporting the development of the zero-intercept calculations as used by Mr. Seelye in the BIP cost of service study. Also include all statistical analyses performed.

---

A-23. See response to Question No. 21.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 24**

**Responding Witness: William Steven Seelye**

Q-24. Did the Company prepare any other class cost of service studies (whether or not ultimately used by the Company for any purpose), beyond the BIP study presented in its filing? If so, please identify the type of study prepared, list the differences between such study and the BIP study filed in this case and provide a copy of the study, including all supporting workpapers.

A-24. No.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 25**

**Responding Witness: Counsel**

Q-25. Did the Company consider, but not prepare, any other class cost of service study beyond the BIP study filed in this case? If so, please identify the type of study and list the differences between such study and the BIP study filed in this case.

---

A-25. All decisions regarding which adjustments to include in the application in this proceeding were made in consultation with legal counsel. Any response to this question necessarily requires the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 26**

**Responding Witness: William Steven Seelye**

Q-26. Please provide for each cost of service rate class, the rate class monthly CP kW demand data for each month of the test year (i.e., each rate class or special contract that is separately included and analyzed in the Company's cost of service model, whether presented as a separate class or not in the Company's filing.

---

A-26. See response to Question No. 21.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 27**

**Responding Witness: William Steven Seelye**

- Q-27. Please provide a description of the methodology used by the Company to reflect interruptible load in the development of each of the “demand allocators” used in the cost of service study. Also provide all workpapers supporting the calculations, adjustments, etc. that were made to reflect interruptible load. Please identify, by retail rate schedule (as used in the cost of service study) the amount of interruptible or curtailable load. For each such rate schedule, provide the NCP, NCPP, SICD, SCP, WCP and BDEM associated with interruptible or curtailable load.
- A-27. The interruptible customers’ actual demands were reflected in each demand allocator. See response to Question No. 21.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 28**

**Responding Witness: William Steven Seelye**

Q-28. Please provide schedules showing the loss factors by voltage level for each rate class used to adjust energy and demands from metered levels.

---

A-28. See response to Question No. 21.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 29**

**Responding Witness: William Steven Seelye**

Q-29. Please provide any analyses or workpapers which attempt to quantify the impact of a more normal summer peak (compared to the actual winter peak) on the rates of return in the class cost of service study.

---

A-29. Actual demands were utilized and no studies were performed to normalize summer or winter peak demands.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 30**

**Responding Witness: William Steven Seelye**

Q-30. Please provide, in electronic format, hourly system loads (combined LG&E-KU) for the most recent 5 years available.

~~A-30. The requested information is included on the attached CD in folder titled, Question No. 30.~~



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 31**

**Responding Witness: William Steven Seelye**

Q-31. Please provide the class contributions to the monthly system peaks for each month of the most recent 5 year period available.

---

A-31. The Company is providing the requested information for the twelve-month periods ending April 2008 and October 2009, which can be found on the attached CD in folder titled, Question No. 31. The requested information for periods other than those included in the response does not exist, since the information is only prepared in connection with a base rate case filing. Providing the information for periods other than the two latest test years would require a significant amount of original work.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 32**

**Responding Witness: William Steven Seelye**

Q-32. For each of the rate schedules TODS, TODP, LTOD, and RTS, please provide the billings under present and proposed rates for each individual customer for the test year, with identifying information removed.

---

A-32. The Company has not prepared an analysis to calculate billings under present and proposed rates for each individual customer under the referenced rate schedules.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 33**

**Responding Witness: William Steven Seelye**

Q-33. If for any reason the Company does not provide the information requested in the previous request, please provide the highest and lowest increase individual customer increases, and a histogram showing the number of customers receiving increases at varying levels between the highest and lowest, for each of the rate schedules TODS, TODP, LTOD, and RTS.

A-33. The Company has not prepared the requested analysis.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 34**

**Responding Witness: William Steven Seelye**

Q-34. If not previously provided, please provide all workpapers supporting the development of the billing demands under proposed rates for rate schedules TODS, TODP, LTOD, and RTS.

---

A-34. See response to Question No. 21.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 35**

**Responding Witness: William E. Avera**

Q-35. Please provide all work papers and supporting documentation used by Dr. Avera in the preparation of his Direct Testimony and exhibits. Please provide all spreadsheets with cell formulas intact. Please provide all data that support his quantitative analyses.

---

A-35. Please refer to the response to AG-1 Question No. 190.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 36**

**Responding Witness: William E. Avera**

Q-36. Please provide copies of all articles and reports referenced and cited by Dr. Avera in his Direct Testimony.

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A-36. Please refer to response to AG-1 Question No. 190.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 37**

**Responding Witness: Daniel K. Arbough**

Q-37. Please provide copies of all bond rating and corporate credit rating reports (Moody's, Standard & Poor's, Fitch) for Kentucky Utilities for the years 2007 through 2010.

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A-37. Please refer to the response to AG-1 Question No. 184.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 38**

**Responding Witness: William E. Avera**

Q-38. Please provide copies of all regulatory commission orders (FERC and state) cited and referred to by Dr. Avera in his Direct Testimony.

~~A-38. See response to KPSC-2 Question No. 62 and Question No. 63. All other regulatory commission orders are publicly available from the respective agencies.~~



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 39**

**Responding Witness: S. Bradford Rives**

Q-39. Please provide all supporting documentation, analyses, and spreadsheets that support KU's requested capital structure in this proceeding.

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A-39. See the response to Question No. 21.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 40**

**Responding Witness: Paul W. Thompson/Shannon L. Charnas**

Q-40. Refer to page 8 lines 14-18 of Mr. Thompson's Direct Testimony.

- a. Please provide KU's share of the EEI income for each of the last five calendar years and the twelve months ending October 2009.
- b. Provide the account to which KU books its share of the EEI income.

A-40. a. KU's share of the EEI income was as follows:

2005	\$ 2,256,843
2006	\$29,405,773
2007	\$26,358,781
2008	\$29,548,519
Test Year Ended	
10/31/09	\$ 2,854,702
2009	\$ 765,782

- b. The earnings are recorded to the FERC account 418, other income.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 41**

**Responding Witness: Paul W. Thompson**

Q-41. Refer to page 8 lines 18-20 of Mr. Thompson's Direct Testimony.

- 
- a. Please describe the referenced "long-standing agreement" in greater detail, including the seller and terms of the purchase.
  - b. Please provide a copy of this agreement.
  - c. Please provide the date when KU commenced taking power under this agreement.

A-41. (a-c).

The documents requested are on the attached CD in folder titled Question No. 41. In 1960, KU and OMU entered into a Contract whereby the parties agreed to share the costs related to the construction and operation of an additional generating unit at the Elmer Smith Generating Station ("ESGS") in Owensboro. At the time, OMU's generation of energy at ESGS was no longer adequate to supply the City and its inhabitants with electric light, heat and power, and OMU partnered with KU to construct units larger than required to meet the electricity needs of OMU's native customers. The construction of larger units provided economies of scale that would result in lower costs for electricity for Owensboro's consumers. KU, in turn, received the contractual entitlement to the "surplus electric capacity and energy generated" by the units in excess of OMU's native load requirements.

The specific terms of the parties' relationship were spelled out in the 1960 Contract, and then amended and/or supplemented several times over the next 40 years (herein collectively referred to as the "Contract"). The 1960 Contract contemplated the future construction of a generating unit in addition to the first unit of Station 2. The second unit was constructed through similar partnership efforts of KU and OMU in 1974. As with the construction of the first unit, KU assisted in the financing of the construction of Unit 2 in return for a contractual

right to the portion of the capacity and energy generated at Units 1 and 2 not needed to serve OMU's native load. The 1960 Contract, along with key amendments / supplementations, is included on the CD.

The 1960 Contract was the subject of significant litigation between KU and OMU in the United States District Court for the Western District of Kentucky at Owensboro for several years. Relevant to the end date of the contract, that Court twice ruled that OMU had the right under the Contract to terminate without cause upon 4 years' notice. Accordingly, OMU issued notice in 2006 and the Contract will end on May 16, 2010.

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**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 42**

**Responding Witness: Chris Hermann**

Q-42. Refer to page 15 lines 15-21 of Mr. Hermann's Direct Testimony.

- a. Please provide a copy of the Company's Vegetation Management Plan.
- b. Please provide a copy of all analyses performed by or on behalf of the Company and/or in the Company's possession that compares cycle-based vegetation management to the multi-cycle strategy and the related flexibility of such a strategy.

A-42. a. The Company's most recent Vegetation Management Plan is attached.

- b. The Companies' multi-cycle strategy incorporates schedules and priorities for tree trimming that are based on vegetation growth, cycle-last trim date, reliability data, and visual inspections. The plan includes the application of mid-cycle trimming to focus on specific fast growing and hazard trees on multi-phase lines where more customers are impacted by outages. The Companies' plan is to maintain a proactive trim cycle while balancing the reactive needs of worst performing circuits. The Companies' goal is to maintain an average trim cycle of five years or less. All tree-trimming is governed by approved principles of modern arboriculture and adheres to International Society of Arboriculture (ISA) standards. Other standards utilized in the program include ANSI A300, NESC, and OSHA 1910.269 as well as compliance with tree ordinances and local codes. Analysis performed by or on behalf of the Company comparing cycle-based vegetation management (trimming all circuits on a specified annual cycle) to a multi-cycle strategy (a combined strategy of cycle-based with a mid-cycle sweep on major feeder circuits to address fast growing trees) is not available. The current multi-cycle strategy approach has evolved over time from experience and sharing of industry practices through various professional contacts including the International Society of Arboriculture and the Utility Arborist Association.



Mr. Jim Welch  
Director of Engineering  
Kentucky Public Service Commission  
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December 19, 2007

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**RE: An Investigation of the Reliability Measures of Kentucky's Jurisdictional Electric Distribution Utilities and Certain Reliability Maintenance Practices- Administrative Case 2006-00494**

Dear Mr. Welch:

Enclosed please find Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company's ("KU") Vegetation Management Plan pursuant to the Commission's Order dated October 26, 2007 in the above mentioned matter.

Should you have any questions concerning the enclosed, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick E. Lovekamp", written over a horizontal line.

Rick E. Lovekamp

**Louisville Gas and Electric Company  
and  
Kentucky Utilities Company**

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**Distribution Vegetation Management Plan**

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## **Table of Contents**

Introduction.....	3
Safety .....	3
Right of Way Maintenance Strategy.....	3
Reliability Criteria and Reports .....	4
Work Plan .....	4
Evaluation of Plan Effectiveness .....	5
Customer Communication .....	5
Contractor Performance Management .....	5

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## **Introduction**

The Distribution Vegetation Management Program encompasses right of way maintenance for Louisville Gas and Electric Company and Kentucky Utilities Company (referred to as the “Companies”). The program is centralized and managed by a Forestry Manager and nine company Utility Arborists. All are certified arborists by the International Society of Arboriculture. The Companies employ five professional tree contractor companies (Asplundh, Nelson, Phillips, Townsend and Wright). Utility line clearing is undertaken to maintain safety, reliability of service, and access to the utility’s facilities for maintenance and repair.

## **Safety**

The Companies primary focus and core value is to ensure the health and safety of our employees, business partners, and the public. The policies, procedures, and goals contained in the Companies’ *No Compromise Plan* support our current operating and safety commitments. Contractors shall regard safety as their first priority. Contractors and their employees will recognize and follow all laws, rules and regulations regarding public and worker safety. Any incident must be reported to the appropriate safety consultant immediately. Tree Trimming Contractors are held accountable for safety per OSHA and Company standards. Every new contract employee must complete a safety training program in the first 30 days. Safety performance is also included in the contractor evaluation.

## **Right of Way Maintenance Strategy**

The Companies employ an Integrated Vegetation Management Program (IVM) that is the process of using chemical, manual, or mechanical techniques to control undesirable vegetation and includes natural or directional pruning, environmentally safe herbicides, and tree removals. The program includes flexibility to operate and maintain variable easement widths, differences between rural and urban service areas, applicable codes or ordinances, and the need to maintain some level of flexibility in addressing landowner requests or concerns. Schedules and priorities for tree trimming are based on vegetation growth, cycle-last trim date, reliability data, and visual inspections. Reliability centered maintenance concepts are also employed in establishing tree trimming priorities.

The plan includes the application of a flexible multi-cycle strategy to address growth and tree density which will vary across the service area. The Companies’ plan is to maintain a proactive trim cycle while balancing the reactive needs of worst performing circuits. The Companies’ goal is to maintain an average trim cycle of five years or less.

All tree trimming shall be governed by approved principles of modern arboriculture and shall adhere to International Society of Arboriculture (ISA) standards. Other standards utilized in the program include ANSI A300, NESC, and OSHA 1910.269 as well as compliance with tree ordinances and local codes.

***Reliability Criteria and Reports***

The reliability criteria used to develop the vegetation management plan are system SAIDI, SAIFI, and CAIDI. System performance targets are established annually. Reports used to develop the plan include the Worst Performing Circuit Report and Circuit SAIDI, SAIFI, and CAIDI Reports.

The Annual Reliability Report will include the Worst Performing Circuits and how well the Companies implemented its vegetation plan as well as changes to the plan in the coming year.

---

***Work Plan***

Work plans are prepared annually by circuit based on vegetation growth, cycle-last trim date, reliability data, and visual inspections by arborists who develop work plans to target trees that need to be trimmed or removed as well as the flexibility to prescribe a different trim cycle by circuit that addresses growth and tree density for that circuit. A mid-cycle “touch up” is used as needed based on field inspections for multi-phase lines. The vegetation plan strategy will balance the routine trimming plan to maintain an average trim cycle with the reliability centered maintenance plan to address the worst performing circuits. The top 10 worst performing circuits are identified by each reliability index. These circuits are evaluated to determine root cause of the outages. If the root cause is tree related, the arborist will visually inspect the circuit to determine the appropriate plan of action.

The Work Plan includes the following sections:

Routine Trimming Cycle Plan

The routine trimming cycle plan is a proactive plan to trim circuits based on the date last trimmed.

Mid-Cycle Touch Up Plan

The mid-cycle touch up plan focuses on specific fast growing and hazard trees on multi-phase lines.

Herbicide Treatment Plan

The herbicide plan is a proactive plan to control brush and immature trees.

Worst Performing Circuits Plan

The worst performing circuit plan is a reactive plan that has identified trees as the root cause of poor performance and is recommended by the arborist after inspection to be included in the tree work plan.

---

## **Evaluation of Plan Effectiveness**

The effectiveness of the plan is evaluated by the cycle, system performance as measured by system SAIDI, SAIFI and CAIDI, and customer feedback as measured by satisfaction surveys. Reports used to monitor the plan effectiveness include the Circuit Reliability Report, System SAIDI, SAIFI, and CAIDI Reports, and Customer Satisfaction Surveys.

## **Customer Communication**

Each customer on the circuit receives a mailing notification letter, one to two weeks prior to beginning the circuit work. The crew “knocks on the door” before the work begins. Customer complaints are investigated. Customer satisfaction is included in the contractor evaluation. Customer education about tree trimming and planting trees is provided in consumer mail inserts, participation in community events, and media announcements.

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## **Contractor Performance Management**

The vegetation management strategy includes target pricing and firm bid work. Target pricing promotes efficiency in contractor resource management. The target price strategy deploys prescriptive tree management techniques. All trees and brush are planned, counted, and marked on a circuit map, span by span. Contractor work is prescribed and a target price is established for the work. Every circuit is inspected after the tree work is complete. Approximately 8 to 10 percent of the tree work is bid on a firm basis to validate target pricing and encourage contractor competition.

Contractor’s performance is evaluated based on safety, productivity, quality, and customer satisfaction on a quarterly and annual basis. Contractors are held accountable for safety per OSHA and Company standards.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 43**

**Responding Witness: Valerie L. Scott**

Q-43. Refer to page 7 lines 1-10 of Ms. Scott's Direct Testimony.

- a. Please describe how the Company accounts for storm damage costs in the first instance. For example, does it charge the entirety of the costs to expense accounts or does it charge some to expense and some to plant?
- b. For the September 2008 windstorm, please provide the amount that was charged to expense by month prior to the test year; the amount, if any, charged to expense by month in the test year; the amount charged to plant by month prior to the test year; and the amount charged to plant by month in the test year.
- c. Does the regulatory asset reflect only the expense component of the storm costs or does it also include some plant costs?

A-43. a. The Company charges storm costs to either expense or capital accounts depending on the nature of the charge as it is incurred.

b. See attachment.

c. The 2008 wind storm regulatory asset reflects the expense component of the storm excluding normal costs. Capital costs are excluded from the regulatory asset.

**Kentucky Utilities Company**  
**September 2008 Windstorm Costs**

	Costs Recorded Prior to Test Year		Costs Recorded During Test Year					Total		
	SEP-2008	OCT-2008	TOTAL	NOV-2008	DEC-2008	JAN-2009	FEB-2009		MAR-2009	APR-2009
(\$ in thousands)										
Amount Charged to Capital	896	503	1,399	(49)	110	2	18	2	-	83
Amount Charged to Expense	2,696	350	3,046	(178)	351	-	-	7	1	181

	<u>Total Costs</u>
(\$ in thousands)	
Amount Charged to Capital	1,482
Amount Charged to Expense	3,227



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 44**

**Responding Witness: Valerie L. Scott**

Q-44. Refer to page 5 lines 1-7 of Ms. Charnas' Direct Testimony.

- a. Please identify, describe and quantify all one-time implementation costs for the CCS that were expensed during the test year. Provide this information by FERC expense account to the extent it is available at this level of detail.
- b. Does the Company agree that such one-time implementation costs are not recurring?
- c. Please identify, describe and quantify all annual savings that will result from the implementation of the CCS. Provide all assumptions, data, computations and electronic spreadsheets with formulas intact.
- d. Please identify and quantify the savings that were achieved from the implementation of the CCS during the test year. Provide all assumptions, data, computations and electronic spreadsheets with formulas intact.
- e. Please describe the retirement of the previous application, the date it was retired, the plant account from which it was retired, the gross plant amount that was retired, and the net plant amount that was retired.

- A-44. a. One-time implementation costs for CCS that were expensed during the test year were as follows:

Type of Cost	Account	Amount
Outside Services	910001	\$ 1,256,656
Meals	426501	6,506
Meals	910001	26,388
Meals	921903	148
Employee Moving Expense	426501	3,380
Tuition Reimbursement	926001	4,985
Travel	910001	57,072
Travel	921903	206
Miscellaneous Expenses	910001	3,087
Miscellaneous Expenses	426501	180
Total		<u>\$ 1,358,608</u>

- b. While, the one-time implementation cost is non-recurring, on-going costs will exceed the costs incurred during the test period. See the responses to Question No. 44 (c) and (d) below.
- c. A net reduction in expenses was not expected in the organization. Cost savings associated with the retirement of the mainframe computing platform are offset by the payment of license fees for the new software and support. Please see attached on CD in the folder titled Question No. 44.
- d. A net reduction in expenses was not expected or realized during the test year in the Information Technology departments. Please see attached on CD in the folder titled Question No. 44.
- e. Prior to the merger with LG&E in 1998, KU expensed software, including its original legacy system. Therefore, there was no gross or net plant amount to be retired related to the original legacy system. Beginning with the merger with LG&E in 1998, KU capitalized software assets, consistent with LG&E. Retirements of minor enhancements that were capitalized subsequent to 1998 occurred as the enhancements became fully depreciated.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 45**

**Responding Witness: Ronald L. Miller**

Q-45. Refer to page 2 line 10 through page 3 line 2 of Mr. Miller's Direct Testimony.

- 
- a. When will the Company recognize the coal tax credit for 2009 on its accounting books?
  - b. Please provide the amount of the coal tax credit for 2009 that will be recognized on the Company's accounting books in 2010, if any, separated into the portion used as a credit against the Kentucky state income tax and the portion used as a credit against property taxes.
  - c. Please confirm that the Company agrees that the coal tax credit to the Kentucky state income tax must be grossed-up to quantify the revenue requirement effect of either including or excluding this adjustment.

- A-45.
- a. The Company will recognize the coal tax credit for 2009 on its accounting books in 2010.
  - b. The Company will recognize \$5,555,186 of coal tax credit for 2009 and is expecting to use the entire amount as a credit against property taxes.
  - c. To the extent the coal tax credit is being used to reduce property taxes, the Company does not believe the coal tax credit must be grossed-up to quantify the revenue requirement effect of either including or excluding this adjustment.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 46**

**Responding Witness: Ronald L. Miller**

Q-46. Refer to page 3 lines 3-15 of Mr. Miller's Direct Testimony.

- a. Please provide a copy of all studies, analyses, and/or all other documentation that addresses the availability of the \$2 per ton credit for eligible Kentucky coal purchases for new clean coal facilities.
- b. Please provide a copy of all applications and/or other correspondence with any state agency addressing the availability and/or amount of the \$2 per ton credit for eligible Kentucky coal purchases for new clean coal facilities.
- c. Please indicate whether the Company is aware of any reason why it would not obtain the \$2 per ton credit for eligible Kentucky coal purchases for new clean coal facilities.

- A-46.
- a. There are presently no internal studies, analyses, or other documentation by the Company addressing the availability of the credit. Attached is a copy of the Kentucky Revised Statute – KRS § 141.428 Kentucky Clean Coal Incentive Act.
  - b. The Company has not filed an application for the Kentucky Clean Coal Incentive tax credit. The Company has made informal inquiries with state representatives regarding the certification process. Based on these inquiries, we believe there have been no other applicants for this credit, and consequently, no certification process is in place. We were invited to formally contact the state to determine eligibility and plan to do so prior to Trimble County 2 going in service in mid 2010.
  - c. As discussed in (b) above, there is currently no established qualification criteria or procedures for certification. Due to this uncertainty, the Company is unsure at this time whether it will be eligible for the credit.

**KRS § 141.428**

**141.428 Kentucky Clean Coal Incentive Act; definitions; tax credit; administrative regulations**

(1) As used in this section:

- (a) “Clean coal facility” means an electric generation facility beginning commercial operation on or after January 1, 2005, at a cost greater than one hundred fifty million dollars (\$150,000,000) that is located in the Commonwealth of Kentucky and is certified by the Environmental and Public Protection Cabinet as reducing emissions of pollutants released during generation of electricity through the use of clean coal equipment and technologies;
- (b) “Clean coal equipment” means equipment purchased and installed for commercial use in a clean coal facility to aid in reducing the level of pollutants released during the generation of electricity from eligible coal;
- (c) “Clean coal technologies” means technologies incorporated for use within a clean coal facility to lower emissions of pollutants released during the generation of electricity from eligible coal;
- (d) “Eligible coal” means coal that is subject to the tax imposed under KRS 143.020;
- (e) “Ton” means a unit of weight equivalent to two thousand (2,000) pounds; and
- (f) “Taxpayer” means taxpayer as defined in KRS 131.010(4).

(2) Effective for tax years ending on or after December 31, 2006, a nonrefundable, nontransferable credit shall be allowed for:

- (a) Any electric power company subject to tax under KRS 136.120 and certified as a clean coal facility or any taxpayer that owns or operates a clean coal facility and purchases eligible coal that is used by the taxpayer in a certified clean coal facility; or
- (b) A parent company of an entity identified in paragraph (a) of this subsection if the subsidiary is wholly owned.

(3) (a) The credit may be taken against the taxes imposed by:

1. KRS 136.070;
2. KRS 136.120; or
3. KRS 141.020 or 141.040, and 141.0401.

- (b) The credit shall not be carried forward and must be used on the tax return filed for the period during which the eligible coal was purchased. The Environmental and Public Protection Cabinet must approve and certify use of the clean coal equipment and technologies within a clean coal facility before any taxpayer may claim the credit.
- (c) The credit allowed under paragraph (a) of this subsection shall be applied both to the income tax imposed under KRS 141.020 or 141.040 and to the limited liability entity tax imposed under KRS 141.0401, with the ordering of credits as provided in KRS 141.0205.
- (4) The amount of the allowable credit shall be two dollars (\$2) per ton of eligible coal purchased that is used to generate electric power at a certified clean coal facility, except that no credit shall be allowed if the eligible coal has been used to generate a credit under KRS 141.0405 for the taxpayer, a parent, or a subsidiary.
- (5) Each taxpayer eligible for the credit provided under subsection (2) of this section shall file a clean coal incentive credit claim on forms prescribed by the Department of Revenue. At the time of filing for the credit, the taxpayer shall submit an electronic report verifying the tons of coal subject to the tax imposed by KRS 143.020 purchased for each year in which the credit is claimed. The Department of Revenue shall determine the amount of the approved credit and issue a credit certificate to the taxpayer.
- (6) Corporations and pass-through entities subject to the tax imposed under KRS 141.040 or 141.0401 shall be eligible to apply, subject to the conditions imposed under this section, the approved credit against its liability for the taxes, in consecutive order as follows:
- (a) The credit shall first be applied against both the tax imposed by KRS 141.0401 and the tax imposed by KRS 141.020 or 141.040, with the ordering of credits as provided in KRS 141.0205;
- (b) The credit shall then be applied to the tax imposed by KRS 136.120.

The credit shall meet the entirety of the taxpayer's liability under the first tax listed in consecutive order before applying any remaining credit to the next tax listed. The taxpayer's total liability under each preceding tax must be fully met before the remaining credit can be applied to the subsequent tax listed in consecutive order.

- (7) If the taxpayer is a pass-through entity not subject to tax under KRS 141.040, the amount of approved credit shall be applied against the tax imposed by KRS 141.0401 at the entity level, and shall also be distributed to each partner, member, or shareholder based on the partner's, member's, or shareholder's distributive share of the income of the pass-through entity. The credit shall be claimed in the same manner as specified in subsection (6) of this section. Each pass-through entity shall notify the Department of Revenue electronically of all partners, members, or shareholders who may claim any amount of the approved credit. Failure to provide information to the Department of

Revenue in a manner prescribed by regulation may constitute the forfeiture of available credits to all partners, members, or shareholders associated with the pass-through entity.

- (8) The taxpayer shall maintain all records associated with the credit for a period of five (5) years. Acceptable verification of eligible coal purchased shall include invoices that indicate the tons of eligible coal purchased from a Kentucky supplier of coal and proof of remittance for that purchase.
- (9) The Department of Revenue shall develop the forms required under this section, specifying the procedure for claiming the credit, and applying the credit against the taxpayer's liability in the order provided under subsections (6) and (7) of this section.
- (10) The Governor's Office of Energy Policy, Environmental and Public Protection Cabinet, and the Department of Revenue shall promulgate administrative regulations necessary to administer this section.

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(11) This section shall be known as the Kentucky Clean Coal Incentive Act.

HISTORY: 2007 2nd ex s, c 1, § 28, eff. 8-30-07; 2006 1st ex s, c 2, § 35, eff. 6-28-06; 2005 c 168, § 142, eff. 3-18-05

**Legislative Research Commission Note (6-28-06):** 2006 (1st Extra. Sess.) Ky. Acts ch. 2, sec. 73, provides that “unless a provision of this Act specifically applies to an earlier tax year, the provisions of this Act shall apply to taxable years beginning on or after January 1, 2007.”

**Legislative Research Commission Note (3-18-05):** 2005 Ky. Acts ch. 168, sec. 165, provides that this section shall apply to tax years beginning on or after January 1, 2005.

**Legislative Research Commission Note (3-18-05):** 2005 Ky. Acts chs. 11, 85, 95, 97, 98, 99, 123, and 181 instruct the Reviser of Statutes to correct statutory references to agencies and officers whose names have been changed in 2005 legislation confirming the reorganization of the executive branch. Such a correction has been made in this section.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 47**

**Responding Witness: Ronald L. Miller**

Q-47. Refer to page 6 lines 8-18 of Mr. Miller's Direct Testimony.

- 
- a. Please describe how the Company books the Advanced Coal Investment Tax Credit. For example, is it based on the tax basis of construction expenditures through the end of each month?
- b. Please indicate if there is a lag in the cash realized from the Advanced Coal Investment Tax Credit compared to the accrual on the Company's accounting books. Please explain.

- A-47. a. The Advanced Coal Investment Tax Credit (ACITC) is recorded quarterly based on eligible progress construction expenditures through the end of that quarter. Total expenditures incurred are multiplied by the fifteen percent ACITC rate. Amounts estimated for financial statement purposes are adjusted to the actual amounts included on the completed tax return.
- b. No, there is no significant lag in the cash realized from the Advanced Coal Investment Tax Credit (ACITC) as these benefits are incorporated into quarterly estimated payments due from the Company. Quarterly estimated payments/settlements are made in April, June, September, and December.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 48**

**Responding Witness: Daniel K. Arbough**

- Q-48. Please provide a five year monthly history (2005-2009) of the average daily balances of short term debt by type of short term debt security and/or source (bank loans, commercial paper, money pool, receivables financing, etc.), the average interest rate for each month by type of short term debt and/or source, and the basis for the interest rate for each month by type of short term debt and/or source.
- 
- A-48. Attached is a five year monthly history (2005-2009) of the average daily balances of short term debt. During this period Kentucky Utilities Company's short-term debt has been sourced through a Money Pool agreement. The daily outstanding balance of all short term loans accrues interest at the rate for high-grade unsecured 30-day commercial paper of major corporations sold through dealers as quoted in The Wall Street Journal (the "Average Composite") on the last business day of the prior calendar month.

Month/Year	Average Daily Balance	Average Interest Rate
January-05	\$26,587,187.50	2.340%
February-05	\$22,377,241.38	2.500%
March-05	\$7,465,312.50	2.650%
April-05	\$8,442,741.94	2.780%
May-05	\$8,318,593.75	2.980%
June-05	\$62,021,129.03	3.060%
July-05	\$40,323,750.00	3.270%
August-05	\$12,323,125.00	3.430%
September-05	\$10,620,967.74	3.640%
October-05	\$21,761,406.25	3.790%
November-05	\$52,720,645.16	4.030%
December-05	\$57,655,781.25	4.210%
January-06	\$117,075,000.00	4.300%
February-06	\$92,364,689.66	4.510%
March-06	\$34,955,468.75	4.530%
April-06	\$64,977,838.71	4.780%
May-06	\$63,522,687.50	4.960%
June-06	\$80,722,677.42	5.010%
July-06	\$42,036,445.44	5.290%
August-06	\$52,230,410.25	5.360%
September-06	\$42,255,015.29	5.270%
October-06	\$28,569,991.50	5.260%
November-06	\$23,754,924.97	5.270%
December-06	\$55,844,272.75	5.250%
January-07	\$76,576,024.59	5.270%
February-07	\$67,629,674.69	5.260%
March-07	\$66,906,116.50	5.260%
April-07	\$34,358,505.61	5.260%
May-07	\$89,762,741.50	5.260%
June-07	\$126,776,634.65	5.260%
July-07	\$149,287,272.75	5.280%
August-07	\$193,959,429.00	5.240%
September-07	\$169,563,279.81	5.620%
October-07	\$85,925,304.00	5.050%
November-07	\$55,212,020.67	4.720%
December-07	\$73,478,760.25	4.750%
January-08	\$25,431,034.65	4.980%
February-08	\$34,988,292.71	3.080%
March-08	\$43,500,047.75	3.080%
April-08	\$51,952,034.65	2.630%
May-08	\$79,860,329.00	2.840%
June-08	\$73,191,389.48	2.430%
July-08	\$102,288,454.00	2.450%

August-08	\$132,249,735.25	2.440%
September-08	\$114,129,099.16	2.450%
October-08	\$97,178,922.75	4.950%
November-08	\$118,573,099.16	2.950%
December-08	\$83,309,297.75	1.490%
January-09	\$14,894,563.38	0.5400%
February-09	\$13,612,087.33	0.7900%
March-09	\$16,073,469.15	0.7500%
April-09	\$27,064,244.32	0.5500%
May-09	\$53,960,235.25	0.4000%
June-09	\$80,707,212.06	0.3000%
July-09	\$39,338,391.50	0.3500%
August-09	(\$478,108.50)	0.3000%
September-09	(\$207,433.10)	0.2500%
October-09	\$5,872,891.50	0.2200%
November-09	\$8,062,566.90	0.2200%
December-09	\$8,815,654.00	0.2000%

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**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 49**

**Responding Witness: Daniel K. Arbough**

Q-49. Please indicate if the Company has included banking fees and/or commitment fees and/or other credit fees or costs in its test year operating expenses and revenue requirement. If so, then please identify where these amounts were included, describe the amounts included and quantify the amounts included.

---

A-49. Included in the test year operating expenses within the account 921003 - Office Supplies and Expenses are bank fees in the amount of \$340,824 trustee fees in the amount of \$40,354, commitment fees in the amount of \$24,500 and other credit fees of \$839. The total of these fees is \$406,517.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 50**

**Responding Witness: Daniel K. Arbough**

Q-50. Please describe how the Company uses short term debt, i.e., to finance construction prior to refinancing with permanent capital, short term working capital, etc.

---

A-50. KU funds capital projects with short-term debt, typically in the form of money pool loans, until the Company believes the money pool balance will be permanently in the range of \$50 - \$100 million or above. At that time, the Company issues long-term debt to reduce the amount of outstanding short-term debt. The Company also uses short-term debt to fund various working capital needs. The Company believes it is critical to maintain sufficient liquidity availability in its financing arrangements.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 51**

**Responding Witness: Daniel K. Arbough**

Q-51. Please provide a copy of the Company's or E.ON U.S.'s or any other affiliate's most recent shelf registration with the U.S. Securities and Exchange Commission to the extent that the funds from such financing were or may be used to benefit the Company.

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A-51. Neither KU, nor E.ON U.S., nor any other U.S. affiliate has an active shelf registration with the U.S. Securities and Exchange Commission.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 52**

**Responding Witness: Daniel K. Arbough**

Q-52. Refer to page 4 lines 1-13 of Mr. Arbough's Direct Testimony. Please provide the Company's computation as of October 31, 2009 of its capital structure in accordance with the S&P's guidelines. Provide support for each component of the imputed debt equivalents, including the Company's computation of the net present value of these obligations and the discount factor, if any, that was applied to the net present value, e.g., 30% or 50% commonly used by the rating agencies to quantify the debt equivalent, and all other assumptions, data and computations that were reflected in the Company's computation.

A-52. The requested computation as of October 31, 2009 is displayed below:

	<u>(\$ 000's)</u>
Current portion of long-term debt	\$227,977
Long-term debt	1,403,802
Notes payable to affiliated companies	19,666
Imputed debt per S & P:	
Operating leases	26,500
Postretirement benefit obligations	120,900
Other	26,100
	-----
Total imputed debt	173,500
	-----
Total debt – including imputed	1,824,945
Equity	1,933,128
Total capitalization	3,758,073
Equity/ Capital %	51.44%

The Company does not compute the net present value of the imputed debt equivalents. The numbers used above are those quoted by S&P in its April 3, 2009 analysis of the Company.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

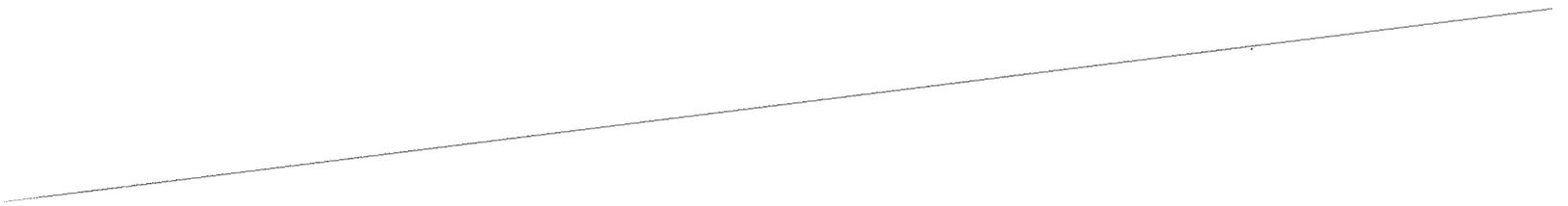
**Question No. 53**

**Responding Witness: Daniel K. Arbough**

Q-53. Please provide a copy of all internal guidelines or policies for the use of short term debt.

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A-53. See the response to Question No. 50.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 54**

**Responding Witness: Daniel K. Arbough**

- Q-54. Refer to page 5 line 18-20 of Mr. Arbough's Direct Testimony. Please provide the savings that the Company has retained from the date of the reacquisition of the tax-exempt bonds and issuance of lower cost short term debt from the date the debt was reacquired through the end of 2009 on a monthly basis. Please provide the computation of these savings, including all assumptions, data and electronic spreadsheets with formulas intact.
- 
- A-54. KU no longer has any reacquired tax-exempt bonds. The last of them was remarketed in December 2008.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

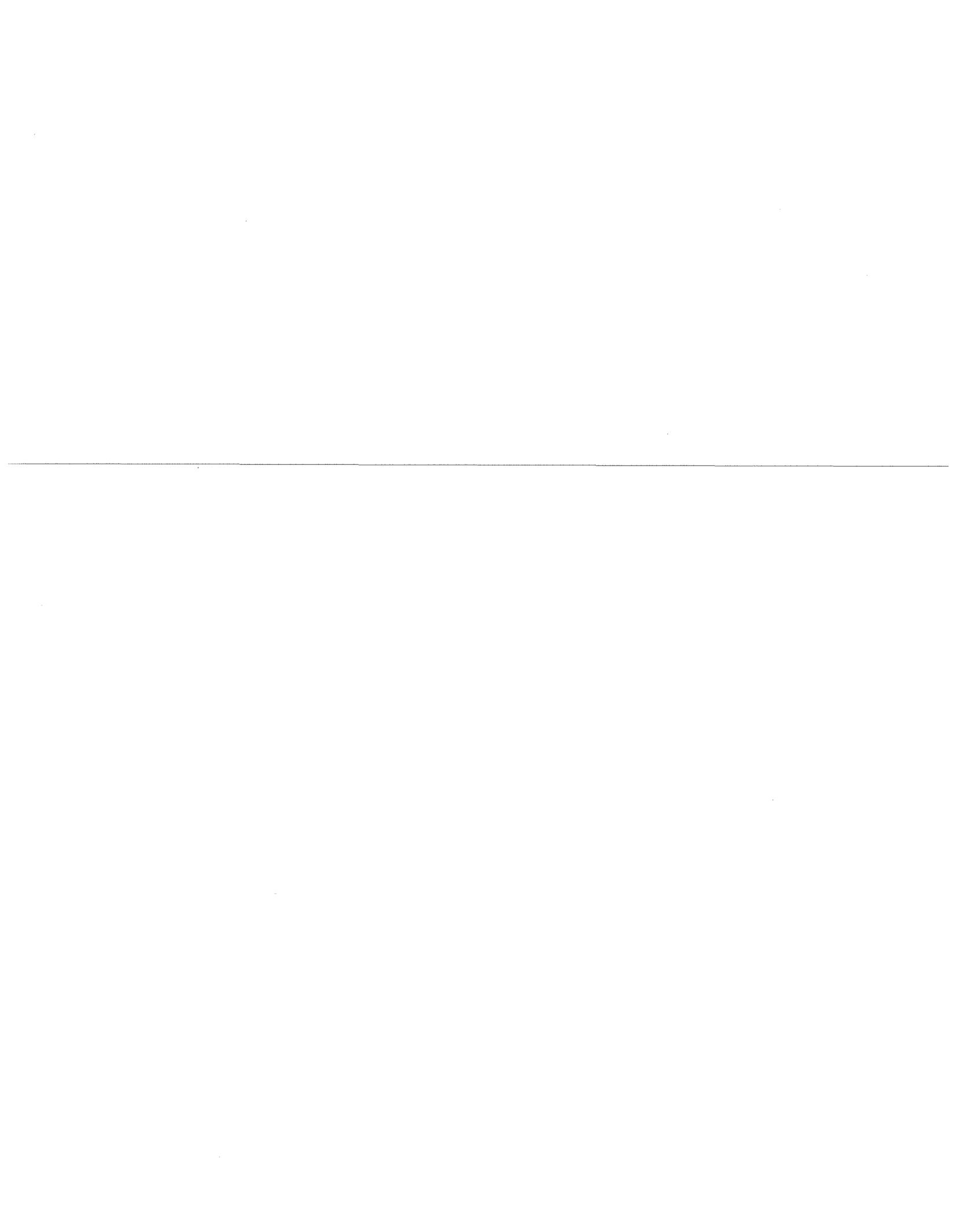
**Question No. 55**

**Responding Witness: Daniel K. Arbough**

Q-55. Refer to page 5 lines 20-21 of Mr. Arbough's Direct Testimony. Please provide the date at which the Company estimates it will reissue the bonds.

---

A-55. Per the response to Question No. 54, the Company no longer has any tax-exempt bonds to be reissued.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 56**

**Responding Witness: Daniel K. Arbough**

Q-56. Refer to page 8 line 4 through page 9 line 19 of Mr. Arbough's Direct Testimony. Please provide the savings that the Company has retained from the date of the termination of the swap on December 16, 2008 through the end of 2009 on a monthly basis. Please provide the computation of these savings, including all assumptions, data and electronic spreadsheets with formulas intact.

A-56. The reference cited in the question relates to LG&E. There was no termination of a KU swap discussed in Mr. Arbough's testimony.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 57**

**Responding Witness: Lonnie E. Bellar**

Q-57. Refer to page 15 lines 3-15 of Mr. Bellar's Direct Testimony.

a. Please identify the start and end dates of the 42 month ITO contract with SPP.

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b. Is the \$233,498 incurred during the test year recurring? Please explain.

A-57. a. Start date: September 1, 2006  
End date: August 31, 2010

The contract covers an initial term of 48 months and the settlement covers 42 months.

b. The \$233,498 referenced in the question is the LG&E amount and the corresponding KU amount is \$415,107. The Companies project that their annual cost to self-provide ITO services will be approximately \$3-4 million, not including start-up costs of approximately \$2 million. The total annual SPP cost is \$3.99 million including the annual impact of the settlement expenses (\$233,498+\$415,107). Therefore, the total annual SPP cost reflects the expected level of annual cost for the Company to self-provide ITO services. Also, see the response to KPSC-2 Question No. 45.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 58**

**Responding Witness: Robert M. Conroy**

Q-58. Refer to Exhibit 1 Schedule 1.07.

- a. Please confirm that the Average of 1.20% computed in column 2, shown in column 3 and used to compute the adjustment in column 4 is based on the simple average of the monthly environmental surcharge factors in column 2.
- b. Please provide a computation of the weighted monthly average of the surcharge factors in column 2.
- c. Is the Company opposed to using the weighted monthly average of the surcharge factors to compute the adjustment in column 4 instead of the simple average used on this schedule? If so, please provide all reasons for the Company's opposition.

A-58. See the response to KPSC-2 Question No. 29.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 59**

**Responding Witness: Robert M. Conroy**

Q-59. Refer to Conroy Exhibit 1. Do these computations reflect the adjustments referred to on page 7 line 1 through page 8 line 4 of Mr. Conroy's Direct Testimony?

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A-59. KU assumes the reference to the Testimony in the question should be page 6 line 13 through page 7 line 7. With this assumption, KU's response is yes.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 60**

**Responding Witness: Shannon L. Charnas**

Q-60. Refer to the Company's response to Staff 1-2 in which the Company identified an affiliate relationship with Ohio Valley Electric Corporation ("OVEC").

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- a. Please provide a detailed description of OVEC.
- b. Please provide a history by year of annual OVEC dividends to the Company both before tax and after tax, by FERC account since the Company first invested in OVEC.
- c. Please provide the OVEC dividends to the Company during the test year both before tax and after tax, by FERC account.
- d. Please provide a history by year of the income statement effect of the OVEC dividends to the Company both before tax and after tax, if any, by FERC account since the Company first invested in OVEC.
- e. Please provide the test year income statement effect of the OVEC dividends to the Company both before tax and after tax, if any, by FERC account.
- f. Please provide a history of annual OVEC earnings included on the Company's income statement both before tax and after tax, if any, by FERC account since the Company first invested in OVEC.
- g. Please provide the test year income statement effect of the OVEC earnings included on the Company's income statement both before and after tax, if any, by FERC account.
- h. Please refer to the Attachment to Response to AG-1 Question No. 34, Page 3 of 20 from KU Case No. 2008-00251 in which KU provided a schedule entitled "Rollforward of Investment in EEI." Please provide a similar "Rollforward" schedule for the Company's OVEC Investment through the end of the test year ended October 31, 2009.

- i. Please provide a history by year of the Company's investment in OVEC since the Company first invested in OVEC.
  - j. Please provide a history of the Company's investment in OVEC from December 31, 2008 through October 31, 2009.
- A-60. a. KU and 10 other electric utilities are participating owners of OVEC, located in Piketon, Ohio. OVEC owns and operates two power plants that burn coal to generate electricity, Kyger Creek Station in Ohio and Clifty Creek Station in Indiana. OVEC's power is currently supplied to KU and 12 other companies affiliated with the various owners. KU owns 2.5% of OVEC's common stock. KU's contractual share of OVEC's output is 2.5%, approximately 55 Mw of generation capacity. In April 2004, OVEC and its shareholders, including KU and LG&E, entered into an Amended and Restated Inter-Company Power Agreement, to be effective beginning March 2006, upon the expiration of the then-current power contract under its terms among the parties. The parties received Kentucky Public Service Commission approval under KRS 278.300 in December 2004 in Case No. 2004-00395 and SEC approval under PUHCA 1935 of the Amended and Restated Inter-Company Power Agreement in February 2005.

KU is a minority shareholder in OVEC, and, therefore, it is not consolidated into the financial statements of the Company and is accounted for under the cost method of accounting.

- b. Dividends were recorded in FERC account 419.

Year	Dividends*	Dividends – Net of Tax
1998	\$ 67,875	\$ 40,479
1999	57,750	34,441
2000	54,375	32,428
2001	92,500	55,165
2002	52,500	31,310
2003	45,000	26,837
2004	45,000	26,837
2005	50,000	30,225
2006	95,000	57,428
2007	112,500	68,738
2008	137,500	84,013
October 31, 2009 – Year to Date	45,000	27,495

\* Data provided is through the end of the test year and the eleven years previous that was readily available.

- c. KU recorded \$130,000 in dividends (net of tax \$79,430) for the 12-months ended October 31, 2009. All dividends are recorded below the line in account 419 and do not impact the calculation of the revenue requirement. The tax on these dividends is recorded in accounts 409 for current taxes and 410 for deferred taxes.
- d. See response to (b.) above.
- e. See response to (c.) above.
- f. KU's investment in OVEC is accounted for using the cost method of accounting, therefore there is no income statement impact of OVEC earnings.
- g. See response to (f.) above.
- h. KU's investment in OVEC is accounted for using the cost method of accounting, therefore there is no change in the investment balance.
- i. The Company has not made any additional investments subsequent to the initial investment of \$250,000.

- j. There have been no changes in the Company's investment in OVEC from December 31, 2008 through October 31, 2009.
-



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 61**

**Responding Witness: Shannon L. Charnas**

Q-61. Refer to the Company's response to Staff 1-2 in which the Company identified an affiliate relationship with Electric Energy, Inc. ("EEI").

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- a. Please provide a detailed description of EEI.
- b. Please provide a history by year of annual EEI dividends to the Company both before tax and after tax, by FERC account since the Company first invested in EEI.
- c. Please provide the EEI dividends to the Company during the test year both before tax and after tax, by FERC account.
- d. Please provide a history by year of the income statement effect of the EEI dividends to the Company both before tax and after tax, if any, by FERC account since the Company first invested in EEI.
- e. Please provide the test year income statement effect of the EEI dividends to the Company both before tax and after tax, if any, by FERC account.
- f. Please provide a history of annual EEI earnings included on the Company's income statement both before tax and after tax, if any, by FERC account since the Company first invested in EEI.
- g. Please provide the test year income statement effect of the EEI earnings included on the Company's income statement both before and after tax, if any, by FERC account.
- h. Please refer to the Attachment to Response to AG-1 Question No. 34, Page 3 of 20 from KU Case No. 2008-00251 in which KU provided a schedule entitled "Rollforward of Investment in EEI." Please provide a similar "Rollforward" schedule for the Company's EEI Investment through the end of the test year ended October 31, 2009.

- i. Please provide a history by year of the Company's investment in EEI since the Company first invested in EEI.
  - j. Please provide a history of the Company's investment in EEI from December 31, 2008 through October 31, 2009.
- A-61. a. KU is a minority shareholder (i.e., owns 20% of the common stock of EEI, which owns and operates a 1,000-Mw generating station in southern Illinois. Previously, KU had a contractual right to take 20% of the available capacity of the station under a pricing formula comparable to the cost of other power generated by KU. This contract governing the purchases from EEI terminated on December 31, 2005 on its own terms. Subsequent to December 31, 2005, EEI has sold power under general market-based pricing and terms. KU has not contracted with EEI for power under the new arrangements, but maintains its 20% ownership in the common stock of EEI.
- 

KU is not the primary beneficiary of EEI, and, therefore, it is not consolidated into the financial statements of KU. EEI is accounted for under the equity method of accounting.

b. Dividends are recorded in account 216.1.

**Dividends from EEI\***

<b>Year</b>	<b>Dividends*</b>
1996	\$ 2,460,420
1997	2,443,622
1998	2,168,058
1999	2,366,775
2000	2,312,037
2001	2,060,553
2002	1,585,021
2003	-
2004	-
2005	-
2006	27,500,000
2007	21,400,000
2008	30,000,000
October 31, 2009 – Year to Date	10,850,000

\* Data provided is through the end of the test year and the thirteen years previous that was readily available. Dividends are accounted for as a reduction to undistributed earnings and are not shown net of tax.

- c. KU recorded \$18,350,000 in dividends for the 12 months ended October 31, 2009. Dividends are accounted for as a reduction to undistributed earnings and are not shown net of tax. All dividends were recorded in account 216.1.
- d. KU's investment in EEI is accounted for using the equity method of accounting, therefore there is no income statement effect from EEI dividends.
- e. See response to (d.) above.

- f. All EEI earnings are recorded in FERC account 418 with the related taxes recorded in FERC accounts 409 for current taxes and 410 or 411 for deffered taxes.

**Earnings from EEI\***

Year	Earnings	Net Earnings
1996	\$ 2,436,136	\$ 1,452,851
1997	2,480,168	1,479,110
1998	2,167,436	1,292,605
1999	2,333,723	1,391,774
2000	2,242,280	1,337,240
2001	1,802,856	1,075,178
2002	6,967,101	4,155,005
2003	3,644,247	2,173,338
2004	2,559,212	1,526,250
2005	2,256,843	1,364,262
2006	29,405,773	17,775,790
2007	26,358,781	16,105,215
2008	29,548,519	18,054,145
October 31, 2009 – Year to Date	254,574	155,545

\* Data provided is through the end of the test year and the thirteen years previous that was readily available.

- g. Earnings from EEI for the 12 months ended October 31, 2009 was \$2,854,702 (\$1,744,223 net of tax recorded in FERC account 410) included in FERC account 418.
- h. See attached.
- i. In 1951, the Company's original investment was \$350,000. In 1953 and 1958 the Company invested \$270,000 and \$675,800, respectively. Since then, the investment has been \$1,295,800.
- j. No investments were made in EEI from December 31, 2008 through October 31, 2009.

**Kentucky Utilities Company  
Rollforward of Investment in EEI**

(a) Year	(b) Capital Stock Ownership (Initial Investment)	(c) Beginning Balance Equity in Earnings	(d) (Form 1 p 225)	(e) Dividends (Form 1 p 225)	(f) Net Activity	(g) Ending Balance Equity in Earnings	(h) Ending Balance Total Investment	(i) Deferred Taxes	(j) Cash Flow
1996	\$ 1,295,800	\$ 848,998	\$ 2,436,136	\$ 2,460,420	\$ (24,284)	\$ 824,714	\$ 2,120,514	\$ -	\$ (24,284)
1997	1,295,800	824,714	2,480,168	2,443,622	36,546	861,260	2,157,060	-	36,546
1998	1,295,800	861,260	2,167,436	2,168,058	(622)	860,638	2,156,438	(73,148)	(622)
1999	1,295,800	860,638	2,333,723	2,366,775	(33,052)	827,586	2,123,386	(57,931)	(33,052)
2000	1,295,800	827,586	2,242,280	2,312,037	(69,757)	757,829	2,053,629	(53,048)	(69,757)
2001	1,295,800	757,829	1,802,856	2,060,553	(257,697)	500,132	1,795,932	(53,048)	(257,697)
2002	1,295,800	500,132	6,967,101	1,585,021	5,382,080	5,882,212	7,178,012	(411,754)	5,382,080
2003	1,295,800	5,882,212	3,644,247	-	3,644,247	9,526,459	10,822,259	(666,851)	3,644,247
2004	1,295,800	9,526,459	2,559,212	-	2,559,212	12,085,671	13,381,471	(845,996)	2,559,212
2005	1,295,800	12,085,671	2,256,843	-	2,256,843	14,342,514	15,638,314	(5,672,466)	2,256,843
2006	1,295,800	14,342,514	29,405,773	27,500,000	1,905,773	16,248,287	17,544,087	(6,320,585)	1,905,773
2007	1,295,800	16,248,287	26,358,781	21,400,000	4,958,781	21,207,068	22,502,868	(8,249,551)	4,958,781
2008	1,295,800	21,207,068	29,548,519	30,000,000	(451,481)	20,755,587	22,051,387	(8,073,923)	(451,481)
10/31/09 - YTD	1,295,800	20,755,587	254,574	10,850,000	(10,595,426)	10,160,161	11,455,961	(3,952,303)	(10,595,426)



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 62**

**Responding Witness: S. Bradford Rives**

Q-62. Refer to Mr. Rives' Exhibit 2.

- a. Please list all amounts by subsidiary and by year included in the undistributed subsidiary earnings in column 4 on these exhibits.
- b. Please list all amounts by subsidiary and by year included in the undistributed subsidiary earnings in column 5 on these exhibits.
- c. Please indicate whether the amounts in column 5 represent only direct investment or also include the earnings from EEI booked below the line.
- d. Please provide the earnings by year from EEI booked below the line.

- A-62.
- a. The entire amount in column 4 is the balance in undistributed earnings associated with KU's investment in EEI reduced by the related deferred tax balance. See response to Question No. 61(h)
  - b. Column 5 includes the cost based equity investment in EEI of \$1,295,800.
  - c. As stated in (b), column 5 includes the cost based equity investment in EEI of \$1,295,800.
  - d. See response to Question No. 61(f).



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 63**

**Responding Witness: Lonnie E. Bellar**

Q-63. Please provide the annualized non-fuel O&M expense projected for TC2. Provide this information by FERC account if available at this level of detail. In addition, please separate the non-fuel O&M expense between amounts recoverable through base rates and through the ECR.

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A-63. The requested information projected for TC2 is attached.

## Projected TC2 Non-Fuel O&amp;M Costs

Amounts in \$000's

Bellar

<u>Operating Expenses:</u>	<u>Account #</u>	<u>2011</u>	<u>2012</u>
OPER SUPER/ENG	500100	674	1,381
OPER SUPER/ENG - INDIRECT	500900	80	83
BOILER SYSTEMS OPR	502002	4,073	4,215
STM EXP(EX SDRS.SPP)	502100	388	419
MISC STM PWR EXP	506100	1,412	1,458
MTCE SUPER/ENG - STEAM	510100	789	817
MTCE-STRUCTURES	511100	759	784
MAINTENANCE-SDRS	512005	233	243
SDRS-COMMON H2O SYS	512015	721	812
MTCE-BOILER PLANT	512100	3,910	4,650
MTCE-ELECTRIC PLANT	513100	307	419
MTCE-MISC/STM PLANT	514100	4,183	4,331
<b><u>ECR Related Maintenance &amp; Variable Generation Costs:</u></b>	<b><u>Account #</u></b>	<b><u>2011</u></b>	<b><u>2012</u></b>
SO2 EMISSION ALLOWANCES	509002	-	-
NOX EMISSION ALLOWANCES	509003	0	0
NOX REDUCTION REAGENT	506104	1,032	1,012
SORBENT INJECTION OPERATION	506109	827	862
ACTIVATED CARBON	506111	4,115	4,302
SCRUBBER REACTANT EX	502006	2,072	2,149
ECR OTHER WASTE DISPOSAL	502011	661	630
ECR FLY ASH DISPOSAL	501252	450	450
MAINTENANCE OF SCR/NOX REDUCTION EQUIP	512101	157	157
MERCURY MONITORS MAINTENANCE	512103	166	171
SORBENT INJECTION MAINTENANCE	512102	194	199
MAINTENANCE SLUDGE STAB SYS	512017	884	915
OTHER WASTE DISPOSAL	502001	10	10
<b>Total TC Unit 2 Non-Fuel Operating Costs 2011 &amp; 2012</b>		<b>28,094</b>	<b>30,470</b>
<b><u>Total TC2 Non-Fuel Operating Expense By Company:</u></b>		<b><u>2011</u></b>	<b><u>2012</u></b>
LG&E		2,498	2,795
KU		10,648	11,914
IMEA/IMPA		4,382	4,903
<b>Total Non-Fuel Operating Costs</b>		<b>17,528</b>	<b>19,612</b>
<b><u>TC2 ECR Recoverable Gen. Variable Costs By Company:</u></b>		<b><u>2011</u></b>	<b><u>2012</u></b>
LG&E		1,506	1,547
KU		6,419	6,596
IMEA/IMPA		2,642	2,714
<b>Total ECR Rec. Gen. Var. Costs</b>		<b>10,567</b>	<b>10,857</b>
<b><u>Total TC2 Non-Fuel Costs By Company:</u></b>		<b><u>2011</u></b>	<b><u>2012</u></b>
LG&E		4,003	4,342
KU		17,067	18,510
IMEA/IMPA		7,024	7,617
<b>Total TC2 Non-Fuel Inc Stmt Costs</b>		<b>28,094</b>	<b>30,470</b>



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 64**

**Responding Witness: Lonnie E. Bellar/Charles R. Schram**

- Q-64. Please provide the net increase in off-system sales margins resulting from the commercial operation of TC2, net of known and measurable reductions in purchased power expense projected on an annualized basis subsequent to the test year. Provide all assumptions, data, computations and electronic spreadsheets with formulas intact.
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- A-64. Please see the attached CD in the folder titled Question No. 64. A petition for confidential treatment of attachment Question No. 64(b) is being filed concurrently herewith.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 65**

**Responding Witness: Lonnie E. Bellar/Counsel**

Q-65. Please provide a copy of the Company's operating budget for the calendar year 2010.

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A-65. Consistent with its historical practice, the Company does not disclose information relating to budgets. 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. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and September 21, 1990 Order in Case No. 90-158 that such information is not discoverable in historical test year rate cases. The budgetary information requested in this data request is not relevant to the analysis of known and measurable pro forma adjustments in this case.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2009-00548**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated March 1, 2010**

**Question No. 66**

**Responding Witness: Lonnie E. Bellar**

- Q-66. Please provide a copy of all studies and/or computations of the Company's revenue requirement reflecting the annualized non-fuel O&M expense for TC2, depreciation expense based on the completed capital cost of TC2 and off-system sales margins resulting from the Company's increased capacity and energy upon commercial operation of TC2. Provide all assumptions, data, computations and electronic spreadsheets with formulas intact.
- 
- A-66. The information in the form requested does not exist. The revenue requirement proposed in this case includes the revenue requirement resulting from the CWIP balance of TC2 at the end of the test year and a pro-forma adjustment for depreciation expense based on the same test year end CWIP balance. The documents on the attached CD in folder titled Question No. 66 in electronic format provide a projection of the incremental base rate (non-fuel, non-ECR) revenue requirement incorporating the items requested above. As this is a planning analysis the amounts do not reflect the application of KU jurisdictional allocators.