

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	
LOUISVILLE GAS AND ELECTRIC)	CASE NO.
COMPANY FOR AN ORDER APPROVING)	2018-00304
THE ESTABLISHMENT OF REGULATORY)	
LIABILITIES AND REGULATORY ASSETS)	

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

Kentucky Utilities Company (KU) and Louisville Gas and Electric Company (LG&E) (jointly, KU/LG&E), pursuant to 807 KAR 5:001, are to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before November 12, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be approximately bookmarked. 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 that 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 filing 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, paragraphs 17 and 18. Provide the number of customers without power, downed wires, and damaged poles because of the July 2018 Storm, by utility.

2. Refer to KU/LG&E's response to Commission Staff's First Request for Information (Response to Staff's First Request), Item 2(b). Provide a list of the number of damaged poles by size, and by utility.

3. Refer to the application, paragraph 18, regarding the statement that the July 2018 Storm ranks among the top five most damaging storms to hit the KU/LG&E system as a whole. Refer also to Response to Staff's First Request, Item 3.

a. State whether KU/LG&E defines “damaging” in this sentence based on repair cost or some other criteria.

b. State whether the 2018 Storm “ranks among the top five most damaging storms to hit” the KU system, in which damaging is measured by repair cost, using constant 2018 dollars.

c. State whether the 2018 Storm “ranks among the top five most damaging storms to hit” the LG&E system, in which damaging is measured by repair cost, using constant 2018 dollars.

d. To the extent not already provided, provide further details on storms that caused as much or more damage for KU (based on repair cost, using constant 2018 dollars) than the July 2018 Storm. Include, but not limited to, a description of each storm, the number of customers impacted, the cost of each of those storm damages, the operations and maintenance (O&M) expense budgets for storm damage that were then embedded in base rates for KU, whether KU sought authority to defer those expenses, the docket number of the case, and whether the Commission approved such request.

e. To the extent not already provided, provide further details on storms that caused as much or more damage for LG&E (based on incremental repair cost, using constant 2018 dollars) than the July 2018 Storm. Include, but not limited to, a description of each storm, the number of customers impacted, the cost of each of those storm damages, the O&M expense budgets for storm damage that were then embedded in base rates for LG&E, whether LG&E sought authority to defer those expenses, the docket number of the case, and whether the Commission approved such request.

f. For KU and LG&E separately, identify any storm that caused less damage than the July 2018 Storm for which KU/LG&E sought authority to defer those expenses. For such cases, identify the docket number and whether the Commission approved the request.

g. As previously requested, for the “Derecho” event identified in KU/LG&E’s response, provide the O&M expense budgets for storm damage that embedded in base rates for KU and LG&E during that period.

4. Refer to the Response to Staff’s First Request, Item 6.

a. Provide the same information requested as to Item 6 for calendar years 2008–2013.

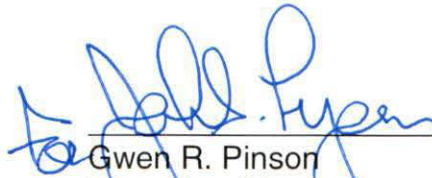
b. For each major storm identified in the information provided, state whether KU or LG&E sought authority to defer those expenses, the docket number of the case, and whether the Commission approved such request.

5. Refer to the Response to Commission Staff’s First Request, Item 8(a).

a. Explain why the second quarter of 2018 is a reasonable period to base the normal operations adjustment.

b. For the second quarter of 2018, provide a schedule comparing the O&M expense budgeted for storm damage and the actual amounts incurred, separated by utility.

6. Refer to the Response to Staff’s First Request, Item 8(b). For each miscellaneous cost identified, provide a description and reason for incurring said cost.



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DATED OCT 26 2018

cc: Parties of Record

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