

ATTORNEYS

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PUBLIC SERVICE COMMISSION

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December 3, 2008

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VIA HAND-DELIVERY

Stephanie Stumbo, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

RE:

Application of Kentucky Utilities Company for an Adjustment of Base Rates;

Case No. 2008-00251

Dear Ms. Stumbo:

Enclosed for filing please find an original and ten (10) copies of the Responses of The Kroger Company to the Kentucky Utilities Company's Data Requests of November 14, 2008.

Very truly yours,

David C. Brown David C. Brown (dab)

DCB/dab

Enclosure

KR091:00KR1:706976:2:LOUISVILLE

Louisville, KY Nashville, TN Frankfort, KY Franklin, TN Jeffersonville, IN Lexington, KY Alexandría, VA Atlanta, GA

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Responses of Kentucky Utility Company's Data Requests of November 14, 2008 on behalf of The Kroger Company was served via U.S. mail, first-class, postage prepaid, this 3rd day of December, 2008 upon the following persons:

Lonnie E. Bellar Vice President – State Regulation Kentucky Utilities Company 220 West Main Street P.O. Box 32010 Louisville, Kentucky 40202

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David C. Brown cdable Counsel for The Kroger Company

Example Rate Spread at a Hypothetical 2 Percent Revenue Reduction Using Kroger's Recommended Revenue Apportionment Approach

Line No.		Current Revenue ^t	KU Proposed Revenue Change ¹	Percent Change at KU Proposed Revenue Change	KU Proposed Revenue	Class % of Proposed Revenue [‡]	Recommended Revenue at an Assumed -2% Overall Rate Change	Revenue Change at an Assumed - 2% Overall Rate Change	Percent Change at an Assumed -2% Overall Revenue Change
1	Total Residential	405,482,758	17,329,356	4.27%	422,812,114	38.32%	407,004,301	1,521,543	0.38%
2	General Service Rate GS - Secondary	135,552,885		0,00%	135,552,885	12.29%	130,484,925	(5,067,960)	-3.74%
	General Service GS- Primary	2,926,095	446,784	15.27%	3,372,879	0.31%	3,246,776	320,681	10.96%
4	Total General Service	138,478,980	446,784	0.32%	138,925,764	12.59%	133,731,702	(4,747,278)	-3.43%
_	and the property of the same	7,592,045	321,938	4.24%	7,913,983	0,72%	7,618,100	26,055	0.34%
5	All Electric School Service Rate- AES	7,372,040	2213,500	***************************************				(7.707.603)	7.719/
6	Large Power Rate LPS - Secondary	208,284,552		0.00%	208,284,552	18.88%	200,497,350	(7,787,202)	-3.74%
7	Large Power Rate LPP - Primary	82,187,686		0.00%	82,187,686	7.45%	79,114,908	(3,072,778)	-3.74% -8.97%
8	Large Power Rate LPT - Transmission	1,298,531	(70,621)	-5.44%	1,227,910	0.11%	1,182,002	(116,529)	-5.97%
9	Small Time-of-Day - STODS Secondary	8,895,156	82,070	0.92%	8,977,226	0.81%	8,641,592	(253,564)	
01	Small Time-of-Day - STODP Primary	716,236	6,637	0,93%	722,873	0.07%	695,847	(20,389)	-2.85%
11	Small Time-of-Day - STODT Transmission					0,00%	0		-3.73%
12	Total Combined Lighting and Power Service	301,382,162	18,086	0.01%	301,400,248	27,32%	290,131,699	(11,250,463)	-3,/378
13	Large Comm./Industrail Time-of-Day - LCI-TOD Primary	128,046,688		0.00%	128,046,688	11.61%	123,259,365	(4,787,323)	-3.74%
14	Large Comm./Industrail Time-of-Day - LCI-TOD Transmission	38,966,242	(38,022)	%01 ₋₀ -	38,928,220	3.53%	37,472,798	(1,493,444)	-3.83%
15	Curtailable Service Riders - Primary - LCI-TOD Primary	(96,313)		0.00%	(96,313)	-0.01%	(92,712)	3,601	-3.74%
16	Curtailable Service Riders - Transmission - LCI-TOD Transmission	(5,446,292)		0.00%	(5,446,292)	-0.49%	(5,242,670)	203,622	-3,74%
17	Total Comm/Industrial Time-of-Day Service	161,470,325	(38,022)	-0.02%	161,432,303	14.63%	155,396,781	(6,073,544)	-3.76%
18	Large Industrial Time of Day	21,958,768		0.00%	21,958,768	1.99%	21,137,788	(820,980)	-3.74%
19	Coal Mining Power Service Rate - MP Primary	6,847,866	575,463	8,40%	7,423,329	0.67%	7,145,791	297,925	4.35%
20	Coal Mining Power Service Rate - MP Transmission	3,839,906	100,123	2.61%	3,940,029	0.36%	3,792,722	(47,184)	-1.23%
21	Total Coal Mine Power Time-of-Day Service	10,687,772	675,586	6,32%	11,363,358	1.03%	10,938,512	250,740	2.35%
	Large Mine Powe Time-of-Day Rate - LMP - TOD Primary	4,717,063	29,196	0.62%	4,746,259	0.43%	4,568,809	(148,254)	-3.14%
22 23	Large Mine Powe Time-of-Day Rate - LMP - TOD Transmission	13,287,705	5,099	0.04%	13,292,804	1.20%	12,795,822	(491,883)	-3,70%
24	Total Large Mine Power Time-of-Day Service	18,004,768	34,295	0.19%	18,039,063	1.64%	17,364,631	(640,137)	-3.56%
	total car go militar and a mil			4,29%	7,557,857	0.69%	7,275,289	22,077	0.30%
25	Street Lighting - SL	7,253,212	304,645	4.20%	1,346,066	0.12%	1,295,740	11,394	0.89%
26	Decorative Street Lighting - SLDEC	1,284,346	61,720	4.75%	4,303,686	0.39%	4,142,783	34,117	0.83%
27	Private Outdoor Lighting - POL	4,108,666	195,020			0.56%	5,953,522	(6,808)	-0.11%
28	Customer Outdoor Lighting - OL	5,960,330	224,423	3.77% 4.22%	6,184,753 19,392,363	1.76%	18,667,334	60,780	0.33%
29	Total Private Outdoor Lighting Service	18,606,554	785,809	4.2278	17,272,203	1.7074	1007,007		
30	Total Ultimate Consumers	1,083,664,132	19,573,832	1.81%	1,103,237,964	100.00%	1,061,990,849	(21,673,283)	-2.00%
31	Miscellaneous Service Revenue	8,694,818	2,536,008	29.17%	11,230,826		11,230,826	2,536,008	29.17%
32	Total Jurisdiction	t,092,358,950	22,109,840	2,82%	1,114,468,790		1,073,221,675	(19,137,275)	+1.75%

^{1.} Data Source: Direct Testimony and Exhibits of William Steven Seeige Exhibit 4, Page 2.

Kroger Recommended Spread at Lower Revenue Requirement

^{2.} The class percentage of KU proposed revenue excludes miscellaneous revenue.