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August 16, 2010

**VIA HAND DELIVERY**

RECEIVED

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

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 Metro Housing Coalition 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 METRO HOUSING COALITION

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 Metro Housing Coalition. (“MHC”), 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, MHC, 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 MHC 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 MHC 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 MHC, 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. Before submitting MHC's pre-filed testimony, did MHC or its counsel seek information about PPL's experience in gas operations other than by reviewing PPL's website?

2. Is MHC aware:

(a) That PPL owned and operated PPL Gas Utilities Corporation ("PPL Gas") until 2008?

(b) That PPL Gas served about 76,000 natural gas distribution customers in 35 counties throughout Pennsylvania and a small area of Maryland, and that the gas utility operated about 3,800 miles of pipeline and owned underground gas storage capacity in three separate reservoirs in north-central Pennsylvania?

(c) That PPL Electric's current Vice President of Customer Services, Robert M. Geneczko, was the President of PPL Gas when it was owned by PPL, or that the President of PPL Electric, David G. DeCampli, had experience managing the operation of a natural gas utility before he joined PPL Electric?

(d) That the existing management of PPL and LG&E has years of managerial experience building, operating and maintaining natural gas utilities.

3. Please refer to page 6 of Cathy Hinko's testimony discussing whether there are "specific areas that could be addressed in the acquisition that would advance the public interest." Please state the basis for Cathy Hinko's position the current DSM program being directed solely by LG&E/E.ON has led to "ineffective and incomplete" programs and a perplexing set of choices for the consumer.

4. Please explain how the Commission would have the statutory jurisdiction or the ability to regulate and maintain proper oversight of the DSM program if the program is “under the control of a board which has representation from the utility company but which is not controlled by the utility company” as suggested at page 6 of Cathy Hinko’s direct testimony.

5. Please refer to Cathy Hinko’s testimony at page 6. Please explain how LG&E/E.ON’s proposal to provide energy education to help reduce energy demand in low-income households fails to provide “real, helpful services to ratepayers?”

- (a) Is it MHC’s position that energy efficiency education does not lead to lower energy bills for customers?
- (b) Would low-income ratepayers be better off without energy efficiency education?

6. Please refer to Cathy Hinko’s pre-filed testimony at page 8.

- (a) Is MHC aware that programs such as PPL Electric’s OnTrack, WRAP and WRAP Solar Water Heating Program are required by Pennsylvania law?
- (b) Is MHC aware that the costs of these programs are funded by Pennsylvania ratepayers in the form of either a universal service rider or base rates?
- (c) Is it MHC’s position that implementing similar programs in Kentucky would require legislative action on the part of the General Assembly, or is it MHC’s position that the Commission currently has the statutory authority to require implementation of similar programs?

(d) If it is MHC's position that the Commission currently has authority to implement similar programs, please provide the statutory basis for MHC's understanding.

7. Please explain in detail how MHC proposes that implementation of programs similar to OnTrack, WRAP and WRAP Solar Water Heating Program in Kentucky should be funded. Please also state how much funding MHC estimates would be required for LG&E to operate each of these programs on an annual basis.

8. Please explain how implementing a program similar to PPL Electric's WRAP program, which provides energy audits and weatherization services, would not be duplicative of programs already in existence that provide the same services.

9. Does LG&E currently operate any programs that MHC believes are effective in helping low-income customers? If so, please list each such program and explain why MHC believes the program is effective.

10. Please refer to page 8 of Cathy Hinko's pre-filed testimony regarding purported internal pressure for PPL to switch customers from gas to electric utility services.

(a) Please state the basis for Ms. Hinko's claim.

(b) Please produce all documents upon which MHC relies to support this claim.

Dated: August 16, 2010

Respectfully submitted,

By: Richard Northern  
Richard Northern *by permission KRR*

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– and –

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Respectfully submitted,

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*Counsel for E.ON AG, E.ON US  
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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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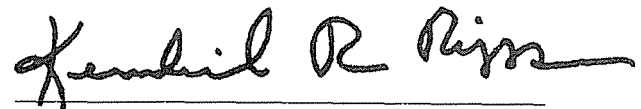
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A handwritten signature in black ink, reading "Kenneth R. Rynn". The signature is written in a cursive style with a horizontal line underneath the name.

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