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August 24, 2011

RECEIVED

AUG 24 2011

PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

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


RE: 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 and accept for filing the original and fifteen copies each of Kentucky Utilities Company's objections to their responses to the Attorney General's Supplemental Data Requests Nos. 2-4 and 2-11 Dated August 18, 2011; and Kentucky Industrial Utility Customers, Inc.'s Second Set of Data Request No. 2-16 Dated August 18, 2011. Please also find enclosed the interim responses to Supplemental Requests for Information of Rick Clewett, Raymond Barry, Sierra Club, and the Natural Resource Defense Council Nos. 2-28 and 2-29 Dated August 18, 2011 in the above-referenced matter. Please confirm your receipt of these filings by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me via our office courier.

Should you have any questions please contact me at your convenience.

Yours very truly,


Kendrick R. Riggs

KRR:ec
Enclosures
cc: Parties of Record

400001.139563/752756.1

**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
ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS
DATED AUGUST 18, 2011**

FILED: AUGUST 24, 2011

KENTUCKY UTILITIES COMPANY

Response to Attorney General's Supplemental Data Requests Dated August 18, 2011

Case No. 2011-00161

Question No. 4

Witness: Counsel/Daniel K. Arbough

- Q-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).
- A-4. Objections are made to the request for the production of documents on the grounds that it is not a supplemental data request, seeks the production of documents that are irrelevant to the issues in this case, relate to non-utility activities or hypothetical scenarios based upon projections. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. These non-utility activities and projected information are not relevant to the analysis of the issues this case. *KIUC v. Kentucky Utilities Co.*, 983 S.W.2d 493 (Ky. 1998)(in which the Kentucky Supreme Court defined the scope of an environmental surcharge case specifically to *exclude from consideration* the requested information.) Without waiver of these objections, the Company will provide documents responsive to this request under seal and pursuant to a petition for confidential treatment on September 1, 2011 as part of its responses to the supplemental data requests of the AG.

KENTUCKY UTILITIES COMPANY

Response to Attorney General's Supplemental Data Requests Dated August 18, 2011

Case No. 2011-00161

Question No. 11

Witness: Counsel/ Daniel K. Arbough

Q-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 capital 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. 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).

A-11. Objections are made to the request for the information on the grounds that it is not a supplemental data request and seeks the production of projected information that is irrelevant to the issues in this case. *KIUC v. Kentucky Utilities Co.*, 983 S.W.2d 493 (Ky. 1998)(in which the Kentucky Supreme Court defined the scope of an environmental surcharge case specifically to *exclude from consideration* the requested information.) 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. Without waiver of these objections, the Company will provide information responsive to this request on this issues in this case on September 1, 2011 as part of its responses to the supplemental data requests of the AG.

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
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. (KIUC)
SECOND SET OF DATA REQUESTS
DATED AUGUST 18, 2011

FILED: AUGUST 24, 2011

KENTUCKY UTILITIES COMPANY

Response to the KIUC's Second Set of Data Requests Dated August 18, 2011

Case No. 2011-00161

Question No. 2-16

Witness: Counsel/Daniel K. Arbough

- Q2-16. Please provide a complete, detailed copies of Kentucky Utilities Company's most recent bond rating agency presentations (i.e., not a slide-show summary, but the volume that discusses in detail the Company's operations, generation, transmission assets, purchased power contracts (including debt imputation expected from such contracts, financial projections and service territory economics.)
- A2-16. Objections are made to the request for the production of documents on the grounds that it is not a supplemental data request, seeks the production of documents that are projections irrelevant to the issues in this case or relate to non-utility activities. 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 non-utility activities and projected information are not relevant to the analysis of the issues this case. *KIUC v. Kentucky Utilities Co.*, 983 S.W.2d 493 (Ky. 1998)(in which the Kentucky Supreme Court defined the scope of an environmental surcharge case specifically to *exclude from consideration* the requested information.) Without waiver of these objections, the Company will provide documents responsive to this request under seal and pursuant to a petition for confidential treatment on September 1, 2011 as part of its responses to the supplemental data requests of KIUC.

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)	CASE NO.
APPROVAL OF ITS 2011 COMPLIANCE PLAN)	2011-00161
FOR RECOVERY BY ENVIRONMENTAL)	
SURCHARGE)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO THE SUPPLEMENTAL REQUESTS FOR INFORMATION OF
RICK CLEWETT, RAYMOND BARRY, SIERRA CLUB, AND THE
NATURAL RESOURCE DEFENSE COUNCIL
DATED AUGUST 18, 2011

FILED: AUGUST 24, 2011

KENTUCKY UTILITIES COMPANY

**Response to the Supplemental Requests for Information of
Rick Clewett, Raymond Barry, Sierra Club and the Natural Resource Defense Council**

Case No. 2011-00161

Question No. 28

Witness: Daniel K. Arbough

- Q-28. Please provide all reports, memoranda, presentations, or other documents provided to or considered by the KU, LG&E, or PPL Board of Directors (and any subcommittee of that Board) within the past five years concerning
- a. the status of the Companies' coal-fired generating stations (the Coal Plants),
 - b. past, present or future environmental compliance of the Coal Plants, litigation or settlements (including NSR settlements with the EPA and/or DOJ) concerning the Coal Plants, to the extent not covered by attorney-client privilege,
 - c. past, present or future need for the Coal Plants, or the need for or plans for capital additions to the Coal Plants, whether for environmental compliance or otherwise, and
 - d. any other matter that could affect the costs or output of the Coal Plants.
- A-28. Review of information possibly responsive to this request is not complete and is presently on going. Responses to the request for information will be filed on September 1, 2011 subject to possible objections as may be determined during the course of the review of potentially responsive information.

KENTUCKY UTILITIES COMPANY

**Response to the Supplemental Requests for Information of
Rick Clewett, Raymond Barry, Sierra Club and the Natural Resource Defense Council**

Case No. 2011-00161

Question No. 29

Witness: Daniel K. Arbough

- Q-29. To the extent not already provided in response to request 28 above, please provide any agendas, handouts, minutes, documents or notes prepared for or resulting from each meeting of the Companies' Board of Directors (and any subcommittee of that Board) at which the matters of request 28 were discussed in any way.
- A-29. Review of information possibly responsive to this request is not complete and is presently on going. Responses to the request for information will be filed on September 1, 2011 subject to possible objections as may be determined during the course of the review of potentially responsive information.