

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

In the Matter of:

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

**DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to the Kentucky Industrial Utility Customers, Inc. (“KIUC”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 13, 2016.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, KIUC, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

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

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If KIUC objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground 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.

8. In the event any document requested has been destroyed or transferred beyond the control of KIUC, its counsel, or its witnesses, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

KU:

Mr. Baron

1. Provide a copy of all notes and workpapers prepared by Mr. Baron in connection with this proceeding. If Mr. Baron prepared any Excel spreadsheets or other computer generated documents, please provide an electronic version of those documents.

2. On page 35, lines 6-7, of his testimony, Mr. Baron states that “manufacturing jobs tend to have high job multipliers.” Please provide the actual or approximate number of employees at each of the following manufacturing plants served by KU or LG&E and that are members of the KIUC, as listed on page 3 of Mr. Baron’s testimony:
 - a. AAK, USA K2 LLC
 - b. Air Liquid U.S. LP
 - c. Alliance Coal LLC
 - d. Carbide Industries LLC
 - e. Cemex
 - f. Corning Incorporated
 - g. Clopay Plastic Products Co. Inc.
 - h. Dow Corning Corporation
 - i. Ford Motor Company
 - j. Ingevity
 - k. Lexmark International Inc.
 - l. North American Stainless
 - m. The Chemours Company
 - n. Toyota Motor Manufacturing, Kentucky Inc.

3. On page 35, lines 7-8, of Mr. Baron’s testimony, he states that, “for every one manufacturing job created or saved about two additional support-related jobs are created.” Provide all research, economic reports or other documents that Mr. Baron relied on to make this statement.

Mr. Baudino

4. Please provide copies of all electronic files used in the preparation of Mr. Baudino’s testimony exhibits with all data and formulas intact.

5. Please provide copies of all articles, publications, and other sources documents referenced in Mr. Baudino’s testimony and exhibits.

6. Reference Exhibit No._(RAB-6), page 2:

- a. Please provide a list of each firm relied on by Mr. Baudino to develop the median earnings and book value growth rates and the individual growth rate estimates for each firm.
- b. Please provide a list of each firm relied on by Mr. Baudino to develop the average dividend yield of 0.81% and the individual dividend yield for each firm.
- c. Please provide all workpapers and supporting documents for the Value Line median growth rates and dividend yields.
- d. Please indicate how many of the firms included in arriving at the median earnings and book value growth rates pay common dividends.

Dr. Goins

7. Provide a copy of all notes and workpapers prepared by Dr. Goins in connection with this proceeding. If Dr. Goins prepared any Excel spreadsheets or other computer generated documents please provide an electronic version of those documents.
8. On page 4, lines 15-17, Dr. Goins states, “Some of these CSR customers have invested millions of dollars in production processes designed to operate efficiently using nonfirm electric service.”
 - a. Please provide all studies, analysis, reports and other information created by or relied upon by Dr. Goins that specifically describes the “investment in production processes” made by CSR customers and how they were “designed” to operate with “nonfirm electric service.”
 - b. Please describe how the design or operation of these “production processes” would be impacted if they were served by firm electric service instead of nonfirm service.
 - c. Please describe the degree of nonfirm electric service (e.g, number of interruption events, duration of interruptions, frequency of interruption events) that these production processes were designed to efficiently utilize.
 - d. What is Dr. Goins’ definition of nonfirm electric service?
9. Per Dr. Goins’ recommendation on page 6, lines 13-15, is it his position that the Companies should offer a CSR Rider option regardless of the system’s need for current or the timing of the need for future capacity?
10. Referring to page 8, lines 13-16, is it Dr. Goins’ position that the Companies have no duty or responsibility to consider the load of a CSR Rider customer in non-curtable hours in planning to reliably and economically serve system load?

- a. During the course of the year, outside of the 100 hours in which the Companies can ask the CSR Rider customer to curtail its load, is a CSR Rider customer's load firm or nonfirm load?
11. On page 8, lines 16-19, Dr. Goins states that interruptible service is a "lower quality product" and that interruptible customers face "significant financial penalties if they do not interrupt load when required."
 - a. In what ways is the service that a CSR Rider customer receives from the Companies' a "lower quality product?"
 - b. Will a CSR Rider customer still receive electric power from the Companies should the CSR Rider customer fail to curtail load when requested?
 - c. What is Dr. Goins' definition of a "significant" financial penalty?
12. Referring to page 10, lines 13-15, outside of the hours of potential curtailment for a CSR Rider customer, should the Companies consider a CSR Rider customer's load in its capacity planning?
 - a. Do the Companies have an obligation to serve a CSR Rider customer's load outside of the hours of potential curtailment?
 - b. Do the Companies have an obligation to serve a CSR Rider customer's load should it fail to curtail load when requested?
13. Referring to page 11, lines 5-6, what is the Companies' "cost of providing nonfirm service"? Please provide all analysis, workpapers, reports, etc. to support your response.
14. Referring to page 11, lines 9-10, what is Dr. Goins' definition of "long-run" and "short-run"?
15. Referring to page 11, lines 16-20, please provide any reports, analysis, or other data that describe the "long-term contractual and/or operational commitment" that CSR Rider customers have made since the Companies' last rate case based on the existing CSR Rider credit.
16. Referring to page 14, lines 7-10, please provide all reports, tariffs, or other documents used to determine the range of interruptible rate options.
17. Referring to page 15, lines 8-10, please provide all analysis, workpapers, reports, or other documents prepared by or reviewed by Dr. Goins that assess the potential customer impacts of the Companies' CSR Rider proposals.

18. Given that the Companies are filing a forward test year case, should they consider the most current load forecast information in developing their rates, including the CSR Rider?
19. Referring to page 17, lines 15-24:
 - a. What is Dr. Goins' definition of off-peak?
 - b. Please provide any analysis, reports, workpapers, etc. that support Dr. Goins' statement that "baseload capacity is typically used to serve off-peak loads."
 - c. What is Dr. Goins' definition of "baseload capacity?"
 - d. Please provide any reports, analysis, workpapers, etc. that Dr. Goins relied upon to conclude that "off-peak demands do not drive a utility's need for capacity."
20. Referring to page 19, lines 9-16 and lines 18-24, please provide all workpapers, analysis, reports prepared by Dr. Goins related to the bill impact assessment for KIUC's CSR customers.
 - a. Did these analyses include any review of the financial viability, national or international competitiveness implications, or job impact of the proposed CSR Rider changes on these customers? If so, please provide all reports, studies, analysis, workpaper, etc.
 - b. Please provide all reports, studies, analyses, and workpapers, supporting Dr. Goins' statement regarding the "potential harmful effects of its proposals on business development and job retention in Kentucky."
21. Referring to page 21, lines 15-17, is there a minimum number of years that CSR Rider credits should be in effect before they can be changed? Please provide all analysis, reports, studies, workpapers, etc. that support this conclusion.
22. Referring to page 25, lines 13-15, please provide all studies, analyses, reports, workpapers, etc. that show the impact of the Companies' proposed CSR Rider changes on the competitiveness of CSR customers and the attractiveness of Kentucky's business environment.

Mr. Kollen

23. Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Kollen in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. Include all notes, workpapers, and data used to make your recommend revenue requirement adjustments. If any Excel spreadsheets or other computer generated documents were prepared by or on

behalf of Mr. Kollen, please provide an electronic version of those documents with all formulas intact.

24. Refer to page 20, line 9 of Mr. Kollen's testimony regarding the cycled approach to vegetation management. Please describe and produce all empirical support, objective evidence, studies, or analyses serving as the basis for Mr. Kollen's assertion that "the proposed change in approach does not inherently require additional maintenance expense."
25. Is Mr. Kollen a Certified Depreciation Professional?
26. Please provide a list of each course, training or seminar Mr. Kollen has attended related specifically to utility depreciation.
27. Has Mr. Kollen ever recommended depreciation rates or dismantlement accruals that include terminal net salvage estimates? If the response is yes, please provide the docket number of each case in which Mr. Kollen recommended depreciation rates or dismantlement accruals that included terminal net salvage estimates.

LG&E:

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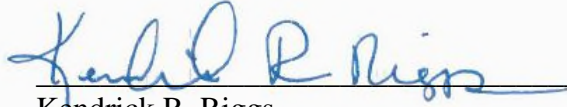
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Dated: March 17, 2017

Respectfully submitted,

A handwritten signature in blue ink, reading "Kendrick R. Riggs", is written over a horizontal line.


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*Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company*

CERTIFICATE OF COMPLIANCE

This is to certify that Kentucky Utilities Company's and Louisville Gas and Electric Company's March 17, 2017 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 17, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six copies, in paper medium of the Data Requests, are being mailed by U.S. First Class Mail, postage prepaid, to the Commission on March 17, 2017.



*Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company*