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PUBLIC SERVICE  
COMMISSION

Jeff DeRouen, Executive Director  
Public Service Commission of Kentucky  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, Kentucky 40602

**Kentucky Utilities Company**  
State Regulation and Rates  
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July 25, 2011

**RE: *The Application of Kentucky Utilities Company for Certificates of Public Convenience and Necessity and Approval of Its 2011 Compliance Plan for Recovery by Environmental Surcharge***  
**Case No. 2011-00161**

Dear Mr. DeRouen:

Enclosed please find an original and fifteen (15) copies of Kentucky Utilities Company's (KU) response to the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC) Initial Requests for Information dated July 12, 2011, in the above-referenced matter.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert M. Conroy'. The signature is fluid and cursive, with the first name 'Robert' being partially obscured by a scribble.

Robert M. Conroy

cc: Parties of Record

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF KENTUCKY UTILITIES )  
COMPANY FOR CERTIFICATES OF PUBLIC )  
CONVENIENCE AND NECESSITY AND )  
APPROVAL OF ITS 2011 COMPLIANCE PLAN ) CASE NO. 2011-00161  
FOR RECOVERY BY ENVIRONMENTAL )  
SURCHARGE )

KENTUCKY UTILITIES COMPANY

RESPONSE TO THE COMMUNITY ACTION COUNCIL FOR LEXINGTON-  
FAYETTE, BOURBON, HARRISON, AND NICHOLAS COUNTIES, INC. (CAC)  
INITIAL REQUESTS FOR INFORMATION

DATED JULY 12, 2011

FILED: JULY 25, 2011

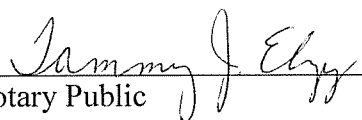
VERIFICATION

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 LG&E and KU Services Company, 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 22<sup>nd</sup> day of July 2011.

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

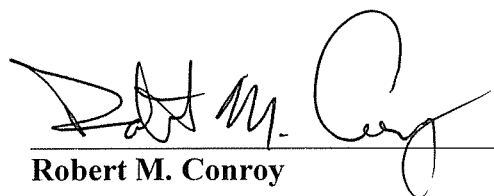
My Commission Expires:

November 9, 2014

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 LG&E and KU Services Company, 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 22<sup>nd</sup> day of July 2011.

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

My Commission Expires:

November 9, 2014



**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Requests for Information Dated July 12, 2011**

**Case No. 2011-00161**

**Question No. 1**

**Witness: Robert M. Conroy**

- Q-1. On Pages 6-7 of the Direct Testimony of Robert M. Conroy, Mr. Conroy estimates the financial impacts of the projects proposed in the application on KU's customers. The residential customer impact is listed for monthly bills for years 2012-2016 based on using 1000 kWh per month. Is the actual average monthly residential usage 1,000 kWh? If not, what is the average monthly usage in kWh of KU's residential customers? Based on the actual average monthly usage, what is the residential customer impact on monthly bills for each of the years 2012-2016 in percentage increases and actual dollars?
- A-1. Please see the response to KPSC Question No. 1.



**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Requests for Information Dated July 12, 2011**

**Case No. 2011-00161**

**Question No. 2**

**Witness: Lonnie E. Bellar**

Q-2. Has KU performed a study to determine how the financial impact of the proposed environmental surcharges for the years 2012-2016 (detailed in the direct testimony of Robert M. Conroy) on residential customers living at or below the federal poverty level will affect the number of shut-offs performed by KU on a monthly or annual basis? If the answer is yes, what is the conclusion of the study? If the answer is no, why has such a study not been performed?

A-2. Please see the response to AG Question No. 11.





**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Requests for Information Dated July 12, 2011**

**Case No. 2011-00161**

**Question No. 3**

**Witness: Lonnie E. Bellar**

Q-3. How will KU lessen the burden of the financial impacts of the proposed environmental surcharges (detailed in the direct testimony of Robert M. Conroy) on its most vulnerable residential customers, those living at or below the federal poverty level?

A-3. Please see the response to AG Question No. 11.