## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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AN EXAMINATION OF THE APPLICATION OF	)	
THE FUEL ADJUSTMENT CLAUSE OF	)	CASE NO.
KENTUCKY UTILITIES COMPANY FROM	)	2003-00213
NOVEMBER 1, 2002 TO APRIL 30, 2003	)	

## COMMISSION STAFF S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO KENTUCKY UTILITIES COMPANY

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that Kentucky Utilities Company ("KU") file the original and 8 copies of the following information with the Commission, within 14 days of the date of this request, with a copy to all parties of record. Each copy of the information requested shall 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 shall 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.

Refer to KUs response to Item 5, of the Commission's June 18, 2003
 Order. Describe the reasons for the unusual frequency of forced outages for E.W.

Brown Unit 2 between November 6, 2002 and April 11, 2003. In the response indicate whether E.W. Brown Unit 2 is scheduled for any major maintenance work in the near future.

- 2. Refer to KUs response to Item 6 of the Commission's June 18, 2003 Order, which lists 9 contracts that expire by December 31, 2003. Explain what provisions KU has made or will be pursuing to replace the coal received under the expiring contracts. In the explanation, discuss possible contract extensions and reopeners, as well as KUs views on its intended mix of contract and spot purchases to replace the discontinued shipments.
- 3. Refer to KUs response to Item 7 of the Commissions June 18, 2003 Order. KU ranks 24<sup>th</sup> lowest out of 27 utilities surveyed. Explain why KUs purchase price ranks among the highest of the companies in the comparison. In the explanation, include comparisons with utilities thought to require a similar quality of coal to that required by KU.
- 4. Refer to KUs response to Item 8 of the Commission's June 18, 2003

  Order. Provide the percentage breakdown for coal delivery for the E.W. Brown generating station by:
  - a. rail
  - b. truck
- 5. Refer to KUs response to Item 13 of the Commission's June 18, 2003 Order. Explain why KU raised the approval limit authority for fuel procurement as shown in the authority limit matrices.

6. Refer to KUs response to Item 17 of the Commission's June 18, 2003

Order. As a result of its March 10, 2003 solicitation, KU received 25 responses from

165 vendors solicited. Provide a narrative description of any conclusions KU has

reached as a result of the solicitations. Include the following:

a. Whether the number of responses was greater than in recent

solicitations.

b. Whether respondents are judged to be more or less reliable in

terms of deliverability when compared to recent solicitations.

c. Whether respondents appear to be more or less agreeable to

longer-term contracts.

Thomas M. Dorman

**Executive Director** 

Public Service Commission

P. O. Box 615

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DATED August 13, 2003

cc: All Parties