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 COMPANY, AND)	CASE NO.
KENTUCKY UTILITIES COMPANY FOR APPROVAL OF)	2010-00204
AN ACQUISITION OF OWNERSHIP AND CONTROL OF)	
UTILITIES)	

COMMISSION STAFF'S FIRST INFORMATION REQUEST TO COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON, HARRISON, AND NICHOLAS COUNTIES, INC.

The Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. ("CAC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than August 27, 2010. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

CAC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which CAC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

- 1. Refer to page 12 of the Direct Testimony of Jack E. Burch ("Burch Testimony), lines 1-10, where Mr. Burch indicates the regulatory commitment that no workforce reductions should be expanded to include contractors and sub-contractors. Given that Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") have no direct control of the number of people employed by either contractors or subcontractors with whom they do business and, with the most likely alternative, if there are reductions in the number of contract workers, being an increase in the number of in-house employees, explain how LG&E and KU would be able to plan the work on major construction projects if this particular regulatory commitment were to be expanded as suggested by Mr. Burch.
- 2. Refer to pages 18 and 19 of the Burch Testimony. Beginning on line 20 of page 18, Mr. Burch states that PPL Corporation's On Track program provides a payment plan for low-income customers which makes energy bills more affordable based on family size, income and usage. Mr. Burch encourages the Commission to

make an extension of the On Track program to KU's and LG&E's customers a condition of the acquisition approval. Explain whether Mr. Burch is familiar with the provisions of KRS 278.170 which prohibit discrimination as to utility rates and service.

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED AUG 1 6 2010

cc: Parties of Record

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