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August 16, 2010

RECEIVED

VIA HAND DELIVERY

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

AUG 16 2010

PUBLIC SERVICE COMMISSION

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The Application of PPL Corporation, E.ON AG, E.ON US Investments Corp., E.ON U.S. LLC, Louisville Gas and Electric Company and Kentucky Utilities Company for Approval of an Acquisition of Ownership and Control of Utilities Case No. 2010-00204

Dear Mr. DeRouen:

Enclosed please find, for filing, the original and twelve copies of the Data Requests of PPL Corporation, E.ON AG, E.ON US Investments Corp., E.ON U.S. LLC, Louisville Gas and Electric Company and Kentucky Utilities Company propounded to the Kentucky School Board Association 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

Yours very truly,

Kendrick R. Riggs

KRR:ec **Enclosures**

cc:

Parties of Record

400001.137417/648025.1

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF PPL CORPORATION,)	
E.ON AG, E.ON US INVESTMENTS CORP.,)	
E.ON U.S. LLC, LOUISVILLE GAS AND ELECTRIC)	CASE NO.
COMPANY AND KENTUCKY UTILITIES)	2010-00204
COMPANY FOR APPROVAL OF AN ACQUISITION)	
OF OWNERSHIP AND CONTROL OF UTILITIES)	

DATA REQUESTS OF PPL CORPORATION, E.ON AG, E.ON US INVESTMENTS CORP., E.ON U.S. LLC, LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY PROPOUNDED TO THE KENTUCKY SCHOOL BOARD ASSOCIATION

PPL Corporation ("PPL"), E.ON AG ("E.ON"), E.ON US Investments Corp. ("E.ON US Investments"), E.ON U.S. LLC ("E.ON U.S."), Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") respectfully submit the following data requests to the Kentucky School Board Association (the "Association"), to be answered by the date specified in the procedural schedule ordered by the Kentucky Public Service Commission ("Commission") in this matter.

Instructions

- 1. 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, the Association, its witness, or its counsel.
- 2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

- 3. These requests shall be deemed continuing so as to require further and supplemental responses if the Association 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.
- 4. 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.
- 5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.
- 6. If the Association objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.
- 7. 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.
- 8. In the event any document requested has been destroyed or transferred beyond the control of the Association, its counsel, or its witness, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

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

Data Requests

- 1. Please state whether the testimony of Charles D. Buechel on behalf of the Association, which includes a request for "further clarification and confirmation regarding the continuity of Rate AES," is meant to request a modification of the stipulation agreed to by the parties, and approved by the Commission just last month, in KU's most recent rate case, Case No. 2009-00548.
- 2. Please explain why the Association believes it is appropriate to raise questions regarding Rate AES, or any other rate, in this change of control proceeding rather than in KU's next rate case.
- 3. Is it the position of the Association that the Commission can conduct a rate investigation into the existing and approved rates of LG&E and KU in connection with this change in control proceeding?

Dated: August 16, 2010

Respectfully submitted,

Respectfully submitted,

Richard Northern

Richard Northern *b* Francis J. Mellen, Jr.

Frank F. Chuppe

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- and -

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Counsel for E.ON AG, E.ON US Investments Corp., E.ON U.S. LLC, Louisville Gas and Electric Company and Kentucky Utilities Company

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Data Requests was served upon the following individuals by first class United States mail, postage prepaid, on the 16th day of August 2010:

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> Counsel for E.ON AG, E.ON US Investments Corp., E.ON U.S. LLC, Louisville Gas and Electric Company and Kentucky Utilities Company