

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION FOR TRANSFER )  
OF LOUISVILLE GAS AND ELECTRIC )  
COMPANY AND KENTUCKY UTILITIES ) CASE NO. 2001-104  
COMPANY IN ACCORDANCE WITH )  
E.ON AG'S PLANNED ACQUISITION )  
OF POWERGEN PLC )

COMMISSION STAFF'S INFORMATION REQUEST TO E.ON AG

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that E.ON AG ("E.ON") file the original and 11 copies of the following information no later than August 30, 2001, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information should be provided for total company operations and jurisdictional operations, separately.

1. Provide the following information for each individual currently employed in E.ON's New York office:
  - a. Job title.
  - b. Brief description of job duties.
  - c. Job title and office location of direct supervisor.
  - d. Job title and office location of individuals supervised.
2. Provide the same information as requested in Item 1 for each individual that E.ON reasonably expects to employ in its New York office after its acquisition of LG&E Energy Corp. ("LG&E Energy"), Louisville Gas and Electric Company ("LG&E"), and Kentucky Utilities Company ("KU").
3. Explain in detail the specific functions and duties that are currently performed in E.ON's New York office and those that are likely to be added in the future.
4. Explain in detail the specific functions and duties that will be performed in E.ON's New York office on behalf of LG&E Energy, LG&E, and KU after their acquisition by E.ON.
5. For each function or duty described in response to Items 3 and 4, provide a detailed explanation of why the function or duty must be performed in New York and why it could not be performed in Louisville, Kentucky.
6. For each function or duty described in response to Item 4, explain whether LG&E Energy, LG&E, or KU have historically performed similar functions or duties from their respective headquarters in Kentucky.
7. What is the maximum number of employees that E.ON reasonably expects to be employed in its New York office at any one time through 2012?

8. Refer to E.ON's August 14, 2001 letter setting forth its conditional acceptance of commitment #36 which relates to E.ON's United States headquarters.

a. Explain in detail the meaning of the phrase "political circles" as used in the last sentence of the first full paragraph on page 2.

b. Explain in detail how E.ON employees living in the New York metropolitan area will have an advantage over similar employees in Kentucky to "strengthen the role and reputation of the Commonwealth of Kentucky, especially in relation to investor and political circles."

9. Does PowerGen plc ("PowerGen") have a New York office to represent it in the capital market and the investor community at the New York Stock Exchange?

a. If yes, provide the same information requested in Item 1.

b. If no, from what office location has PowerGen historically performed these functions?



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Thomas M. Dorman  
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DATED: 8/22/01

cc: Parties of Record