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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

MAY 19 2010
PUBLIC SERVICE
COMMISSION

In the Matter of:

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

ATTORNEY GENERAL'S RESPONSES TO DISCOVERY REQUESTS OF
KENTUCKY UTILITIES COMPANY

Comes now the Attorney General of the Commonwealth of Kentucky, by
and through his Office of Rate Intervention, and states as follows for his
responses to the discovery requests of Kentucky Utilities Company.

Respectfully submitted,

JACK CONWAY
ATTORNEY GENERAL



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

Certificate of Service and Filing

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

Lonnie E Bellar
E.ON U.S. LLC
220 West Main Street
Louisville, KY 40202

Honorable Kendrick R Riggs
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KY 40202-2828

Honorable David C Brown, Esq.
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KY 40202

James T Selecky
BAI Consulting
16690 Swingley Ridge Road, Suite 140
Chesterfield, MO 63017

Honorable Frank F Chuppe
Wyatt, Tarrant & Combs, LLP
500 West Jefferson Street
Suite 2800
Louisville, KY 40202-2898

Honorable Gardner F Gillespie
Hogan & Hartson, L.L.P.
555 Thirteenth Street, N.W.
Washington, DC 20004-1109

Kimberly S McCann
William H. Jones Jr.
VanAntwerp, Monge, Jones & Edwards
P. O. Box 1111
Ashland, KY 41105-1111

Iris G Skidmore
415 W. Main Street, Suite 2
Frankfort, KY 40601

Honorable Allyson K Sturgeon
E.ON U.S. LLC
220 West Main Street
Louisville, KY 40202

Honorable Michael L Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202

Honorable Matthew R Malone
Hurt, Crosbie & May PLLC
The Equus Building
127 West Main Street
Lexington, KY 40507

Laurence J Zielke
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KY 40202-3465

Carroll M Redford III
Miller, Griffin & Marks, PSC
271 W Short Street, Suite 600
Lexington, KY 40507

this 10th day of May, 2010



Assistant Attorney General

Attorney General's Responses to Data Requests
of Kentucky Utilities Company
Case No. 2009-00548

WITNESS RESPONSIBLE:

Counsel

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QUESTION 1: To the extent not previously provided, please provide electronic copies (on CD) of all tables, charts, diagrams, schedules, and exhibits (collectively, "Exhibits") contained in the testimony of all witnesses for the AG. Please include all workpapers, schedules, underlying computations and supporting documentation used and relied upon by each witness in the preparation of his or her testimony, including the preparation of all Exhibits. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.

RESPONSE:

Please see the attached CD. Please note that Mr. Watkins conducted his studies utilizing Lotus 1-2-3. These files were converted to Excel and are provided as a courtesy to the EON companies.

Attorney General's Responses to Data Requests
of Kentucky Utilities Company
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WITNESS RESPONSIBLE:

Counsel

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QUESTION 2: To the extent not previously provided, please provide copies of all schedules and underlying computations and workpapers developed in the analysis by the AG and/or its witness(es) of the Companies' requested rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the analyses of the revenue requirement components and computations, including all ratemaking adjustments to the historic data, and the cost of service model.

RESPONSE:

Please see the attached CD.

Attorney General's Responses to Data Requests
of Kentucky Utilities Company
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WITNESS RESPONSIBLE:

Michael Majoros

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QUESTION 3: Is Mr. Majoros aware of any generally accepted accounting principle, public utility commission order, or court opinion approving the netting of storm-related and/or research-group-contribution regulatory assets with cost-of-removal regulatory liabilities, such as Mr. Majoros has proposed in this proceeding? If so, please specifically describe each and every such authority and provide a complete and accurate copy.

RESPONSE:

None.