## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES AND FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY )	)	CASE NO. 2016-00370
ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES AND FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY	)	CASE NO. 2016-00371

## COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

Kentucky Utilities Company and Louisville Gas and Electric Company ("KU/LG&E"), pursuant to 807 KAR 5:001, are to file with the Commission an original and six copies in paper medium and an electronic version of the following information. The information requested herein is due within ten days of the date of this request. Responses to requests for information in paper medium 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.

KU/LG&E shall make timely amendment to any prior response if they obtain 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 KU/LG&E fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their 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. When filling a paper containing personal information, KU/LG&E shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Application, Filing Requirement 807 KAR 5:001, Section 16(8)(g). Using the attached spreadsheets as a guide, respond in Excel workbook format with all columns and rows unprotected and accessible. Provide the following yearly salary and benefit information for each corporate officer and as a group in total by category of Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly for the years 2013 through 2016, the base period and the test period (in gross dollars—not hourly or monthly rates).

Case No. 2016-00370 Case No. 2016-00371

- Regular salary or pay.
- b. Overtime pay.
- Excess vacation payout.
- Standby/Dispatch pay.
- Bonus and incentive pay.
- f. Any other forms of incentives (may include stock options or forms of deferred compensation).
  - g. Other amounts paid and reported on the employees' W-2 (specify).
  - Healthcare benefit cost for employees.
    - Amount paid by employer.
    - (2) Amount paid by employee.
  - i. Dental benefits cost for employees.
    - (1) Amount paid by employer.
    - Amount paid by employee.
  - Vision benefits cost for employees.
    - (1) Amount paid by employer.
    - Amount paid by employee.
  - Life insurance cost for employees.
    - Amount paid by employer.
    - (2) Amount paid by employee.
  - Accidental death and disability benefits.
    - Amount paid by employer.
    - (2) Amount paid by employee.

- m. Defined Contribution 401(k) or similar plan cost for employees.
   Provide the amount paid by employer.
  - n. Defined Benefit Retirement cost for employees.
    - (1) Amount paid by employer.
    - (2) Amount paid by employee.
  - Cost of any other benefit available to an employee (specify).
  - For each item of benefits listed in Item 1 above where an employee is required to pay part of the cost, provide a detailed explanation as to how the employee contribution rate was determined.
- a. Provide, for each salaried position that receives Salary Overtime,
   the employee title and basis for overtime eligibility for that position.
- b. Provide a detailed description of the employee pay category "Standby Pay." Provide also each employee title and the employee responsibilities for each employee title which receives Standby Pay. Include an explanation in the response if the Standby Pay amounts vary by employee.
- c. Explain how a salaried employee can receive both Salary Overtime
   and Standby Pay.
- 4. Provide a listing of all health care plan categories, dental plan categories, and vision plan categories available to corporate officers individually and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees, i.e., single, married no dependents, single parent with dependents, family, etc. Include the associated employee contribution rates and

employer contribution rates of the total premium cost for each category, and each plan's deductible(s) amounts.

- 5. Provide a listing of all life insurance plan categories available to corporate officers individually and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees. Include the associated employee contribution rates and employer contribution rates of the total premium cost for each plan category.
- 6. Provide a listing of all retirement plans categories available to corporate officers individually, and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees. Include the associated employee contribution rates, if any, and employer contribution rates of the total premium cost for each plan category.
- 7. Refer to the Commission's January 24, 2017 Order in a Duke Energy Kentucky, Inc. proceeding, Case No. 2016-00289,¹ page 15, wherein the Commission expressed its concerns about the increasing number of utility demand-side management ("DSM") programs and the associated increase in costs to ratepayers. Given the Commission's concerns expressed in that case, identify each DSM program currently offered by KU/LG&E.
  - 8. For each DSM program identified above, provide:
    - a. The annual cost per program for the past three years;
    - b. The projected annual costs for the next two years; and

<sup>&</sup>lt;sup>1</sup> Electronic Application of Duke Energy Kentucky, Inc. to Amend its Demand Side Management Programs (Ky. PSC Jan. 24, 2017).

c. The Total Resource Cost cost-benefit analysis, along with the supporting calculations.

Talina R. Mathews Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED APR 0 3 2017

cc: Parties of Record

## **APPENDIX**

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NOS. 2016-00370 and 2016-00371 DATED

APR 0 3 2017

Kentucky Utilities Company CONFIDENTIAL - Case NO: 2016-00370 Salary & Benefit Data by Employee -

Year =>

(Provide the Total owde the KY J  Sug(Provide in Total owde the KY J  Nor (Provide in Total owde the KY J  Nor (Provide in Total owde the KY J  Nor (Provide in Total owde the KY J  Nor (Provide in Total owde the KY J  Nor (Provide in Total owde the KY J  Nor (Provide in Total owde the KY J  (Provide in Total owde the	Title	Regular	Overtime		Standby	Bonus	Other	Sub-Total	Health Benefits Cost									O&D	4	01k		d Benefit rement	Any Other Wage, Salary, Compensation of Benefit		Total	IS
				Payout	-	-			KU	Employee	KU	Employee	KU	Employee	KU	Employee	KU	Employee	KU	Employee	KU	Employee	Not Listed	KU		Employe
Corp	orate Officers																									
(Provi	ide Individually)							The Vertical																	Ello II	m wine
rovide the Tol	otal Amount							SVETTINE.	7															S	- 5	S -
rovide the KY	Jurisdictional Retail Amou	int																						S	- 5	5
								I PERMIT																	mes e	ANN NE
otal Amount i	For All Officers																							\$	- 5	5 -
otal for All - K	KY Jurisdictional Retail Am	ount						A CONTRACTOR																5	- 5	Sámue
																								NA S		
	Directors							EAST-LAND	1																	
(Provide in	Total as a Category)							/ Antilian p																	and 9	
								AMILE NAME OF																\$	- \$	
rovide the KY	/ Jurisdictional Retail Amou	int						rism like																\$	- 5	5
																										والربالة ا
	Managers																							V COLOR		7
	Total as a Category)																								STILL IT	S SILVE
rovide the Tot	ital Amount							No. of Lot, House, etc., in such such such such such such such such	8															\$	- 5	5 -
rovide the KY	Jurisdictional Retail Amou	unt						FINE DE																5	- \$	\$
				-																						
	upervisors																								<b>国际</b>	MASSIF
	Total as a Category)																									
CONTRACTOR CONTRACTOR AND ADDRESS OF THE PARTY OF THE PAR								Annual Control																\$ -	- 5	
rovide the KY	/ Jurisdictional Retail Amou	int						in mark																\$	- 5	s -
	Exempt		-	_	-	-			_	-				-												
			-	-	-	_	_	Addison to the same of	_	-		+										_				
			_	_	-	-		-	_	_		-		-						_		_				
	Jurisdictional Retail Amou	ent.	-	_	-	-				_		+													- S	
TOVIDE THE K.T.	Jurisdictional Retail Amou	int	-	-	-	-			_	_		_										_		\$ -	- \$	
N/	on-Exempt		_		+	-				_		-										_		Market	20 0	- NICEN
	Total as a Category)		_		+	_			-	_		+										_				
					_	_						+	_													\$ -
	Jurisdictional Retail Amou	unt		_	+					-		<del>                                     </del>		-				_		_		_			- \$	
TO VIGO THE TOTAL	Durisdictional (Vetali Allifot	art.			_						_	<del>     </del>												9	3	
	Union							CONTRACTOR OF THE PARTY			_	_														
(Provide in	Total as a Category)				_							1														
																								\$	- s	
	Jurisdictional Retail Amou	int			_							<del>                                     </del>												CORP. LINES CO. LEGISLANIA	Š	The same of the sa
		-						Partie a																		
Non-	-Union Hourly																									-
	Total as a Category)																								200	-
																								5 .	- S	
rovide the KY	Jurisdictional Retail Amou	int																						\$ -		
T		-																								
																								SV DEC		WILL ST
	or All Categories																								EX I	
otal Amount		\$ -	2 .	5 -	5 -	\$ -	\$ .	5 -	\$ -	5 -	5 -	\$ -	\$ -	5 .	\$ -	\$ -	\$ -	\$ -	\$ .	\$ -	5 -	\$ -		5	- 5	
otal KY Jurisd	dictional Retail Amount	\$	5 -	15 -	\$ -	15 -	\$ .	\$ -	15 .	15 -	5 -	15 -	\$ .	5 -	\$ .			I BOUGH	Sala	S -	5 .	\$ -	\$	\$	- 5	-

Louisville Gas and Electric Company CONFIDENTIAL - Case NO: 2016-00371 Salary & Benefit Data by Employee -

Employee Name	Title	Regular	Overtime	Excess Vacation Payout	Standby	Bonus	Other	Sub-Total	Health Benefits Cost		Dental Benefits		fits Vision		n Life Insurai		Al	D&D	4	01k		d Benefit rement	Any Other Wage, Salary, Compensation of	Te	otals
rvarne							-		LG&E	Employee	LG&E	Employee	LG8E	Employee	LG&E	Employee	LG&E	Employee	LG&E	Employee	LG&E	Employee	Benefit Not Listed	LG&E	Employ
Cor	rporate Officers					_					_					_	_	_		_		-			
	ovide Individually)					1		NAME OF TAXABLE PARTY.																	
	Total Amount																							\$ .	S
	Amount for Electric Operation	ons						I Company																\$ -	\$
	Amount for Gas Operations							District.								_								5	S
								THE PERSON NAMED IN																A PARK TON	
tal Amoun	nt For All Officers																							\$ -	5
tai for All	- Electric Operations							** N																S -	5
tal for All -	- Gas Operations																							\$	\$
																								NAME OF TAXABLE PARTY.	
	Directors							Name and Address of the Owner, where the Owner, which is the Owner, where the Owner, which is the Owner, where the Owner, which is the Owner, whic																NO LEGIS	
(Provide ii	in Total as a Category)							S. Sandara														1		Year and the	
	Total Amount							The State of																\$ 1	S
	Amount for Electric Operation	ons						-																5 -	\$
	Amount for Gas Operations							distribution and																\$ -	\$
																								LA CAS	
	Managers																							THE PARTY	The same
(Provide ii	in Total as a Category)																							The last	DEPTH.
	Total Amount							-																\$ -	S
	Amount for Electric Operation	ons																						5 -	S
	Amount for Gas Operations																							\$ -	S
								W-12																District of the last	
	Supervisors							F-100-100-100-100-100-100-100-100-100-10																The second of	
	in Total as a Category)							BANK THE S																Village	NO.
	Total Amount							Name of Street												1				S -	S
rovide the A	Amount for Electric Operation	ons						-																\$	S
rovide the A	Amount for Gas Operations							and the same of																\$ -	S
								1																The second	
	Exempt																							AUGUSTA CO	Mark No.
(Provide in	in Total as a Category)																							Marie No.	<b>MINUS</b>
	Total Amount							THE REAL PROPERTY.																5 -	S
rovide the A	Amount for Electric Operation	ons																						\$ -	5
rovide the A	Amount for Gas Operations	0						THE RESERVE																	\$
	Non-Exempt		-					No. of Contract of																OF THE REAL PROPERTY.	
(Provide ii	in Total as a Category)																							Date of the last	
rovide the T	Total Amount							Manager 1																\$ -	\$
rovide the A	Amount for Electric Operation	ons						0																5 -	\$
rovide the A	Amount for Gas Operations							Lancie L																\$ -	\$
																								(EB) (CANADA (EB)	A CONTRACTOR
	Union																								
	in Total as a Category)							ESATATO!																	
	Total Amount							FG-15.																S -	\$
	Amount for Electric Operation																							\$ -	\$
ovide the A	Amount for Gas Operations							S. British																\$ -	S
No	n-Union Hourly																								TO NAME OF THE PARTY OF
	n Total as a Category)																							SECOND COM	The same of
	Total Amount							1000 HR 10																\$ -	\$
	Amount for Electric Operation							ALTERNA																s -	\$
ovide the A	Amount for Gas Operations							1000																\$ -	\$
								A ROTE OF																WEST THE	O SE
								<b>HURANIE</b>																RAY OF THE	
	for All Categories																							DANE S	LE, SE
otal Amoun	nt	\$ -	\$ -	5 .	\$ -	5 -	\$ -	5 -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ .	\$	5 .	\$ -	\$ -	\$	\$ -	\$ -	\$ -	\$		\$
otal Amoun	nt for Electric Operations	5 .	\$ .	5 .	5 .	5 -	\$ -	Silliani		3	\$ -	\$ -	\$ -	5 .	5	\$	\$ .	\$ .	5	\$ .	5 -	\$ .	S Sales of the Control	\$ 100	\$
And Armouse	nt for Gas Operations	\$ -	3		5 -	\$ -		5	\$ -	\$ -	PERSONAL PROPERTY.	\$ -	N. SHILLIAM	AT WHITE SHOWS	Name and Address of the Owner, where	Contract of the last	OF SHIPPING	I de la companya della companya della companya de la companya della companya dell	STREET, SQUARE, SQUARE	No. of Concession, Name of Street, or other Designation, or other	The Real Property lies	\$ -	5	\$ -	De la Constitución de la Constit

\*Andrea C Brown Lexington-Fayette Urban County Government Department Of Law 200 East Main Street Lexington, KENTUCKY 40507 \*Carrie A Ross Sheppard Mullin Richter & Hampton LLP 1300 I Street NW 11th Floor East Washington, DISTRICT OF COLUMBIA 20005 \*Janet M Graham Commissioner of Law Lexington-Fayette Urban County Government Department Of Law 200 East Main Street Lexington, KENTUCKY 40507

\*Honorable Allyson K Sturgeon Senior Corporate Attorney LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202 \*Cheryl Winn Waters Law Group, PLLC 12802 Townepark Way, Suite 200 Louisville, KENTUCKY 40243 \*Jody Kyler Cohn Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202

\*Honorable Iris G Skidmore 415 W. Main Street Suite 2 Frankfort, KENTUCKY 40601 \*Honorable David J. Barberie
Managing Attorney
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KENTUCKY 40507

\*Janice Theriot Zielke Law Firm PLLC 1250 Meidinger Tower 462 South Fourth Avenue Louisville, KENTUCKY 40202

\*Barry Alan Naum Spilman Thomas & Battle, PLLC 1100 Brent Creek Blvd., Suite 101 Mechanicsburg, PENNSYLVANIA 17050 \*Don C A Parker Spilman Thomas & Battle, PLLC 1100 Brent Creek Blvd., Suite 101 Mechanicsburg, PENNSYLVANIA 17050 \*Honorable Kurt J Boehm Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202

\*Casey Roberts Sierra Club 1536 Wynkoop St., Suite 312 Denver, COLORADO 80202 \*Gregorgy T Dutton Goldberg Simpson LLC 9301 Dayflower Street Louisville, KENTUCKY 40059 \*Honorable Kendrick R Riggs Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KENTUCKY 40202-2828

\*Carrie M Harris Spilman Thomas & Battle, PLLC 1100 Brent Creek Blvd., Suite 101 Mechanicsburg, PENNSYLVANIA 17050

\*Gardner F Gillespie Sheppard Mullin Richter & Hampton LLP 1300 I Street NW 11th Floor East Washington, DISTRICT OF COLUMBIA 20005 \*Kent Chandler Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204

\*Joe F Childers
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, KENTUCKY 40507

\*James W Gardner Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KENTUCKY 40507 \*Lawrence W Cook Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204 \*Laura Milam Ross Kentucky League of Cities 101 East Vine Street Suite 800 Lexington, KENTUCKY 40507 \*Robert Conroy LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

\*Laurence J Zielke Zielke Law Firm PLLC 1250 Meidinger Tower 462 South Fourth Avenue Louisville, KENTUCKY 40202

\*Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

\*Matthew Miller Sierra Club 50 F Street, NW, Eighth Floor Washington, DISTRICT OF COLUMBIA 20001 \*M. Todd Osterloh Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KENTUCKY 40507

\*Honorable Michael L Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OHIO 45202

\*Paul Werner Sheppard Mullin Richter & Hampton LLP 1300 I Street NW 11th Floor East Washington, DISTRICT OF COLUMBIA 20005

\*Rebecca W Goodman Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue Suite 20 Frankfort, KENTUCKY 40601-8204

\*Honorable Robert C Moore Attorney At Law Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KENTUCKY 40602-0634