## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC	)	
COMPANY FOR APPROVAL OF LAND EXCHANGE	)	CASE NO.
WITH LOUISVILLE/JEFFERSON COUNTY METRO	)	2011-00435
GOVERNMENT	j	

## FIRST INFORMATION REQUEST OF COMMISSION STAFF TO LOUISVILLE GAS AND ELECTRIC COMPANY

Pursuant to 807 KAR 5:001, Louisville Gas and Electric Company ("LG&E") 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 fifteen days following 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 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 should 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. Provide documentation to support the fair market values for both the LG&E and the Louisville/Jefferson County Metro Government ("Louisville Metro") parcels that are to be exchanged.
- 2. State whether there are any structures, equipment or security fencing on LG&E's parcels that will require removal prior to Louisville Metro taking ownership. If so, provide an estimate of the removal costs and any other expenses that might be incurred related to the exchange.
- 3. Explain how it was decided which parcels would be included as part of the land exchange with Louisville Metro.
- 4. The total size of the three parcels of land that LG&E has agreed to swap with Louisville Metro is approximately 7 acres. The Louisville Metro property to be swapped is approximately 17 acres. The current fair market value of the Louisville Metro property is \$56,400 more than the LG&E parcels. Explain why LG&E agreed to

accept a relatively larger parcel of land that is also more expensive rather than agreeing to a like-kind exchange.

J#ff Derøuen

Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED	NOV	3	0	2011	

cc: Parties of Record

Rick E Lovekamp Manager Regulatory Affairs Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40202

Honorable Allyson K Sturgeon Senior Corporate Attorney LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202