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November 9, 2009

RECEIVED

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PUBLIC SERVICE  
COMMISSION

**HAND DELIVERED**

Jeff DeRouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40601

**RE: Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Approval of Depreciation Rates for Trimble County Unit 2**  
**Case No. 2009-00329**

Dear Mr. DeRouen:

Enclosed please find and accept for filing the original and ten copies of Kentucky Utilities Company's and Louisville Gas and Electric Company's Requests for Information to Kentucky Industrial Utility Customers, Inc. in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions please contact me at your convenience.

Sincerely,

  
Kendrick R. Riggs

KRR:ec

Enclosures

cc: Dennis G. Howard II, Assistant Attorney General (w/ encl)  
Michael L. Kurtz, Boehm Kurtz and Lowry (w/ encl)

400001.134411/602410.1

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**In re the Matter of:**

**JOINT APPLICATION OF KENTUCKY )  
UTILITIES COMPANY AND LOUISVILLE )  
GAS AND ELECTRIC COMPANY FOR )  
APPROVAL OF DEPRECIATION RATES )      **CASE NO. 2009-00329**  
FOR TRIMBLE COUNTY UNIT 2 )**

**KENTUCKY UTILITIES COMPANY'S AND  
LOUISVILLE GAS AND ELECTRIC COMPANY'S  
REQUESTS FOR INFORMATION TO  
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") (collectively, the "Companies") respectfully submit the following data requests to the Kentucky Industrial Utility Customers, Inc. ("KIUC") to be answered by the date specified in the Kentucky Public Service Commission's ("Commission") procedural schedule order herein.

**Instructions**

As used herein, "Documents" include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of or accessible to KIUC, its witnesses or counsel.

1. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.

2. These requests shall be deemed continuing so as to require further and supplemental responses if KIUC receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

3. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

4. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

5. If KIUC has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for the Companies as soon as possible.

6. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

7. In the event any document requested has been destroyed or transferred beyond the control of KIUC or any of its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

8. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer the Companies to the record where the document is located.

### **Data Requests**

1. Has Mr. Kollen ever prepared a depreciation study? If the response is “yes”, state the date, the client or person for whom it was prepared and provide a complete copy of the study and all supporting documentation in electronic format.

2. Has Mr. Kollen ever prepared a depreciation study for the Industrial Companies and Groups listed as “Clients Served” in Exhibit \_\_\_LK-1? If the response is “yes”, state the date, the client or person for whom it was prepared and provide a complete copy of the study and all supporting documentation in electronic format.

3. Has Mr. Kollen ever prepared a depreciation study for the Regulatory Commissions and Government Agencies listed as “Clients Served” in Exhibit \_\_\_LK-1? If the response is “yes”, state the date, the client or person for whom it was prepared and provide a complete copy of the study and all supporting documentation in electronic format.

4. Has Mr. Kollen ever prepared a depreciation study for the Utilities listed as “Clients Served” in Exhibit \_\_\_LK-1? If the response is “yes”, state the date, the client or person for whom it was prepared and provide a complete copy of the study and all supporting documentation in electronic format.

5. Has Mr. Kollen ever prepared and submitted testimony on a depreciation study submitted by another party in any regulatory proceeding? If the response is “yes”, indicate the jurisdiction and docket number and provide a copy of all the testimony (ies) and exhibits.

6. Has Mr. Kollen ever prepared and submitted testimony on the inclusion or omission or otherwise use of interim retirements, terminal retirements or salvage value in a depreciation study submitted by another party or a depreciation study prepared by him in any regulatory proceeding? If the response is “yes”, indicate the jurisdiction and docket number and provide a copy of all the testimony (ies) and exhibits.

7. Is Mr. Kollen now or has he ever been a member of the Society of Depreciation Professionals?

8. Has Mr. Kollen ever taken the certification examination administered by the Society of Depreciation Professionals? If so, please state each time Mr. Kollen took the examination and the results.

9. Has Mr. Kollen attended any specific classes on or training in the preparation of depreciation studies or depreciation rates? If so, please state each time, including date and location, Mr. Kollen attended the specific classes on or training in the preparation of depreciation studies or depreciation rates.

10. Is Mr. Kollen a member of any utility industry professional organization that has adopted a code of ethics or standards of professional conduct for its members? If so, please state each such organization and provide a copy of its code of ethics or standards of professional conduct for its members.

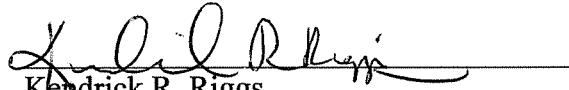
11. Provide a complete copy of all of Mr. Kollen's work papers, including electronic copies of Excel spreadsheets with formulas, cell references, macros, and any VBA code intact, and any source documents, handwritten notes and calculations. Such work papers should include all schedules and underlying computations and work papers developed in the analysis by KIUC of KU's and LG&E's proposed depreciation rates for Trimble County 2 and for all units relied upon in the development of the rates for Trimble County 2.

12. In reference to page 9, lines 17-19 of Mr. Kollen's testimony, please provide all testimony and documentation from Case No. 2007-00564 which demonstrate the KIUC strongly opposed LG&E's proposed net salvage rates and argued that they were significantly overstated.

13. When preparing his testimony, did Mr. Kollen consult any authoritative treatises, books or papers on the subject of depreciation? If so, please state each and every authority consulted Mr. Kollen and state specifically the portion(s) of the authority consulted.

Dated: November 9, 2009

Respectfully submitted,



Kendrick R. Riggs  
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Allyson K. Sturgeon  
Senior Corporate Attorney  
E.ON U.S. LLC  
220 West Main Street  
Louisville, Kentucky 40202  
Telephone: (502) 627-2088


Counsel for Kentucky Utilities Company  
and Louisville Gas and Electric Company

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing Requests for Information to Kentucky Industrial Utility Customers, Inc. was served upon the following persons by United States mail, postage prepaid, on the 9th day of November, 2009:

Michael L. Kurtz  
Kurt J. Boehm  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202

Dennis G. Howard II  
Lawrence W. Cook  
Paul D. Adams  
Assistant Attorneys General  
Office of the Kentucky Attorney General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601-8204

  
\_\_\_\_\_  
Counsel for Kentucky Utilities Company  
and Louisville Gas and Electric Company