COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVISED GAS LINE TRACKER FILING OF LOUISVILLE GAS AND ELECTRIC COMPANY

) CASE NO. 2013-00394

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION 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 eight copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 10 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 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.

1. In Case No. 2012-00222,¹ in which LG&E's gas line tracker ("GLT") was approved by the Commission, LG&E's estimated incremental operations and maintenance ("O&M") expense in the amount of \$1.1 million in the first year, and \$6.1 million over the five-year program, was discussed on page 18 of the Direct Testimony of Chris Hermann.

a. Provide the most recent calculation available of the incremental O&M incurred year-to-date.

b. Explain whether the \$6.1 million estimate for the five-year program is still reasonable.

2. State whether any O&M savings have resulted due to the GLT program. If so, provide the amount of savings and identify the specific exepenses in which savings were realized.

3. Refer to the Direct Testimony of Lonnie E. Bellar ("Bellar Testimony") in Case No. 2012-00222, Bellar Exhibit 1, at page 6. Provide this schedule, which is named GLT Form 1.5, showing forecasted projects for 2014.

¹ Case No. 2012-00222, Application of Louisville Gas and Electric for an Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity, Approval of Ownership of Gas Service Line and Risers, and a Gas Line Surcharge (Ky. PSC Dec 20, 2012).

4. Refer to Exhibit A, page 1, of LG&E's October 31, 2013 GLT tariff filing.

a. Explain why "Total Current Revenue for Year Ended 3/31/2012" was used for the allocations instead of "Total Revenue as Approved in Case No. 2012-00222," as it was used in Bellar Exhibit 1, page 1.

b. Explain whether the allocations of the GLT revenue requirement to customer classes would be different if "Total Revenue as Approved in Case No. 2012-00222" had been used.

c. Explain why only the "Residential Gas Service Number of Bills" is the same as the number of bills in Case No. 2012-00222.

Refer to Exhibit D of the supporting documents of LG&E's October 31,
2013 tariff filing.

a. Explain why "Riser Retirements" in the amount of (\$3,375,560) are shown only in the month of November, rather than being spread over multiple months.

b. The line item "Riser Cost of Removal" shows a \$0 total for each month. State if the costs associated with removing the risers are included in the line item "Service Line Cost of Removal."

6. Identify generally the locations of the major main replacements that have occurred in 2013 and describe how those specific projects were selected and prioritized.

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cc: Parties of Record

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