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PUBLIC SERVICE
COMMISSION

Ms. Stephanie Stumbo, Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602

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State Regulation and Rates
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November 19, 2008

**RE: APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN
ORDER APPROVING THE ESTABLISHMENT OF A
REGULATORY ASSET – CASE NO. 2008-00457**

Dear Ms. Stumbo:

Enclosed please find an original and seven (7) copies of the Response of Kentucky Utilities Company to the Initial Requests for Information of the Attorney General dated November 12, 2008, in the above-referenced proceeding.

Due to Greg Thomas unavailability to sign his verification page, the Company will file his verification page the week of November 24, 2008.

Please confirm your receipt of this information by placing the File Stamp of your Office on the enclosed additional copy. Should you have any questions regarding this transaction or this information, please contact me at (502) 627-3780.

Sincerely,

Rick E. Lovekamp

cc: Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY)
FOR AN ORDER APPROVING THE ESTABLISHMENT) CASE NO.
OF A REGULATORY ASSET) 2008-00457

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
ATTORNEY GENERAL'S INITIAL REQUESTS FOR INFORMATION
DATED NOVEMBER 12, 2008

FILED: NOVEMBER 19, 2008

VERIFICATION

STATE OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Valerie L. Scott**, being duly sworn, deposes and says that she is the Controller, for Kentucky Utilities Company, that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

Valerie L. Scott
VALERIE L. SCOTT

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 19th day of November, 2008.

Victoria B. Harper (SEAL)
Notary Public

My Commission Expires:

Sept 20, 2010

VERIFICATION

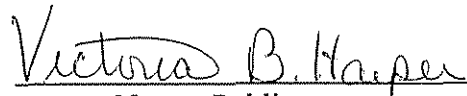
STATE OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Chris Hermann**, being duly sworn, deposes and says that he is Senior Vice President – Energy Delivery for Kentucky Utilities Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



CHRIS HERMANN

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 19th day of November, 2008.

 (SEAL)

Notary Public

My Commission Expires:

Sept 20, 2010

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
Initial Requests for Information
Dated November 12, 2008**

Case No. 2008-00457

Question No. 1

Witness: Valerie L. Scott

- Q-1. Please confirm the following information regarding KU's request to record Hurricane Ike related incremental storm damage expenses of approximately \$2.6 million in a Regulatory Asset account:
- a. Confirm that the total jurisdictional KU O&M expenses for the 12-month period ended 4/30/08 amount to \$788,744,614.
 - b. Confirm that the incremental Hurricane Ike related storm damage expenses of \$2,555,402 represent approximately .32% of the total jurisdictional KU O&M expenses for the 12-month period ended 4/30/08.
 - c. Explain why the incremental Hurricane Ike related storm damage expenses of \$2,555,402 should be considered "extraordinary" (10/27/08 Petition, page 6, paragraph 10) and warrant the establishment of a Regulatory Asset account considering that the approximate cost of \$2.6 million only represents 32% of KU's total jurisdictional O&M expenses.
 - d. Provide the total jurisdictional KU O&M expenses for the 12-month period ended 9/30/08.
- A-1.
- a. KU jurisdictional O&M expenses for the 12-month period ended 4/30/2008 amount to \$709,093,676 for operating expenses and \$79,650,938 for maintenance expenses totaling \$788,744,614 as shown in KU's Application Volume 1, Financial Exhibit, Page 5 of 8.
 - b. KU incremental Hurricane Ike related storm damage expenses of \$2,555,402 are representative of .32% of the total jurisdictional KU O&M expenses for the 12-month period ended 4/30/08.

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- c. The storm damage expenses for this one event of \$2,555,402 should be considered extraordinary because this storm alone approximates the normalized amount proposed in Case No. 2008-00251 for all storms in the test year. Moreover, KU's total storm damage costs for year to date October 2008, already over \$5.8 million in operations and maintenance costs, excluding the Hurricane Ike storm, far exceed the amount embedded in base rates. Since the 2003 ice storm, no single storm in KU's service territory cost more than \$2.5 million.

 - d. KU jurisdictional O&M expenses for the 12-month period ended 9/30/08 amount to \$743,973,973 for operating expenses and \$86,023,784 for maintenance expenses totaling \$829,997,757.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
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Case No. 2008-00457

Question No. 2

Witness: Valerie L. Scott

- Q-2. Please refer to Rives Exhibit 1, Reference Schedule 1.18 in KU's pending rate case, Case No. 2008-00251:
- a. Confirm that in 2004, KU incurred storm damage expenses of \$4,120,000 and did not consider these storm damage expenses to be extraordinary enough to warrant Regulatory Asset account treatment similar to what it is proposing for the \$2,555,402 Hurricane Ike related storm damage expenses. Rather, KU included the \$4.12 million expense as part of its 10- year storm damage normalization adjustment.
 - b. Confirm that in 2005 through 4/30/08, KU incurred annual storm damage expenses of \$2,538,000, \$4,114,000, \$2,035,000 and \$5,708,100 and did not consider these storm damage expenses to be extraordinary enough to warrant Regulatory Asset account treatment similar to what it is proposing for the \$2,555,402 Hurricane Ike related storm damage expenses. Rather, KU included these storm damage expenses as part of its 10-year storm damage normalization adjustment.
- A-2.
- a. During 2004, KU did incur storm distribution O&M costs of \$4,120,000 for all storms during the year. No single storm in 2004 exceeded the cost of the Hurricane Ike Storm of \$2,555,402. As noted in response to Question No. 1(c), KU's total storm damage expenses for year to date October 2008, excluding the Hurricane Ike storm, exceed \$5.8 million.
 - b. KU did incur the annual storm damage expenses in 2005 through 4/30/08 listed in the question above for all storms during those years. No single storm from 2005 through 4/30/08 exceeded the cost of the Hurricane Ike storm of \$2,555,402.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
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Case No. 2008-00457

Question No. 3

Witness: Chris Hermann / Greg Thomas

- Q-3. With regard to Exhibit 1 attached to the 10/27/08 Petition, please provide the following information:
- a. For each cost line item shown in the KU column (adding to the estimated cost of \$3,571,721), provide (1) the actual cost incurred to date, including actual source documentation supporting these actual costs; (2) the estimated remaining costs, including the basis for these estimated costs and any source documentation in support of the estimates.
 - b. For the \$678,460 contingency cost, explain what this contingency cost exactly represents; what the basis is for the \$678,460 amount; and a breakout of the actual and estimated portions of the \$678,460.
 - c. Explain why the \$1,382,267 cost for internal KU and SERVCO employees is not duplicative of the internal KU and SERVCO employee base and overtime labor costs embedded in KU's current rates and to be included in the rates to be established in KU's pending rate case.
 - d. Please provide a detailed explanation for each of the Internal Employee Resource Cost adjustments for KU of \$(335,459), \$(198,430), \$(409,009), and \$(14,156) shown on page 14 of the 10/27/08 Petition. In addition, explain how the Company determined and calculated these cost amounts.
- A-3. a. See the enclosed CD which includes the actual cost incurred to date (through October 31, 2008) and estimated remaining costs. The Company will only seek recovery for actual costs incurred and not for any estimates or contingencies. On the attached schedules, the basis for the estimated costs is as follows:
- 1) Contractor estimates are for the companies that have not yet sent KU invoices and are based on estimated number of resources and hours worked.

2) The oil spill clean up estimates are based on the total number of oil spills and an estimated cost per oil spill for the work necessary to clean up the oil spill.

3) As described, in response to part b below, the contingency has been adjusted to account for the differences between actual invoices received and original estimated costs.

- b. A financial model was utilized to estimate storm costs. The estimate includes a 10% contingency, which as proven reasonable, to allow for differences between actual and estimated costs. As invoices are received the contingency is used to offset differences between actual and estimated costs. Thus, the contingency amount will vary over time until a substantial amount of invoices has been received and the overall estimate can be refined. In any event, the Company will only seek recovery for actual cost incurred and not for any estimates or contingencies. The \$678,460 contingency in Exhibit 1 has been updated in the schedule referenced in response to part a above, to \$439,902 based on changes from actual invoices received to date.
- c. The \$1,382,267 represents the internal labor costs charged to the storm project from KU and SERVCO employees. The amounts at the bottom of Exhibit 1 in the "Estimated Amount Considered Normal Operations" of (\$335,459), (\$198,430), (\$409,009) and (\$14,156) represent the labor costs for KU and SERVCO employees that are included in base rates. These figures represent the labor for employees that is normally charged to O&M expense. Since it is shown as an offset, the bottom line net figure on Exhibit 1 is not duplicative of internal employees' base labor costs embedded in KU's current rates.
- d. The Internal Employee Resource Cost adjustments for KU represent the portion of the O&M cost charged to the storm that would have been incurred in normal operations during the storm period. These amounts were derived by calculating employee costs associated with what would have been normal O&M work during the storm period. The (\$335,459) and (\$198,430) are amounts that KU and SERVCO employees charged to the LG&E storm but are normally charged to O&M expense for KU. The (\$409,009) and (\$14,156) are amounts that KU and SERVCO employees charged to the KU storm but are normally charged to O&M expense for KU. These are the estimated amounts that are embedded in KU's base rates.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
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Case No. 2008-00457

Question No. 4

Witness: Valerie L. Scott

- Q-4. Page 14 of the 10/27/08 Petition shows that KU incurred costs of \$1,536,963 for the labor expenses from KU employees. In this regard, please provide the following information:
- a. Has KU been reimbursed by LG&E for the \$1,536,936 of costs incurred on behalf of LG&E? If not, why not?
 - b. How will KU account for the cost reimbursement of \$1,536,936?
 - c. Explain why the \$1,536,936 cost for internal KU employee labor (to be reimbursed by LG&E to KU) is not duplicative of the internal KU employees base and overtime labor costs embedded in KU's current rates and to be included in the rates to be established in KU's pending rate case.
- A-4.
- a. KU has been reimbursed for all labor costs charged to LG&E by KU.
 - b. KU charged its storm labor costs directly to LG&E's O&M expenses and recorded an intercompany receivable on KU to represent the amount for reimbursement from LG&E.
 - c. The \$1,536,936 for the cost of KU internal labor charged to LG&E represents KU's internal labor costs charged directly to LG&E's storm project. The amounts at the bottom of Exhibit 1 in the "Estimated Amount Considered Normal Operations" of (\$335,459), represent labor costs for KU employees charged to LG&E that are included in KU's base rates. This figure represents the labor for KU employees that is normally charged to KU's O&M expense. Since it is shown as an offset, the bottom line net figure on Exhibit 1 is not duplicative of internal employees' base labor costs embedded in KU's current rates.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
Initial Requests for Information
Dated November 12, 2008**

Case No. 2008-00457

Question No. 5

Witness: Chris Hermann / Greg Thomas

Q-5. With regard to the Internal Employee Labor Costs – KU Employees of \$1,143,001, please provide the following information:

- a. Was the \$1,343,001 internal labor cost incurred by existing KU employees who were on KU's payroll prior to and during the storm or is this cost associated with new employees hired by KU as a result of the storm.
- b. Did KU hire additional employees specifically to address the storm? If so, provide all relevant details regarding these newly hired employees.

A-5. a. The \$1,343,001 internal labor cost was incurred by existing KU employees.

b. No.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
Initial Requests for Information
Dated November 12, 2008**

Case No. 2008-00457

Question No. 6

Witness: Chris Hermann / Greg Thomas

Q-6. Reference KU's letter to the PSC dated Dec. 19, 2007, in Administrative Case No. 2006-00494., Attached to that letter is a document entitled, "Vegetation Management Plan" ["VMP"]. As a result of the Hurricane Ike-related storm damage, has the company made any determinations as to whether it followed the VMP in all respects? Provide a complete explanation.

A-6. Yes, the VMP has been followed in all respects.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
Initial Requests for Information
Dated November 12, 2008**

Case No. 2008-00457

Question No. 7

Witness: Chris Hermann / Greg Thomas

Q-7. Does the company envision any changes to the VMP as a result of the Hurricane Ike-related storm damage? Explain.

A-7. No changes are envisioned to the VMP as a result of the Hurricane Ike storm damage. The Company employs a VMP that controls undesirable vegetation and includes natural or directional pruning and tree removals. The program includes flexibility to operate and maintain variable easement widths, differences between rural and urban service areas, and the need to maintain some level of flexibility in addressing landowner requests and concerns.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
Initial Requests for Information
Dated November 12, 2008**

Case No. 2008-00457

Question No. 8

Witness: Chris Hermann / Greg Thomas

- Q-8. Media reports issued during the period of restoration work indicated that the storm caused approximately 500 poles to break, fall down or otherwise cause outages. Provide a data run indicating the serial numbers of the affected poles and the vintage of each such pole. If the data is not available for each pole, provide the best data available for the average vintage of each affected pole.
- a. Provide any company policies with regard to pole inspection and replacement.
 - b. For each such affected pole, provide any and all data regarding the last inspection dates.
 - c. As a result of the Hurricane Ike storm-related damage, does the company foresee any changes to its policies regarding replacement and/or inspection of both transmission and distribution poles of any type or sort?
- A-8. Due to emergency conditions and urgency of repair, the serial number and vintage of each affected pole is not available. The average age of poles on KU property is 30 years.
- a. Electric facilities, which include poles, are inspected as required by the Kentucky Public Service Commission per regulation 807 KAR 5:006 Section 25 – Inspection of Systems. Distribution poles are inspected externally for visible damage. Poles with ground line deficiencies are sounded and drilled to determine the extent of decay. In areas where poles appear to be solid, a representative sample of approximately 10% are sounded. Poles found to be deficient are replaced.
 - b. The locations and identity of the failed distribution poles from Hurricane Ike are not available. Each circuit and poles are inspected every two years as required by the Kentucky Public Service Commission per regulation 807 KAR 5:006 Section 25 – Inspection of Systems. All circuits impacted by Hurricane Ike have been inspected within two years.
 - c. No. The Company does not foresee any changes to its policies as a result of Hurricane Ike.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
Initial Requests for Information
Dated November 12, 2008**

Case No. 2008-00457

Question No. 9

Witness: Chris Hermann / Greg Thomas

Q-9. By what method does KU determine when right-of-way ["ROW"] maintenance is necessary – cycle timing, specific circuit-to-station reliability results, or by inspection of ROW? As a result of the Hurricane Ike storm-related damage, does the company foresee any changes to these inspection policies? If not, why not?

A-9. KU determines when right-of-way maintenance is necessary based on vegetation growth, cycle timing, reliability data, and visual inspections made by Arborists who are certified by the International Society of Arboriculture. No changes are envisioned as a result of Hurricane Ike storm damage to the method to determine when right-of-way maintenance is necessary. KU employs a VMP that controls undesirable vegetation and includes natural or directional pruning and tree removals. The program includes flexibility to operate and maintain variable easement widths, differences between rural and urban service areas, and the need to maintain some level of flexibility in addressing landowner requests and concerns.

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
Initial Requests for Information
Dated November 12, 2008**

Case No. 2008-00457

Question No. 10

Witness: Chris Hermann / Greg Thomas

- Q-10. Reference the company's response to PSC 2-9 (b) in Case No. 2006-00494, wherein the company stated it is capable of determining tree outage information by circuit number, the date, time and duration of each such outage, and a description of the cause of the outage. For each circuit in which the power outage resulting from Hurricane Ike storm-related damage existed for more than four (4) days, provide the last date on which the circuit was inspected for ROW maintenance and VMP needs.
- a. Identify any and all circuits for which the company failed to adhere to the VMP.
 - b. For each circuit in which the power outage resulting from Hurricane Ike storm-related damage existed for more than four (4) days, identify how many fell within the "worst performing circuit plan" set forth on page 4 of the E.ON VMP provided to the PSC in Case No. 2006-00494 (attached in the company's letter to the PSC dated Dec. 19, 2007).
- A-10. Please see the attachment. The "KU Circuit List" identifies 92 circuits on which a customer was without power due to Hurricane Ike damage for more than four (4) days and provides the last date on which the circuit was trimmed.
- a. All circuits comply with the VMP.
 - b. There were no circuits on the attached list that were included in the "worst performing circuit plan."

KU Circuit List						
Company	OpCenter	Local Area	Substation	Circuit	Trim Date	WPC
KU	EAROC	GREENVILLE	BEAVER DAM	1914	Mar-08	
KU	EAROC	GREENVILLE	BEAVER DAM	1916	Sep-08	
KU	EAROC	GREENVILLE	BEAVER DAM NORTH	0918	Sep-08	
KU	EAROC	GREENVILLE	BEAVER DAM NORTH	0919	Dec-04	
KU	EAROC	GREENVILLE	BEECH CREEK	1668	Mar-04	
KU	EAROC	GREENVILLE	BEECH CREEK	1671	Sep-08	
KU	EAROC	GREENVILLE	BEECHMONT	0695	Sep-08	
KU	EAROC	GREENVILLE	BEECHMONT	0696	Sep-08	
KU	EAROC	GREENVILLE	BEVIER	1666	Mar-04	
KU	EAROC	EARLINGTON	BORG-WARNER	1807	Jun-08	
KU	EAROC	GREENVILLE	CALHOUN	1606	Dec-07	
KU	EAROC	GREENVILLE	CALHOUN	1607	Dec-07	
KU	EAROC	EARLINGTON	CEDAR BLUFF	1515	Sep-07	
KU	EAROC	GREENVILLE	CENTRAL CITY	1646	Mar-05	
KU	EAROC	GREENVILLE	CENTRAL CITY	1648	Mar-05	
KU	EAROC	GREENVILLE	CENTRAL CITY SOUTH	1650	Mar-05	
KU	EAROC	GREENVILLE	CENTRAL CITY SOUTH	1651	Mar-05	
KU	EAROC	EARLINGTON	CLAXTON	1518	Sep-07	
KU	EAROC	EARLINGTON	CLAXTON	1519	Sep-07	
KU	EAROC	BARLOW	CLINTON 12KV	1318	Oct-05	
KU	EAROC	EARLINGTON	CROFTON	1492	Mar-08	
KU	EAROC	EARLINGTON	CROSSROADS	0812	Mar-08	
KU	EAROC	EARLINGTON	DANIEL BOONE	0557	Jun-07	
KU	EAROC	EARLINGTON	DAWSON INDUSTRIAL	1533	Sep-07	
KU	EAROC	EARLINGTON	DAWSON SPRINGS	1525	Sep-07	
KU	EAROC	EARLINGTON	DAWSON SPRINGS 12KV	1529	Sep-06	

<u>Company</u>	<u>OpCenter</u>	<u>Local Area</u>	<u>Substation</u>	<u>Circuit</u>	<u>Trim Date</u>	<u>WPC</u>
KU	EAROC	EARLINGTON	DAWSON SPRINGS 12KV	1530	Jun-06	
KU	EAROC	EARLINGTON	DOZIER HEIGHTS	0815	Mar-05	
KU	EAROC	EARLINGTON	DOZIER HEIGHTS	0816	Mar-05	
KU	EAROC	GREENVILLE	DRAKESBORO	1673	Mar-04	
KU	EAROC	GREENVILLE	DRAKESBORO	1674	Mar-04	
KU	EAROC	EARLINGTON	EARLINGTON	1480	Mar-05	
KU	EAROC	EARLINGTON	EARLINGTON	1481	Mar-05	
KU	EAROC	EARLINGTON	EARLINGTON 12KV	1478	Mar-05	
KU	EAROC	EARLINGTON	EAST DIAMOND	0825	Mar-05	
KU	EAROC	EARLINGTON	EAST DIAMOND	0827	Mar-05	
KU	EAROC	GREENVILLE	ECHOLS	1903	Dec-04	
KU	EAROC	EDDYVILLE	EDDYVILLE	0560	Oct-05	
KU	EAROC	EDDYVILLE	FREDONIA	1508	Dec-05	
KU	EAROC	GREENVILLE	GRAHAM	1602	Jun-07	
KU	EAROC	GREENVILLE	GRAHAM	1603	Jun-07	
KU	EAROC	GREENVILLE	GREENVILLE 12KV	1615	Jun-06	
KU	EAROC	GREENVILLE	GREENVILLE NORTH	1327	Dec-06	
KU	EAROC	GREENVILLE	GREENVILLE NORTH	1328	Sep-06	
KU	EAROC	GREENVILLE	GREENVILLE WEST	1618	Mar-07	
KU	EAROC	EARLINGTON	HANSON	0809	Mar-05	
KU	EAROC	EARLINGTON	HANSON	0811	Dec-04	
KU	EAROC	GREENVILLE	HARTFORD	1911	Sep-07	
KU	EAROC	GREENVILLE	HARTFORD	1912	Sep-07	
KU	EAROC	GREENVILLE	HARTFORD	1913	Dec-07	
KU	EAROC	GREENVILLE	ISLAND	1638	Mar-05	
KU	EAROC	EDDYVILLE	KUTTAWA	1502	Oct-05	
KU	EAROC	GREENVILLE	LIVERMORE	1642	Dec-07	

<u>Company</u>	<u>OpCenter</u>	<u>Local Area</u>	<u>Substation</u>	<u>Circuit</u>	<u>Trim Date</u>	<u>WPC</u>
KU	EAROC	GREENVILLE	LIVERMORE	1643	Dec-07	
KU	EAROC	EARLINGTON	MADISONVILLE EAST	1484	Mar-05	
KU	EAROC	EARLINGTON	MANITOU	1451	Mar-05	
KU	EAROC	EARLINGTON	MANNINGTON	1801	Jun-08	
KU	EAROC	EDDYVILLE	MARION SOUTH	1712	Mar-06	
KU	EAROC	EDDYVILLE	MEXICO	1708	Dec-05	
KU	EAROC	EARLINGTON	MORTONS GAP	0822	Jun-05	
KU	EAROC	EARLINGTON	MORTONS GAP	0823	Jun-05	
KU	EAROC	GREENVILLE	MUHLENBERG PRISON	0657	Mar-08	
KU	EAROC	GREENVILLE	NELSON	1690	Sep-04	
KU	EAROC	EARLINGTON	NORTONVILLE	0818	Dec-07	
KU	EAROC	EARLINGTON	NORTONVILLE	0819	Dec-07	
KU	EAROC	GREENVILLE	PERDUE	1497	Mar-05	
KU	EAROC	GREENVILLE	PERDUE	1498	Mar-05	
KU	EAROC	GREENVILLE	POWDERLY	1626	Sep-04	
KU	EAROC	GREENVILLE	RIVERVIEW	1907	Sep-07	
KU	EAROC	EARLINGTON	SENTRY	1454	Mar-04	
KU	EAROC	GREENVILLE	SHAVERS CHAPEL	1609	Jun-04	
KU	EAROC	GREENVILLE	SHAVERS CHAPEL	1612	Jun-04	
KU	EAROC	EARLINGTON	SIXTH VEIN	1541	Jun-06	
KU	EAROC	EARLINGTON	SIXTH VEIN	1544	Jun-06	
KU	EAROC	EARLINGTON	ST CHARLES	1553	Jun-07	
KU	EAROC	EARLINGTON	ST CHARLES	1554	Sep-07	
KU	EAROC	EARLINGTON	SUNSET 2 2.4KV	1523	Dec-07	
KU	EAROC	EARLINGTON	WHITE PLAINS	0837	Mar-08	
KU	EAROC	EARLINGTON	WHITE PLAINS	0839	Mar-08	
KU	LEXOC	GEORGETOWN	SHADRACK	0476	Jun-08	

<u>Company</u>	<u>OpCenter</u>	<u>Local Area</u>	<u>Substation</u>	<u>Circuit</u>	<u>Trim Date</u>	<u>WPC</u>
KU	SHEOC	CARROLLTON	BEDFORD RECC	0700	Jan-06	
KU	SHEOC	CARROLLTON	CAMPBELLSBURG	0703	Apr-04	
KU	SHEOC	CARROLLTON	CARROLLTON	0704	Apr-06	
KU	SHEOC	CARROLLTON	CARROLLTON	0707	Apr-06	
KU	SHEOC	CARROLLTON	CARROLLTON	0708	Jan-06	
KU	SHEOC	CARROLLTON	CARROLLTON	0709	Oct-07	
KU	SHEOC	SHELBYVILLE	LA GRANGE E 12KV	2509	Oct-07	
KU	SHEOC	SHELBYVILLE	LAGRANGE PENAL	2513	Jan-07	
KU	SHEOC	SHELBYVILLE	LOCKPORT	2531	Apr-04	
KU	SHEOC	CARROLLTON	OWENTON	0725	Oct-07	
KU	SHEOC	CARROLLTON	WARSAW	0728	Sep-07	
KU	SHEOC	CARROLLTON	WARSAW EAST	0872	Jul-07	

KENTUCKY UTILITIES COMPANY

**Response to Attorney General's
Initial Requests for Information
Dated November 12, 2008**

Case No. 2008-00457

Question No. 11

Witness: Chris Hermann / Greg Thomas

Q-11. Given the severity of the damage to the company's system resulting from Hurricane Ike, does the company anticipate any changes to trim cycles for any affected circuits?

A-11. No changes to the trim cycle are anticipated. The VMP includes the flexibility of a multi-cycle strategy to address growth and tree density which will vary across the service area.