KENTUCKY UTILITIES COMPANY

CASE NO. 2014-00371

Response to Sierra Club's Initial Data Requests
Dated January 8, 2015

Question No. 5

Responding Witness: Counsel

Q-5.   Reference Martin Blake, p. 19, ll. 10-19.

    a) Please provide the rationale for not increasing the basic service charge to $21.47 per month, as indicated by the cost of service study.

    b) Please provide copies of all e-mail communications, internal memoranda, reports, or other documentation of Dr. Blake's and the Company's consideration of the amount to increase the basic service charge and of the decision to increase the basic service charge to $18.00 per month.

    c) Please provide copies of all presentations to Company management or the Company's Board of Directors regarding consideration of the amount by which to increase the basic service charge and of the decision to increase the basic service charge to $18.00 per month.

A-5.   b) Objection. The response to this question may require 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. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.