

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN)
ADJUSTMENT OF BASE RATES)

✓ CASE NO. 2009-00548

In the Matter of:

APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS ELECTRIC)
AND GAS BASE RATES)

CASE NO. 2009-00549

**DATA REQUESTS OF KENTUCKY UTILITIES COMPANY
AND LOUISVILLE GAS AND ELECTRIC COMPANY
TO THE KROGER COMPANY**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, the “Companies”) respectfully submit the following data requests to the Kroger Company (“Kroger”) 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 Kroger, its witnesses or counsel.

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

B. These requests shall be deemed continuing so as to require further and supplemental responses if Kroger 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.

C. 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.

D. 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.

E. If Kroger 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.

F. 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.

G. In the event any document requested has been destroyed or transferred beyond the control of Kroger 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.

H. 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. To the extent not previously provided, please provide electronic copies (on CD) of all tables, charts, diagrams, schedules, and exhibits (collectively, “Exhibits”) contained in the testimony of all witnesses for Kroger. Please include all workpapers, schedules, underlying computations and supporting documentation used and relied upon by each witness in the preparation of his or her testimony, including the preparation of all Exhibits. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.
2. To the extent not previously provided, please provide copies of all schedules and underlying computations and workpapers developed in the analysis by Kroger and/or its witness(es) of the Companies’ requested rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the analyses of the revenue requirement components and computations, including all ratemaking adjustments to the historic data, and the cost of service model.

Mr. Townsend

3. Mr. Townsend’s testimony refers to Consumers Energy Company and Detroit Edison conjunctive demand/generation aggregation pilot programs in Michigan. Please provide all information Mr. Townsend relied upon, and any other information Mr. Townsend is aware of and can provide, concerning these programs, including, but not limited to, relevant tariff sheets, administrative filings, and regulatory commission orders. Please confirm that the programs to which Mr. Townsend’s testimony refers are active programs for customers of Consumers Energy Company and Detroit Edison.

Dated: May 6, 2010

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the following persons on the 6th day of May, 2010, by United States mail, postage prepaid:

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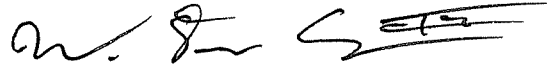
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