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August 16, 2010

VIA HAND DELIVERY

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

RECEIVED

AUG 16 2010

PUBLIC SERVICE
COMMISSION

RE: 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 Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties 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

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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
COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS COUNTIES

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 Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties (“CAC”), 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, CAC, 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 CAC 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 CAC 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 CAC, 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 refer to Mr. Burch's testimony on page 13 that "all of the Kentucky Utilities decision makers are in Louisville" thereby resulting in a "Louisville-centric mindset in the designing of programs and in the ratemaking process." Please also refer to page 15 of Mr. Burch's testimony, particularly the statement that the Customer Commitment Advisory Forum ("CCAF") "consists almost exclusively of Louisville representation."

(a) Is the Council aware that E.ON U.S. sponsors a Consumer Advisory Panel ("CAP") which provides input to the management of LG&E and KU; that the CAP reviews, discusses and offers feedback on customer-related issues within the LG&E and KU service territories; that CAP members are individuals from rural and suburban communities throughout Kentucky, and membership is intended to be representative of the populations served by LG&E and KU; that the CAP conducts roundtable discussions on such topics as electric and natural gas safety, customer perceptions of various company initiatives and potential customer communication channels, such as local extension offices; and that over 90% of the CAP's members are from areas of Kentucky other than Louisville?

2. Please refer to Mr. Burch's testimony at page 15 that the companies "possess no expertise" in the field of low-income policies.

(a) Is the Council familiar with E.ON U.S.'s Demand Side Management Programs, including WeCare, Project Warm Blitz (LG&E) and Winter Blitz (KU)?

3. Please refer to Mr. Burch's testimony at pages 16 and 17 relating to the OnTrack Program and "statutory or regulatory barriers."

- (a) Is the Council aware that programs such as PPL Electric's OnTrack program are required by Pennsylvania law?
- (b) Is the Council aware that the costs of the OnTrack program are recovered from Pennsylvania ratepayers through an universal service rider or base rates?
- (c) Is it the Council's position that implementing a similar program in Kentucky would require legislation on the part of the General Assembly, or is it the Council's position that the Commission currently has the statutory authority to require implementation of similar programs?
- (d) If it is the Council's position that the Commission currently has authority to implement similar programs, please provide the statutory basis for the Council's understanding.

4. Please refer to Mr. Burch's pre-filed testimony at page 14 regarding the duration of Regulatory Commitment No. 36. Is the Council aware that the Commission also ordered a 10-year commitment in Case No. 2000-095 and Case No. 2001-104?

5. Please refer to Mr. Burch's pre-filed testimony at page 16 that 15 years is not long enough for Regulatory Commitments Nos. 47 and 48. Is the Council aware that the Commission ordered a 10-year commitment in Case No. 2001-104, and that the Commission imposed no residency requirement for corporate officers in Case No. 2000-095?

Dated: August 16, 2010

Respectfully submitted,

By: Richard Northern
Richard Northern *w/ permission KRR*

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Respectfully submitted,

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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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A handwritten signature in black ink, reading "Kenneth R. Piss". The signature is written in a cursive style with a horizontal line underneath.

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