

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

AUG 18 2011

KENTUCKY UTILITIES COMPANY'S )  
APPLICATION FOR AN AMENDED )  
ENVIRONMENTAL COMPLIANCE PLAN, )  
A REVISED SURCHARGE TO RECOVER )  
COSTS, AND CERTIFICATES OF PUBLIC )  
CONVENIENCE AND NECESSITY FOR THE )  
CONSTRUCTION OF NECESSARY )  
ENVIRONMENTAL EQUIPMENT )

PUBLIC SERVICE  
COMMISSION

Case No. 2011-00161

ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Requests for Information to Kentucky Utilities Co. ["KU"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following instructions:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness(es) who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for KU with an electronic version of these data requests, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts

thereof) and if the original is not available, the best copy available. These terms include all information regardless of the medium or media in which they are recorded (including electronic media and e-mail), in any written, graphic or other tangible form including, but not necessarily limited to: all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards / records, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing,

drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company:

(a) please identify: (i) the person by whom it was destroyed and/or transferred; (ii) the transferee; and (iii) the person authorizing the destruction or transfer; and

(b) state: (i) the time, place, and method of destruction or transfer; and, (ii) the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,  
JACK CONWAY  
ATTORNEY GENERAL

*Dennis G. Howard II by Susan S. Durant*  
DENNIS G. HOWARD, II  
LAWRENCE W. COOK  
ASSISTANT ATTORNEYS GENERAL  
1024 CAPITAL CENTER DRIVE, STE. 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 Bellar  
Allyson K Sturgeon  
Robert M Conroy  
Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

Honorable Leslye M Bowman  
Director of Litigation  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KY 40507

Edward George Zuger, III  
Zuger Law Office PLLC  
P.O. Box 728  
Corbin, KY 40702

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

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

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

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

this 18<sup>th</sup> day of August, 2011

Dennis D. Howard II  
Assistant Attorney General *Dy. SSD*

**KENTUCKY UTILITY COMPANY**  
**CASE NO. 2011-00161**  
**ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS**

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1. For the four quarters ending June 30, 2011, please provide the Company's capital structure amounts and ratios, including and excluding short-term debt. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
  
2. For the four quarters ending June 30, 2011, please provide:
  - (1) a calculation detailing the Company's cost of long-term debt;
  - (2) all data, work papers, and source documents, and calculations used in computing the long-term cost rate;
  - (3) all details, including calculations, amortization tables, and work sheets, related to the amounts for unamortized debt issuance balance and unamortized premium/discount and issuance expenses;
  - (4) copies, details, and documentation of all debt issues as well as private placement, and/or loan agreements (issue date, debt amounts, private placement agreements, lending agreements, underwriter, underwriting spread, SEC filings, etc.) associated all financings used in determining the Company's long-term debt cost rate; and
  - (5) copies of all debt cost documents, work papers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
  
3. For the four quarters ending June 30, 2011, please provide:
  - (1) a calculation detailing the Company's cost of short-term debt;
  - (2) all data, work papers, and source documents, and calculations used in computing the short-term cost rate;
  - (3) all details, including calculations, amortization tables, and work sheets, related to the cost of short-term debt; and (4) copies of all debt cost documents, work papers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
  
4. Please provide copies of all presentations made to rating agencies and/or investment firms by PPL and/or the Company between January 1, 2011 and the present. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
  
5. Please provide copies of all prospectuses, bank lending agreements, and/or private placement agreements for any financings by PPL and/or the Company since January 1, 2010. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).

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6. Please provide copies of credit reports for PPL and/or the Company from the major credit rating agencies published since January 1, 2010. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
7. Please provide the corporate credit and bond ratings assigned to PPL and the Company since the year 2006 by S&P, Moody's, and Fitch. For any change in the credit and/or bond rating, please provide a copy of the associated report. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
8. Please provide copies of the financial statements (balance sheet, income statement, statement of cash flows, and the notes to the financial statements) for PPL and the Company for the past two years. Please provide copies of the financial statements in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
9. Please provide copies of all presentations made to the Company's board of directors, senior management, and/or financial officers since January 1, 2010, regarding the Company's proposed financings over the next three-to-five years. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
10. Please provide copies of all internal presentations developed by senior management and/or financial officers since January 1, 2010 regarding the Company's proposed financings over the next three-to-five years. If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).
11. Please provide:
  - (1) the projected quarterly cash flow figures for KU and LGE for 2011, 2012, and 2013;
  - (2) the financing cash inflows and outflows associated with the quarterly projected quarterly cash flow figures for 2011, 2012, and 2013;
  - (3) the projected quarterly capitalization amounts and ratios, including and excluding short-term debt, for 2011, 2012, and 2013; (2) and copies the data, work papers, and source documents used in developing the quarterly capitalizations for 2011, 2012, and 2013;
  - (4) the projected quarterly dividends paid by LG& and KU to PPL, and the projected quarterly equity infusions made by PPL into LGE and KU, for 2011, 2012, and 2013; and
  - (5) the data and work papers associated with parts (1) – (4) in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.



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If this information has been provided in response to another data request, please indicate the appropriate data request number, the document title, and the page number(s).

12. Reference the response to PSC 1-34. Are the noted expenditures for replacement of major plant components and such as turbine shells, generator equipment, steam leads, heaters and transformers normally included in a case filed pursuant to KRS 278.183? If so, please identify the case(s) and number(s).
13. Will the company amend its application, or parts thereof, if the current and anticipated EPA rules addressed therein, are changed whether substantively or procedurally?