COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY UTILITIES, INC. FOR APPROVAL OF LONG-TERM FINANCING THROUGH THE KENTUCKY INFRASTRUCTURE AUTHORITY FOR THE PURPOSE OF BECOMING CURRENT WITH VARIOUS CREDITORS, INCLUDING ITS WHOLESALE NATURAL GAS SUPPLIER, EQUITABLE ENERGY, LLC

CASE NO. 2004-00276

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COMMISSION STAFF'S DATA REQUEST TO EAST KENTUCKY UTILITIES, INC.

East Kentucky Utilities, Inc. ("East Kentucky") is requested, pursuant to 807 KAR 5:001, to file with the Commission the original and 5 copies of the following information, with a copy to all parties of record. The information requested herein is due within 2 days of the date of this request. 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. Careful attention should be given to copied material to ensure that it is legible. Where information requested herein has been provided, in the format requested herein, reference may be made to the specific location of said information in responding to this request.

1. Refer to Appendix B of East Kentucky's September 30, 2004 application for approval of long-term financing ("the application"). The second paragraph on page 2 indicates that East Kentucky is delinquent in paying for fuel for its vehicles in the amount of \$2,636. Provide an explanation for why East Kentucky is unable to remain current on its fuel costs. 2. Refer to Appendix B of the application, specifically, the sentence in the second paragraph on page 2, which indicates that East Kentucky intends to use a portion of the planned loan proceeds to pay the balance of \$20,932 owed on its vehicles. Explain why East Kentucky proposes this use of the loan proceeds rather than continue paying on its vehicles as it is presently doing.

3. Refer to Appendix B of the application, specifically, the reference to Floyd County Fiscal Court - \$20,000 for loan to pay on bonds due March 2004.

a. Provide the terms of this loan and explain how East Kentucky is able to borrow from the local fiscal court.

b. If any portion of the \$20,000 was used for purposes other than making the bond payment, identify what the uses were and the related amounts.

4. Refer to Appendix B of the application. One of the amounts included is \$54,000 to Tax Consulting, Inc. for wages (management fees). It appears that this amount is for past wages, rather than current wages. Show how this amount was derived and explain why customers should pay, prospectively, on a long-term basis, for prior period operating expenses.

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Beth O'Donnell Executive Director Public Service Commission P. O. Box 615 Frankfort, Kentucky 40602

DATED: October 7, 2004

cc: All Parties