

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES )  
COMPANY FOR AN ADJUSTMENT OF ITS )  
ELECTRIC RATES )

CASE NO.  
2014-00371

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT'S SUPPLEMENTAL REQUEST  
FOR INFORMATION TO THE KENTUCKY UTILITIES COMPANY**

Comes now the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel and pursuant to the Public Service Commission's Scheduling Order of December 12, 2014, and submits its Supplemental Request for Information to the Kentucky Utilities Company ("KU") to be answered in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

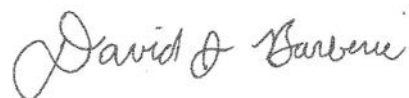
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

WHEREFORE, the Lexington-Fayette Urban County Government submits this First Request for Information.

Respectfully submitted,

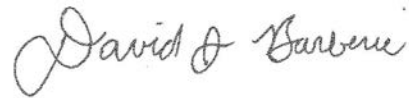


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**FILING NOTICE AND CERTIFICATE**

I hereby certify that this Request for Information is a true and accurate copy of the document(s) to be filed in paper medium with the Public Service Commission (which include a cover letter serving as the required Read1st document) within two (2) business days; that the electronic submission of these documents to the Commission was performed on February 5, 2015; and that there are currently no parties that have been excused from participation by electronic service.



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ATTORNEY FOR LEXINGTON-FAYETTE  
URBAN COUNTY GOVERNMENT

## **REQUEST FOR INFORMATION**

1. Please refer to LFUCG's Request for Information No. 4. Please provide the amount of franchise fees collected from Fayette County customers and remitted to LFUCG for each of the last 3 years as well as the base year period.

2. Please refer to LFUCG's Request for Information No. 28. In clarification, LFUCG seeks to understand whether KU allows any such use of street lights for non-lighting purposes. By way of example, but not limitation, does KU allow any third party to attach any equipment to, or otherwise utilize the street lights for which LFUCG pays tariffs. More specifically, does KU allow, in any way, the non-governmental utilization of public street lights in Fayette County?

(a) If so, please provide a detailed explanation of each different type of such utilization that occurs in Fayette County, the extent of each type of utilization, the names of any parties that have agreements with KU regarding such usage in Fayette County, the amount and type of compensation or consideration (monetary or otherwise) that KU typically receives for such usage, copies of any pertinent agreements for such usage, and the total amount of compensation that KU receives for such activities.

3. Please refer to your response to LFUCG Request for Information No. 32. Are the following statements accurate? If not, please explain why not.

(a) The suggested rate increase of approximately 9.6% is not necessarily the rate increase which will be experienced by a particular customer.

(b) The actual proposed rate increase for a particular customer is dependent upon their usage as the various demand factor(s) may impact their actual rate increase.

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