## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF THE UNION	)	
LIGHT, HEAT AND POWER COMPANY	)	
RELATING TO SALE OF 7200 INDUSTRIAL	)	CASE NO. 2005-00199
ROAD CONSTRUCTION/MAINTENANCE	)	
CENTER BUILDING	)	

## COMMISSION STAFF'S FIRST DATA REQUEST TO THE UNION LIGHT, HEAT AND POWER COMPANY

The Union Light, Heat and Power Company ("ULH&P") is requested, pursuant to 807 KAR 5:001, 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 no later than June 27, 2004. 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 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 Section 4(e) of the application which refers to the \$16.1 million net book value of the existing construction/maintenance center at 7200 Industrial Road in Florence, Kentucky. For each of the operations listed below, provide a breakdown of

the net book value showing the original cost and accumulated depreciation assigned to each jurisdiction:

- a. ULH&P's jurisdictional gas operations.
- b. ULH&P's jurisdictional electric operations.
- c. ULH&P's non-jurisdictional operations.
- 2. Refer to Section 5(c) of the application which refers to the projected \$4.1 million net book value of the proposed construction/maintenance center at 1262 Cox Avenue in Erlanger, Kentucky. Provide a breakdown of the \$4.1 million as follows:
  - a. ULH&P's jurisdictional gas operations.
  - b. ULH&P's jurisdictional electric operations.
  - c. ULH&P's non-jurisdictional operations.
- 3. Refer to Section 7(d) of the application, specifically to ULH&P's commitment to credit customers with the sale proceeds in excess of the current net book value in the event Tri-State Improvement Company ("Tri-State") sells the 7200 Industrial Road facility for a higher price than the price at which ULH&P sells it to Tri-State.
- a. Provide a detailed description of the methodology ULH&P plans to use to allow customers to receive the credit, or benefit, of the excess sales proceeds.
- b. The application is silent on ULH&P's intent regarding the impact on customers in the event Tri-State sells the 7200 Industrial Road facility for a price less than ULH&P's selling price to Tri-State. What impact, if any, does ULH&P intend for such an outcome to have on its customers? Explain the response.

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

DATED <u>June 10, 2005</u>

cc: All Parties