

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ADJUSTMENT OF RIDER AMRP OF THE) CASE NO.
UNION LIGHT, HEAT AND POWER COMPANY) 2003-00103

FIRST DATA REQUEST OF COMMISSION STAFF
TO THE UNION LIGHT, HEAT AND POWER COMPANY

The Union Light, Heat and Power Company (ULH&P), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and 6 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 3, 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 herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Refer to the Application, page 2, paragraph 4. Explain in detail why ULH&P is proposing that the proposed changes to the Accelerated Main Replacement Program (AMRP) Rider become effective for bills rendered on and after June 2, 2003.

Include in this explanation the manner in which ULH&P's request is consistent with the Commission's Orders in Case No. 2002-00107.¹

2. Refer to the Application, Tab 2, concerning blanket contracts.
 - a. Explain in detail the nature and reason(s) supporting ULH&P's use of blanket contracts. Include in this explanation a description of how these contracts are awarded and how terms and conditions are established.
 - b. Explain in detail why ULH&P believes the work covered by the blanket contracts is part of the AMRP.
 - c. ULH&P has identified eight blanket contracts in its Application. The explanation of the work covered by the contract is only identified as Blanket Contract for various work for gas department. For each of the eight blanket contracts, provide a detailed description of the work actually performed under the contract.
 - d. Have any of the vendors listed under the blanket contracts received contracts for the AMRP module work, either in Kentucky or Ohio? If yes, identify the vendor.
 - e. Four of the listed blanket contracts have contract start dates prior to 2001. The Commission has previously determined that no work prior to 2001 can be recovered through the AMRP mechanism. Explain in detail why these four blanket contracts should be included in the AMRP.
 - f. Explain in detail why all eight of the blanket contracts have an End Date of January 1, 2004.

¹ Case No. 2002-00107, An Adjustment of Rider AMRP of The Union Light, Heat and Power Company, final Order dated August 30, 2002, rehearing Order dated November 21, 2002.

g. Explain the meaning of the references UNP and NTX as shown in the column titled Contract Price Method.

h. For each of the eight blanket contracts, provide the level of expenditures included in the 2001 AMRP and the 2002 AMRP filings. Provide the work order that corresponds with the appropriate blanket contract.

3. Refer to the Application, Tab 7, AMRP Form 2.0. A comparison of the work orders listed on this form with similar information provided in Case No. 2002-00107 reveals that the same work orders had costs reported for both 2001 and 2002. All of the work orders listed below were classified as 100 percent completed at the end of 2001. The following table shows these work orders and the expenditures reported for 2001 and 2002:

<u>Work Order</u>	<u>Date Project Started</u>	<u>AMRP 2001</u>	<u>AMRP 2002</u>
Mains Plastic			
A4299	July 2001	\$ 12,090	\$ 2,185
A4692	May 2001	52,118	132
A4734	May 2001	28,558	2,604
A4735	May 2001	36,413	45
A4737	May 2001	54,265	1,594
A4738	May 2001	74,180	670
A4929	May 2001	24,563	249
A4931	July 2001	7,623	1,823
A5002	June 2001	5,975	108,304
A5264	April 2001	43,764	117
A5468	June 2001	389,723	134,188
A5469	June 2001	421,276	113,203
A5470	June 2001	213,104	107,789
A6074	June 2001	1,486	210
A6351	September 2001	22,567	857
A6401	November 2001	9,110	1,979
A6649	November 2001	25,797	23,054
A7993	November 2001	7,636	487
Total Mains Plastic		\$1,430,248	\$ 499,490

Mains	Steel			
A5002		June 2001	\$ 164,276	\$ (106,420)
A5468		June 2001	589,470	202,964
A5469		June 2001	1,259,506	338,448
A5470		June 2001	370,996	187,651
Total Mains	Steel		\$2,384,248	\$ 622,643
Services	Plastic			
A5220		June 2001	\$ 449,516	\$ (30,783)
A5272		May 2001	505,323	(42,327)
Total Services	Plastic		\$ 954,839	\$ (73,110)
Customer Service Lines	Plastic			
A5221		June 2001	\$ 232,403	\$ 9,062
A5273		May 2001	136,817	(2,084)
Total Customer Service Lines	Plastic		\$ 369,220	\$ 6,978

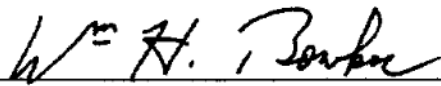
a. For each of the work orders listed above, describe the expenditures reported for 2002. Include any documentation that supports the expenditure.

b. For each of the work orders listed above, explain in detail why expenditures have been claimed in 2002 for work orders that ULH&P reported in Case No. 2002-00107 as having been completed.

4. Refer to the Application, Tab 7, AMRP Form 2.0. All the work orders shown on this form are designated by ULH&P as 100 percent complete. Prepare a schedule by work order number showing any expenditures made to date in 2003 for a work order listed on AMRP Form 2.0. If there have been any expenditures in 2003, explain in detail why 2003 expenditures are being incurred on work orders designated as 100 percent complete at the end of 2002.

5. Concerning the AMRP modules and associated construction documentation:

- a. Describe in detail the relationship within ULH&P's construction program of AMRP modules, work orders, and job orders.
 - b. Explain in detail how it is determined that a job order, work order, or AMRP module is completed.
 - c. Explain in detail the difference, if any, between a job order, work order, or AMRP module being declared completed and being closed.
6. Concerning the 2003 AMRP work:
- a. Did ULH&P utilize competitive bidding or negotiations to secure the 2003 AMRP work? Explain the response and describe the process ULH&P followed.
 - b. Explain what impact, if any, blanket contracts will have on the 2003 AMRP work.



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Public Service Commission
P. O. Box 615
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DATED: May 21, 2003

cc: All Parties