

# HURT, CROSBIE & MAY PLLC

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August 27, 2010

RECEIVED

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PUBLIC SERVICE  
COMMISSION

*Via Hand-Delivery*

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

RE: *Case No. 2010-00204*

Dear Mr. Derouen:

Please find enclosed the original and twelve (12) copies of the Kentucky School Board Association's Data Request Responses of KSBA to Joint Applicants filed in this matter. By copy of this letter, all parties listed on the Certificate of Service have been served.

Please place the document of file.

Regards,



Matthew Malone

C: File

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the matter of: : CASE NO. 2010-00204

JOINT APPLICATION OF PPL CORPORATION :  
E.ON AG, E.ON US INVESTMENTS CORP., E.ON :  
US. LLC, LOUISVILLE GAS AND ELECTRIC :  
COMPANY AND KENTUCKY UTILITIES :  
COMPANY FOR APPROVAL OF AN ACQUISITION :  
OF OWNERSHIP AND CONTROL OF UTILITIES :

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**KENTUCKY SCHOOL BOARDS ASSOCIATION'S CERTIFICATE OF SERVICE  
REGARDING DATA REQUESTS RESPONSES OF KSBA TO JOINT APPLICANTS**

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Comes the Kentucky School Boards Association, by counsel, and hereby certifies that an original and twelve (12) copies of the attached data request responses to the Joint Applicants were served via hand-delivery upon Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail, postage prepaid, on the following, and by electronic mail where available all on this 27<sup>th</sup> day of August, 2010.

Hon. David C. Brown  
Stites & Harbison, PLLC  
1800 Providian Center  
400 West Market Street  
Louisville, Kentucky 40202

Hon. Michael L. Kurtz  
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Hon. Dennis G. Howard, II  
Hon. Lawrence W. Cook  
Assistant Attorney General  
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Utility and Rate Intervention Division  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204

Hon. Iris G. Skidmore  
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Hon. Allyson K. Sturgeon  
Senior Corporate Attorney  
E.ON U.S. LLC  
220 W. Main Street  
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Hon. Lonnie E. Bellar  
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Counsel for the Petitioner,  
**KENTUCKY SCHOOL BOARDS ASSOCIATION**

VERIFICATION

Comes the undersigned, Charles D. Buechel, being duly sworn, deposes and states that he is President of Utility and Economic Consulting, Inc., that he has personal knowledge of the matters set forth in the attached responses on behalf of the Kentucky School Boards Association for which he is identified as a witness, and the answers contained therein are true and correct to the best of his knowledge.

*Charles D. Buechel*

Charles D. Buechel

COMMONWEALTH OF KENTUCKY )

)

COUNTY OF FAYETTE )

)

Subscribed and sworn to me this 25<sup>th</sup> day of August 2010, by Charles Buechel.

*Emily Jennings Williams*

Notary Public

My Commission Expires: 11/21/2011



**Joint Applicants: PPL Corp., E.ON, LG&E and KU**

**CASE NO. 2010-00204**

**Response to Joint Applicants' First Data Request  
Dated August 25, 2010**

**Question 1**

**Responding Witness: Charles D. Buechel on behalf of KSBA**

Q-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.

A-1. KSBA is not requesting a modification to the stipulation. KSBA's concern is that KU may choose to entirely eliminate the AES tariff in some future rate proceeding. During some KSBA members' discussions with various KU personnel, this possibility of eliminating the AES tariff has been mentioned. Before the schools commit resources to various energy saving programs they would like some assurance that the AES tariff will remain in effect indefinitely.





**Joint Applicants: PPL Corp., E.ON, LG&E and KU**

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**Question 2**

**Responding Witness: Charles D. Buechel on behalf of KSBA**

Q-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.

A-2. These matters will certainly be raised in KU's future rate cases, however KBSA's primary concern is the possible elimination of the AES rate in the future and the potential "unintended consequences" that can occur when large groups of customers are migrated to different tariffs.



**Joint Applicants: PPL Corp., E.ON, LG&E and KU**

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**Question 3**

**Responding Witness: Charles D. Buechel on behalf of KSBA**

Q-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?

A-3. No.