COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE PLAN OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR THE VALUE DELIVERY SURCREDIT MECHANISM	)))	CASE NO. 2005-00352

COMMISSION STAFF'S SUPPLEMENTAL DATA REQUEST TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E") 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 on November 28, 2005. 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 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 response to Item 2 of the Commission Staff's October 21, 2005 data request ("Staff's initial request") which identifies an error in Reference Schedule 1.13 of Blake Exhibit 1. The response states that correcting the error "would increase adjusted net operating income and increase the return on common equity of the Company by a minor amount." Calculate and provide the changes referenced in this quote from the response.

2. Refer to the response to Item 4 of Staff's initial request and Reference Schedule 1.30 of Blake Exhibit 1. Based on the information contained in the response, provide a revised schedule 1.30 reflecting a 9 and one-half year average of storm damage expenses.

3. Refer to the response to Item 5 of Staff's initial request and Reference Schedule 1.31 of Blake Exhibit 1. Based on the information contained in the response, provide a revised schedule 1.31 reflecting a 9 and one-half year average of injuries and damages expenses.

4. Refer to the response to Item 6 of Staff's initial request and Reference Schedule 1.32 of Blake Exhibit 1.

a. The response to Item 6 refers to the Commission having "traditionally allowed a 10-year or 5-year time period for purposes of normalizing income statement items that fluctuate significantly from year to year." Post-merger, LG&E has off-system sales data available for 8 years. Given that LG&E has 8 years of data available, explain why it did not use the 8 years of available data to calculate the proposed adjustment to off-system sales margins.

b. Using the information contained in the response to Item 6, provide a revised schedule 1.32 based on the off-system sales from 1998 through June 30, 2005

5. Refer to the responses to Items 8, 9, and 10 of Staff's initial request in which LG&E provided amounts for September 2005 to update the information through August 2005, contained in its application, for (1) administrative expenses related to the Midwest Independent System Operator's ("MISO") "Day 2" operations; (2) revenue

neutrality uplift charges associated with MISO's "Day 2" operations; and (3) revenue sufficiency guarantee make-whole payments and the related charges associated with MISO's "Day 2" operations.

a. Provide the amounts for each of the three items listed above for the month of October 2005.

b. Consider this a continuing request. Provide on a monthly basis as they become available, the amounts for each of the three items listed above, for the remainder of this proceeding until directed otherwise.

6. Refer to the responses to Items 1 through 4 of this request and the response to Item 13(b) of Staff's initial request. Provide a second revised Blake Exhibit 4 that incorporates the results provided in all 5 of these responses.

7. Refer to LG&E's response to Item 11 of Staff's initial request. In LG&E's last general rate case it proposed adjustments to the test-year labor and labor-related costs and the pension and post-retirement expenses.

a. Did the labor and labor-related costs included in LG&E's last general rate case reflect the impact and effects of the Workforce Separation Program ("WSP")?

b. Did the pension and post-retirement expenses included in LG&E's last general rate case reflect the impact and effects of the WSP?

c. Would LG&E agree that in determining its proposed revenue requirement in its last general rate case, it reflected the impacts and effects of the WSP? Explain the response.

d. If the response to parts (a) or (b) above is no, explain in detail what levels of workforce and workforce-related costs were incorporated into LG&E's proposed revenue requirements.

Robert A. Amato for

Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
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DATED: November 14, 2005

cc: All Parties