

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 THE KENTUCKY SCHOOL BOARDS ASSOCIATION

The Kentucky School Boards Association ("KSBA"), 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.

KSBA 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 KSBA 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 lines 10-13 on page 4 of the Testimony of Charles D. Buechel ("Buechel Testimony"). Based on this statement, state whether it is KSBA's belief that Kentucky Utilities Company ("KU") can disregard Section 5.24 of the Stipulation and Settlement, which the Commission approved in Case No. 2009-00548.¹ Explain.

2. Refer to lines 14-20 on page 4 of the Buechel Testimony. Describe the type of information that schools referenced in the testimony are currently receiving from either KU or Louisville Gas and Electric Company.

3. Refer to line 16 on page 6 to line 2 on page 7 of the Buechel Testimony. Explain whether KSBA is suggesting that any future rate increases in KU's All Electric Schools rate should be "[c]onsistent with the majority of other tariff changes" regardless of cost-of-service results or other factors that come into play in the ratemaking process.

4. Refer to lines 3-15 on page 7 of the Buechel Testimony which reference "[t]he elimination of Rate GS-Primary" and its effect on the bills of schools using ball field or stadium lights. KU's tariffs prior to Case No. 2009-00548 did not include a Rate

¹ Case No. 2009-00548, Application of Kentucky Utilities Company for an Adjustment of Base Rates (Ky. PSC Jul. 30, 2010).

GS-Primary. State whether Mr. Buechel intended to refer to another rate or is referring to a tariff revision that preceded Case No. 2009-00548.



Jeff Derouen
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DATED AUG 16 2010

cc: Parties of Record

Case No. 2010-00204

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