

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR AN)	CASE NO.
ORDER APPROVING THE ESTABLISHMENT OF)	2019-00017
A REGULATORY ASSET)	

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 an electronic version of its responses of the following information, with a copy to all parties of record. The information requested herein is due no later than February 25, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Responses required to be submitted in electronic format shall be in portable document format (PDF), shall be searchable and shall be appropriately 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.

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. When filing a paper containing personal information, 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, paragraph 9.
 - a. Provide the capital costs incurred by LG&E as a result of restoration efforts due to the November 2018 Ice Storm, as defined in the application.
 - b. Provide a list of the number of damaged poles by size.
 - c. Provide a breakdown of the 1,000 employees and contractors, including a list of contractors and mutual assistance crews that were involved in the restoration process.
2. Refer to the application, paragraph 13. LG&E states that the operations and maintenance (O&M) expense embedded in its base rates for storm damage is \$5.4 million. For the calendar years 2014 through 2017 and available months of 2018, provide

a schedule that compares the O&M expense budgeted for storm damage and the actual amounts incurred. Identify in each calendar year any major storms and the cost incurred by LG&E to repair the damage for each major storm.

3. Refer to the application, paragraph 19. Explain whether LG&E has included the amortization of the requested November 2018 Ice Storm regulatory asset in its pending rate case, Case No. 2018-00295.¹

4. Refer to the application, Exhibit 1.

a. For “Estimated Amount Considered Normal Operations,” provide the period on which the amounts are based and a detailed description of how these costs were determined and calculated. Explain why the chosen period is a reasonable period to base the normal operations adjustment.

b. Confirm that LG&E included no costs for the cost category “Materials” under “Normal Operations.” If confirmed, explain the basis for this exclusion.

c. Provide a breakout of the cost category “Materials” between poles, wires, transformers, etc.

d. Provide a detailed breakdown of miscellaneous costs, showing the actual amounts and estimated amounts separately. For each miscellaneous cost identified, provide a description and reason for incurring said cost


e. Provide a detailed breakdown of any contingency costs, showing the actual amounts and estimated amounts separately.

f. State when LG&E expects to know the amount of the final actual costs.

¹ Case No. 2018-00295, *Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Rates*.

g. Provide an updated Exhibit 1 based on the most recent information available for estimated and actual costs. Show the date on which the updated costs are based.

5. State whether any transmission lines were damaged as a result of the November 2018 Ice Storm. If there were transmission line restoration costs due to the November 2018 Ice Storm, provide the amount of those costs and whether they are included as part of the proposed regulatory asset.



Gwen R. Pinson
Executive Director
Public Service Commission
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DATED **FEB 08 2019**

cc: Parties of Record

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