KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 32

Responding Witness: Counsel

Q-32. Provide a detailed listing of costs for the prior five years as well as those expected for the five years following the end of the test year.

A-32. Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. Without waiver of this objection, the Company intends to supplement this response on August 14, 2012 with information responsive to this request.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 40

Responding Witness: Counsel

Q-40. Provide a detailed financial projection of costs for the five (5) year period following the conclusion of the test year.

A-40. Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. Without waiver of this objection, the Company intends to supplement this response on August 14, 2012 with information responsive to this request.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 41

Responding Witness: Counsel

Q-41. Please reference the Hermann testimony at pp. 19-26 regarding customer service and satisfaction. Please list separately each program's implementation or enhancement date, along with the specific current costs as well as the projected costs on a going forward basis.

A-41. Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. Without waiver of this objection, the Company intends to supplement this response on August 14, 2012 with information responsive to this request.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 79

Responding Witness: Counsel

Q-79. List each proposed pro forma entry which was considered in this filing but not made and state the reason(s) why the entry was not made.

A-79. Objection. All decisions regarding which adjustments to include in the application in this proceeding were made in consultation with legal counsel. Any response to this question necessarily requires the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Commission determined in its July 30, 2010 Order in Case No. 2009-00548 that such information is not discoverable. See pages 6-10 and ordering paragraph 5 of the Commission's Final Order in Case No. 2009-00548 dated July 30, 2010.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 81

Responding Witness: Counsel

Q-81. Please provide a comparison by month, or if not available, by quarter, of budgeted versus actual retirements for each month of 2009, 2010, 2011 and 2012 to date. Please explain any significant variations.

A-81. Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. Without waiver of this objection, the Company intends to supplement this response on August 14, 2012 with information responsive to this request.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 90

Responding Witness: Counsel

Q-90. Please provide detailed calculations of federal income taxes (budgeted and actual) for the year ended 2009, 2010 and 2011.

A-90. Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. Without waiver of this objection, the Company intends to supplement this response on August 14, 2012 with information responsive to this request.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 117

Responding Witness: Counsel

Q-117. For the years 2009, 2010, and 2011, please provide a description of all variations between budgeted and actual expense levels which are due to known and certain changes, providing supporting documentation. Indicate all variations from actual levels which result from the application of inflation or escalation factors. In those instances where inflation or escalation factors were utilized, explain the derivation of the factors used in each case. If a single factor was used, a summary description will suffice.

A-117. Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. The budgetary information requested in this data request is not relevant to the analysis of known and measurable pro forma adjustments in this case.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 148

Responding Witness: Counsel

Q-148. With regard to research and development (R&D) expenditures, please provide:

(b) A comparison of actual vs. budgeted expenditures for 2009, 2010 and 2011.

A-148. (b) Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. Without waiver of this objection, the Company intends to supplement this response on August 14, 2012 with information responsive to this subpart of the request and other subparts.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 150

Responding Witness: Counsel

Q-150. With regard to all capital and expense accounts included in the filing, please provide:

(b) A comparison of actual vs. budgeted expenditures for 2009, 2010 and 2011.

A-150. (b) Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. Without waiver of this objection, the Company intends to supplement this response on August 14, 2012 with information responsive to this subpart of the request and other subparts.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 164

Responding Witness: Counsel

Q-164. Provide a complete explanation of any and all expense reduction goals (cost savings programs) the Company had concerning the development of the 2009, 2010 and 2011 budgets.

A-164. Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. The budgetary information requested in this data request is not relevant to the analysis of known and measurable pro forma adjustments in this case.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Attorney General's Initial Data Requests
Dated July 31, 2012

Question No. 216

Responding Witness: Counsel

Q-216. Please provide copies of all presentations made to rating agencies and/or investment firms by PPL and/or Kentucky Utilities between January 1, 2010 and the present.

A-216. Objections are made to the request for production of documents on the grounds that it seeks the production of documents that are irrelevant to the issues in this case and relate to non-utility activities or hypothetical scenarios based upon projections. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. These non-utility activities and projected information are not relevant to the analysis of known and measurable pro forma adjustments to the historic test period in this case. The Commission determined in its September 6, 1990 Ruling and in its September 21 and October 18, 1990 Orders in Case No. 90-158 that comparable projected information is not discoverable in historical test year rate cases. Without waiver of this objection, the Company intends to supplement this response on August 14, 2012 with information responsive to this request.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated July 31, 2012

Question No. 40

Responding Witness: Counsel

Q-40. Please provide a copy of the Company's operating budget by month for the calendar year 2012. Provide the income statement, balance sheet and cash flow statement.

A-40. Consistent with its historical practice, the Company does not disclose information relating to budgets. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. The Company has used an historic test year in this proceeding; not a forecasted test year. The Commission determined in its September 6, 1990 Ruling and September 21 and October 18, 1990 Orders in Case No. 90-158 that such information is not discoverable in historical test year rate cases. The budgetary information requested in this data request is not relevant to the analysis of known and measurable pro forma adjustments in this case.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to First Set of Data Requests of
Kentucky Industrial Utility Customers, Inc.
Dated July 31, 2012

Question No. 47

Responding Witness: Counsel

Q-47. Referring to the proposed Curtailable Service Rivers CSR10 and CSR30:

(d) Identify and provide all alternative rate credits for the CSR riders that KU considered but rejected, and describe in detail the reasons for rejecting the considered alternative(s).

A-47. (d) Objection. All decisions regarding which rates, rate design and rate creduts to include in the application in this proceeding were made in consultation with legal counsel. Any response to this question necessarily requires the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Commission determined in its July 30, 2010 Order in Case No. 2009-00548 that such information is not discoverable. See pages 6-10 and ordering paragraph 5 of the Commission's Final Order in Case No. 2009-00548 dated July 30, 2010.

CERTIFICATE OF COMPLIANCE

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that Kentucky Utilities Company's August 8, 2012 electronic filing of these Objections to data requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on August 8, 2012; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and two copies in paper medium of the Objections are being mailed by first class U.S. mail, postage prepaid, to the Commission on August 8, 2012.

Counsel for Kentucky Utilities Company