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Jeff Derouen, Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

**Re: Case No. 2010-00204
Notice of Intent of PPL Corporation, E.on AG, E.on U.S. LLC, Louisville Gas
& Electric Company and Kentucky Utilities Company to File a Joint
Application for Approval of the Acquisition by PPL Corporation**

Dear Mr. Derouen:

Enclosed is an original and ten copies of Supplemental Data Requests by International Brotherhood of Electrical Workers, Local 2100.

Very truly yours,

Sheila Sprinkle
Assistant to Don Meade

Enclosure

RECEIVED

JUL 15 2010

PUBLIC SERVICE
COMMISSION

PETER J. NAAKE
EVERETT C. HOFFMAN +++
THOMAS J. SCHULZ
MICHELE HENRY
MARSHALL B. HARDY, JR., OF COUNSEL

July 14, 2010

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 15 2010

PUBLIC SERVICE
COMMISSION

In the Matter of:

NOTICE OF INTENT OF PPL CORPORATION,)
E.ON AG, E.ON U.S. LLC, LOUISVILLE GAS)
AND ELECTRIC COMPANY AND KENTUCKY)
UTILITIES COMPANY TO FILE A JOINT)
APPLICATION FOR APPROVAL OF THE)
ACQUISITION BY PPL CORPORATION)

Case No. 2010-00204

SUPPLEMENTAL DATA REQUESTS
FROM INTERVENOR IBEW, LOCAL 2100

Comes the bargaining unit representative of the unionized employees of LG&E and submits its Supplemental Data Requests to the joint applicants to be answered in accord with the following. Any reference to LG&E or acquired companies should be treated as a joint reference to LG&E/KU.

1. With respect to PPL's answer to Attorney General Question No. 64, if there is no current plan for workforce reductions, and no current plan to develop a workforce reduction, and LG&E already has implemented all best practices of which it has considered, and no best practices are being considered for implementation, and PPL is planning to keep the same management team in place, and the acquisition is not based upon assumptions of synergies being achieved that would result in workforce reduction, please articulate the business justification for PPL's refusal to enter into a commitment that there will be no workforce reductions as a direct consequence of the acquisition?

2. With regard to the applicant's answer to IBEW Question 5, if no workforce reductions are planned, and there is no plan to develop a plan of workforce reductions based

upon anticipated synergies, why is it necessary for the company to make commitments No. 27 and 28 which both offer assurances for continued quality of service if workforce reductions are implemented?

3. With regard to the applicant's response to IBEW Question 6, the data furnished indicates that 1,072 grievances were filed between 2007 and 2009. Please answer the following questions:

- A. How many grievances have been filed to date of the company's answer in 2010?
- B. Of the 1,152 grievances that remain open, how many of them are more than two years old?
- C. Does the applicant consider the track record grievance resolution, as described by the data in its answer to Question 6, to be an example of the type of constructive relationship with labor organizations it expects to maintain with IBEW 2100?
- D. Describe what efforts, such as union/company task force, state agency mediation or resort to other services, have been utilized in the last three years to address the existence of over 1000 outstanding grievances between the company's subsidiary and Local 1600.
- E. Produce a copy of all the arbitration decisions which have been rendered from 2007 to date. (This should be a total of 11, unless additional cases have been heard in 2010).

4. In the last 10 years, have any of the company's subsidiaries implemented early retirement incentive programs which had the result of reducing the total number of operational jobs, whether union or non-union? If so, state the following:

- A. Identify each facility where such a plan was offered;
- B. Identify the total number of employees that accepted the plan;


- C. State the total number of operational jobs that existed before the plan was implemented, and the total number of jobs that existed after the plan was implemented;
 - D. State the total number of operational jobs that exist in 2010 at that facility; and
 - E. Summarize the terms of the early retirement incentive plan that was utilized at the facility.
5. Regarding the applicant's answer to IBEW Question 17, for all capital construction projects undertaken by PPL subsidiaries in the United States in the last 10 years, whether for construction of new facilities or construction on existing facilities, state the following:
- A. The total number of projects undertaken by PPL;
 - B. The number of projects which were performed under a project labor agreement negotiated with labor unions; and
 - C. For any projects undertaken pursuant to a negotiated agreement with construction trades, such as a project labor agreement, state the year of the project, the name or description of the project and the subsidiary that undertook the project.
6. With regard to the applicant's response to IBEW Question 20, will the applicant agree that for any future capital construction projects, practices consistent with those used in the RFP for the Trimble County 2 construction, related to conditions for hiring local workers, will be maintained to include:
- A. Efforts to maximize the use of local direct hire union and non-union contractors;
 - B. A requirement to define and utilize processes to maximize the use of local union and non-union MBE and WBE labor, goods and services;
 - C. First preference for the hiring of Kentucky residents for construction jobs; and
 - D. A requirement that local workers be utilized whenever practical and possible, consistent with previous orders of the Kentucky PSC.

7. With regard to the applicant's answer to IBEW Question 22:
 - A. Explain why disclosure of plans for staffing levels of operational employees will place the company at a competitive disadvantage for future contract negotiations;
 - B. Does not LG&E retain the exclusive management prerogative to determine the number of employees it will utilize and retain the management prerogative to increase and decrease that number without regard to the labor agreement with IBEW 2100?
 - C. If PPL has no present plans for employee reductions, no plans to plan for reduction after the acquisition and no expectation of synergies to be achieved as a result of the acquisition, explain why disclosure of LG&E's current projected staffing needs will impair the Company's future rights to make staffing decisions?
8. State the number of employees currently employed at LG&E as of June 30, 2010.

For each of the last 10 years, list the total number of employees at the start of each year, segregated by union operational employees, covered by the IBEW 2100 contract, and all other employees.

Respectfully submitted,

PRIDDY, CUTLER, MILLER & MEADE
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429 W. Muhammad Ali Blvd.
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(502) 587-8600

By 
Don Meade 

CERTIFICATE OF SERVICE AND FILING

Counsel certifies that an original and ten copies of the foregoing Supplemental Data Requests were served by mailing same this 14th day of July, 2010, to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Blvd., Frankfort, KY 40601; furthermore, it was served by mailing a true and correct copy of same, first class postage prepaid, to the attached Service List.


Don Meade

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