

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE JOINT INTEGRATED RESOURCE PLAN)	
OF LOUISVILLE GAS AND ELECTRIC COMPANY)	CASE NO.
AND KENTUCKY UTILITIES COMPANY)	2002-00367

SUPPLEMENTAL DATA REQUEST OF COMMISSION STAFF TO
LOUISVILLE GAS & ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company and Kentucky Utilities Company (LG&E and KU), pursuant to 807 KAR 5:001, are requested to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due March 14, 2003. Each copy of the data 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 person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information requested herein has been previously provided, reference may be made to the specific location of said information in responding to this information request.

1. Refer to Item 4(a) of the response to the Commission Staff s December 13, 2002 data request.

a. Provide the job description for a Customer Service Representative (CSR) employed by KU, LG&E, or LG&E Energy Services. Specifically identify the portion of the CSR job description that applies to marketing duties.

b. If the job description does not specifically identify marketing as a job duty, explain in detail why the response refers to CSRs.

c. The response states that the companies have over 180 CSRs. Provide, by company, a breakdown showing how many of the 180 CSRs are full-time employees, part-time employees, or are outsourced.

2. Refer to Item 4(b) of the response to the Commission Staff's December 13, 2002 data request.

a. Provide the organization chart for the DSM department at the end of 2002.

b. Provide the job description for all employees identified in the organization chart of the DSM department, excluding CSRs. Include specific job duties.

c. Provide, by job description, the number of years experience that each DSM department employee has with DSM programs.

3. Refer to Item 4(f) of the response to the Commission Staff's December 13, 2002 data request, which states that the Information Technology group (IT) has not been made aware of the program database.

a. Do KU and LG&E believe that IT should be involved in a project of this importance to determine whether the off-the-shelf software will adequately ensure the security and protection of the data in a client-server application?

b. If the response to part (a) is no, describe in detail the reason(s) for not having IT involved.

c. Describe the current processes and procedures intended to prevent a non-regulated affiliate from gaining access to the regulated utilities' customer data.

d. Have LG&E and KU verified that the off-the-shelf software planned to be used will adequately handle the program's data needs? Explain the response.

e. Describe in detail the processes and procedures currently in place to address security and protection of customer data issues.

4. Refer to Item 13(a) of the response to the Commission Staff's December 13, 2002 data request, which indicates that the number of customers served under this tariff is decreasing significantly.

a. Provide a detailed explanation for why KU continues to include this tariff as a DSM program.

b. Explain why KU does not forecast the customers under this tariff.

c. Has KU performed any analysis to determine the reason(s) for the declining number of customers? If yes, provide the analysis and a narrative summary of its results. If no, explain why such an analysis has not been performed.

d. Does KU have any information indicating that the decrease is due to customers switching from electric water heating to gas water heating?

5. Refer to Item 5 of the response to the Commission Staff's December 13, 2002 data request, which states the Companies are currently reviewing the economic operability of the group of units identified on page 5-44 of Volume I of the 2002 IRP. When is this review expected to be completed?

6. Refer to Item 7 of the response to the Commission Staff's December 13, 2002 data request. The response indicates that interaction between LG&E/KU and the Midwest Independent System Operator (MISO) may be required to accomplish some of the transmission improvements outlined in Volume III, Technical Appendix, under the section labeled Transmission Projects.

a. Explain MISO's role regarding these transmission improvements. Describe in detail MISO's authority in the ultimate decisions to be made regarding any of these improvements.

b. Explain how native load customers will be protected from bearing the costs of certain transmission improvements if those projects provide no benefit to those customers.

7. Refer to Item 8 of the response to the Commission Staff's December 13, 2002 data request which refers to potential reply comments that LG&E and KU might file with the Federal Energy Regulatory Commission on its Standard Market Design proposal. If reply comments are filed, provide a summary of the comments similar, in scope and detail, to the summary of the original comments filed by LG&E and KU

8. Refer to Item 10 of the response to the Commission Staff's December 13, 2002 data request. The response explains that \$350 million is currently being invested in SCR technology for the OVEC generating units and that the units' remaining useful life will extend through the life of the SCRs.

a. How many of the 11 OVEC units will receive the SCR technology?

b. Provide the expected life of the SCRs.

9. Refer to Item 18 of the response to the Commission Staff's December 13, 2002 data request, page 2, which shows long-term debt cost rates of 5.14 percent and 5.81 percent for LG&E and KU, respectively. Describe LG&E's and KU's efforts to refinance their long-term debt in order to take advantage of lower interest rates.

10. Refer to Item 21(b) of the response to the Commission Staff's December 13, 2002 data request. Provide an analysis that shows the potential impact on LG&E's

and KU s rates if the proposed MISO cost adders for Schedules 10, 16, and 17 are passed through to retail customers.

11. Refer to Item 23(a) of the response to the Commission Staff s December 13, 2002 data request, which indicates that increases in the price of natural gas have eliminated the need for paying incentives.

a. Provide KU s market share of construction starts for single-family and multi-family residences for the years 2000, 2001 and 2002.

b. Explain why the annual data requested in Item 23 was not available for the period 1996-1999.

c. Was there any requirement that KU provide similar annual data to the U. S. Department of Energy (DOE)? If yes, provide the relevant information from the DOE reports for the years 1996-1999.



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cc: All parties