

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR PERMANENT)	CASE NO. 2009-00172
APPROVAL OF ITS GAS WEATHER)	
NORMALIZATION ADJUSTMENT CLAUSE)	

INITIAL DATA REQUEST OF COMMISSION
STAFF TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due within seven days from the date of this request. 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.

LG&E 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

LG&E fails or refuses to furnish all or part of the requested information, LG&E 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Unless instructed otherwise, provide the following information for the months covered by LG&E's Weather Normalization Adjustment tariff ("WNA") for the three most recent winter heating seasons:

a. On a monthly basis, for both RGS and CGS customers, the number of customers billed under the provisions of LG&E's WNA.

b. Monthly Mcf sales, shown separately for residential and non-residential customers, and in total for both customer groups. In comparative form, show (1) actual metered sales volumes and (2) adjusted sales volumes as billed under the provisions of LG&E's WNA.

c. On a monthly basis, for both RGS and CGS customers, average usage per customer based on (1) metered sales volumes and (2) adjusted sales volumes as billed under the provisions of LG&E's WNA. Provide this information for the period covered by the WNA and provide average usage per customer in comparative form using the same format, based on metered sales for the same calendar month in each of the past three heating seasons.

d. Monthly base rate revenues, shown separately for RGS and CGS customers, and in total for both customer groups. In comparative form, show base rate revenues, calculated based on metered sales volumes and actual revenues as billed to customers under the provisions of LG&E's WNA.

e. Monthly heating degree days, reported as follows: (1) normal calendar heating degree days; (2) actual calendar heating degree days; (3) normal billed heating degree days; and (4) actual billed heating degree days. Explain the differences between calendar and billed heating degree days including, but not limited to, a narrative description of LG&E's meter reading cycles, billing cycles, etc.

2. For each of the last five calendar years, provide LG&E's return on common equity for its gas operations based on (1) calculated revenues as if the WNA had not been in effect and (2) actual revenues with the WNA in effect. Show the return calculation, including the net income available for common stock and the equity balance used in the calculation. The return calculation should be based on an end-of-period equity balance like that used by the Commission in general rate cases. For this response, it will not be necessary to allocate common equity based on the ratios of electric and gas rate bases, as LG&E does in its general rate cases. For simplicity's sake, it will be sufficient to perform the equity allocation based on the ratios of net electric plant and net gas plant in service.

3. LG&E's base rates are intended to recover non-gas costs such as billing, maintenance, depreciation, taxes, etc. Provide a narrative description of the portion of LG&E's non-gas costs that vary as usage varies.



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Public Service Commission
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DATED: MAY 22 2009

cc: All Parties

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