1 ©
Mr. Jeff DeRouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

MAY 102010
PUBLIC SERVICE
CONANISSION

## RE: Application of Kentucky Utilities Company for an Adjustment of Its Base Rates - Case No. 2009-00548

Dear Mr. DeRouen:

Please find enclosed and accept for filing the original and ten (10) copies of the Response of Kentucky Utilities Company to the Fourth Data Request of the Commission Staff dated April 30, 2010, in the above-referenced matter.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,


Lonnie E. Bellar
cc: Parties of Record

## VERIFICATION

## COMMONWEALTH OF KENTUCKY )

## COUNTY OF JEFFERSON )

The undersigned, S. Bradford Rives, being duly sworn, deposes and says that he is Chief Financial Officer for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

S. Bradford Rives

Subscribed and sworn to before me, a Notary Public in and before said County and State, this $7^{4 h}$ day of May_ 2010.


My Commission Expires:


## VERIFICATION

COMMONWEALTH OF KENTUCKY )


COUNTY OF JEFFERSON

The undersigned, Lonnie E. Bellar, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


Subscribed and sworn to before me, a Notary Public in and before said County and State, this $6^{\text {th }}$ day of May

> Notary Public


## VERIFICATION

## COMMONWEALTH OF KENTUCKY ) COUNTY OF JEFFERSON )

The undersigned, Valerie L. Scott, being duly sworn, deposes and says that she is Controller for Kentucky Utilities Company and an employee of E.ON U.S. Services, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.


Subscribed and sworn to before me, a Notary Public in and before said County and State, this rath day of 2009.


My Commission Expires:


## VERIFICATION

## COMMONWEALTH OF KENTUCKY ) ) $\mathrm{SS}:$ COUNTY OF JEFFERSON )

The undersigned, Robert M. Conroy, being duly sworn, deposes and says that he is Director - Rates for E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


Subscribed and sworn to before me, a Notary Public in and before said County and State, this $7^{\text {th }}$ day of May


My Commission Expires:

VERIFICATION
COMMONWEALTH OF KENTUCKY )
COUNTY ) SS:
COUNTY OF JEFFERSON
)

The undersigned, Sidney L. "Butch" Cockerill, being duly sworn, deposes and says that he is Director - Revenue Collections for E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


Subscribed and sworn to before me, a Notary Public in and before said County and State, this $\qquad$ day of $\qquad$ 2010.


My Commission Expires:


## VERIFICATION

## COMMONWEALTH OF KENTUCKY

## )

) SS:
COUNTY OF JEFFERSON
)

The undersigned, Ronald L. Miller, being duly sworn, deposes and says that he is Director - Corporate Tax for E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


Subscribed and sworn to before me, a Notary Public in and before said County and State, this $7^{\text {th }}$ day of_May_ 2010. $\frac{(1 \tan \operatorname{ta})}{\text { Notary Public }}$ Hayes (SEAL)

My Commission Expires:


## VERIFICATION

## COMMONWEALTH OF KENTUCKY ) ) $\mathbf{S S}:$ COUNTY OF JEFFERSON )

The undersigned, Shannon L. Charnas, being duly sworn, deposes and says that she is Director - Utility Accounting and Reporting for E.ON U.S. Services, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.


Subscribed and sworn to before me, a Notary Public in and before said County and State, this


My Commission Expires:


## COMMONWEALTH OF KENTUCKY <br> BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

| APPLICATION OF KENTUCKY UTILITIES | ( | CASE NO. |
| :--- | :--- | :--- |
| COMPANY FOR AN ADJUSTMENT OF | ) | $2009-00548$ |
| ITS BASE RATES | ) |  |

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO THE
FOURTH DATA REQUEST OF COMMISSION STAFF DATED APRIL 30, 2010

## KENTUCKY UTILITIES COMPANY

CASE NO. 2009-00548

## Response to Fourth Data Request of Commission Staff Dated April 30, 2010

Question No. 1
Responding Witness: Valerie L. Scott
Q-1. Refer to the letter submitted by KU on April 19, 2010, regarding the revisions to Exhibit 1, Reference Schedule 1.16.
a. Explain why the amount of the 2009 Winter Storm Restoration regulatory asset decreased from $\$ 3,464,137$ to $\$ 3,461,562$.
b. Explain whether the differences in the adjustments for labor and labor-related costs in the letter of $\$ 754,418$ from the amounts of $\$ 793,717$ in Rives Exhibit 1, Reference Schedule 1.16 , are or are not related to the change in the regulatory asset amount.
c. Provide an updated version of Exhibit 1, Reference Schedule 1.16, which shows the derivation of the amounts contained in the letter.

A-1. a. The amount of total labor actually charged to the regulatory asset was $\$ 3,461,562$. The $\$ 3,464,137$ used in the originally submitted Rives Exhibit 1, Reference Schedule 1.16 was calculated from information compiled in preparing responses in the Commission's Case No. 2009-00174, Application of Kentucky Utilities Company for an Order Approving the Establishment of a Regulatory Asset. In preparing responses to requests for information in this case, KU referred to the actual journal entries used to record the 2009 Winter Storm Restoration regulatory asset and determined that subsequent adjustments had been made to the labor charged to the storm by various employees to reflect changes in actual costs.
b. The difference between the $\$ 793,717$ adjustment to wages on the originally submitted Rives Exhibit 1, Reference Schedule 1.16, and the \$763,317 adjustment to wages on the updated Rives Exhibit 1, Reference Schedule 1.16 included in the attachment to the response to Question No. 2, is related to adjusting the labor charged to the regulatory asset to the actual amount recorded, as discussed in the response to (a) above. The $\$ 754,418$ adjustment contained in the letter dated April 19, 2010, is the total labor adjustment after the related adjustments to payroll taxes, 401(k) costs, and the jurisdictional factor. See attached for a summary of the changes for each of these amounts.
c. See Rives Exhibit 1, Reference Schedule 1.16 included in the attachment to the response to Question No. 2.

## KENTUCKY UTILITIES COMPANY

## Summary of Revised Adjustment to Reflect Increases in Labor and Labor-Related Costs As Applied to the Twelve Months Ended October 31, 2009

|  | As Adjusted |  | As Filed |  | Difference |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 Wages (Page 2) | \$ | 763,317 | \$ | 793,717 | \$ | $(30,400)$ |
| 2 Payroll Taxes (Page 3) |  | 54,229 |  | 56,389 |  | $(2,160)$ |
| 3 401(k) (Page 4) |  | 28,243 |  | 29,368 |  | $(1,125)$ |
| 4 Total |  | 845,789 |  | 879,474 |  | $(33,685)$ |
| 5 Kentucky Jurisdiction (Reference Schedule Allocators) |  | 89.197\% |  | 89.197\% |  | 89.197\% |
| 6 Kentucky Jurisdictional Adjustment | \$ | 754,418 | \$ | 784,464 | \$ | $(30,046)$ |

# KENTUCKY UTILITIES COMPANY 

CASE NO. 2009-00548

# Response to Fourth Data Request of Commission Staff Dated April 30, 2010 

Question No. 2

Responding Witness: S. Bradford Rives, Lonnie E. Bellar, Valerie L. Scott, Shannon L. Charnas, Robert M. Conroy, Ronald L. Miller

Q-2. In addition to the revisions presented in its April 19, 2010 letter, KU previously noted errors in the exhibits included in its application in various responses to data requests from Commission Staff and intervenors. Provide an updated version of all affected exhibits and schedules to the Rives Testimony reflecting the impact of the revisions noted in the letter and the revisions noted previously in KU's responses to data requests.

A-2. The summary provided below identifies the revisions and updates previously identified in various responses to data requests. The overall rate increase impact of these revisions is a decrease of $\$ 2,551,634$ to KU's Overall Revenue Deficiency as shown on the attached Revised Exhibit 8.

## Summary

The following revised exhibits are attached:

- Revised Exhibit 1, Adjustments to Operating Revenues, Operating Expenses and Net Operating Income: Corrected for revisions to Reference Schedules 1.03, 1.10, $1.13,1.14,1.16,1.17,1.21,1.31,1.34,1.42,1.45$, and new Reference Schedule 1.48 .
- Revised Exhibit 1, Reference Schedule 1.03, To Adjust Mismatch in Fuel Cost Recovery: Correction of over/under recovery calculation contained on Page 5 of 6 in the August 2009 expense month FAC filing. See response to KPSC 2-106.
- Revised Exhibit 1, Reference Schedule 1.10, To Eliminate DSM Revenue and Expenses: Correction to DSM expenses for related burden expenses not initially included. See response to KPSC 2-32.
- Revised Exhibit 1, Reference Schedule 1.13, To Adjust for Customer Billing Corrections and Rate Switching: Correction to bill corrections for customer account overbilling that occurred in the test period. See April 19, 2010 letter.
- Revised Exhibit 1, Reference Schedule 1.14, Adjustment to Revenues for Late Payment Charge: Update to late payment charges to reflect actual amounts. See response to KPSC 2-37.
- Revised Exhibit 1, Reference Schedule 1.16, Adjustment to Reflect Increases in Labor and Labor-Related Costs: Correction of labor costs related to 2009 Winter Storm regulatory asset to reflect the final amounts. See April 19, 2010 letter and response to Question No. 1.
- Revised Exhibit 1, Reference Schedule 1.17, To Adjust for Pension, PostRetirement, and Post-Employment Costs: Update for 2010 Mercer Study and correction of expenses related to DSM burden amounts. See response to KPSC 240 and KPSC 3-16.
- Revised Exhibit 1, Reference Schedule 1.21, Adjustment to Reflect Normalized Storm Damage Expense: Correction of storm damage expenses in 2008 and 2009 as filed with the direct testimony of Valerie L. Scott, Scott Exhibit 1.
- Revised Exhibit 1, Reference Schedule 1.31, Adjustment to Reflect Amortization of Rate Case Expenses: Revised estimate of newspaper advertising expense. See response to KPSC 1-55.
- Revised Exhibit 1, Reference Schedule 1.34, Adjustment to Reflect Expiration of OMU Contract: Correction of OMU demand charges related to credit for SO 2 allowances owed to KU by OMU. See April 19, 2010 letter.
- Revised Exhibit 1, Reference Schedule 1.42, Federal and State Income Taxes Corresponding to Annualization and Adjustment of Year-end Interest Expense: Corrected for revisions to Rives Exhibit 2.
- Revised Exhibit 1, Reference Schedule 1.45, Adjustment for Tax Basis Depreciation Reduction: Correction for error in book depreciation lives used to amortize the Advanced Coal Investment Tax Credit. See response to KPSC 2-47.
- Revised Exhibit 1, Reference Schedule 1.48, Adjustment to Remove Charges Incorrectly Booked Above the Line: New proposed adjustment to remove charges booked above the line that should have been below the line. See response to AG 1-110.
- Revised Exhibit 2, Capitalization at October 31, 2009: Correction of Trimble County joint use assets transfer to reflect the amount of investment tax credit transferred from LG\&E. Update to Annual Cost Rate as of March 31, 2010. See April 19, 2010 letter.


## Response to Question No. 2 <br> Page 3 of 3 <br> Rives/Bellar/Scott/Charnas/Conroy/Miller

- Revised Exhibit 4, Pro Forma Kentucky Jurisdictional Rate Base: Correction of Trimble County joint use assets transfer investment tax credit to correspond with the amount reflected on Exhibit 2.
- Revised Exhibit 7, Rates of Return - Actual and Requested Pro-Formed for the Rate Increase: Revised to reflect revisions to Exhibit 1, Exhibit 4, and Exhibit 8.
- Revised Exhibit 8, Calculation of Overall Revenue Deficiency/(Sufficiency) at October 31, 2009: Revised to reflect revisions to Exhibit 1 and Exhibit 2.
- Revised Exhibit 9, Kentucky Jurisdictional Rate of Return on Common Equity: Revised to reflect revisions to Exhibit 1 and Exhibit 2.
Revised Exhibit 1


[^0] KENTUCKY UTILITIES

| Adjustments to Operating Revenues, Operating Expenses and Net Operating Income For the Twelve Months Ended October 31, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | Reference Schedule <br> (1) | Operating Revenues <br> (2) | Operating <br> Expenses <br> (3) | Net Operating Income <br> (4) |
| 18. Adjustment to reflect annualized depreciation expenses | 1.15 | - | 19,212,820 | (19,212,820) |
| 19. REVISED-Adjustment to reflect increases in labor and labor related costs | 1.16 | - | 754,418 | $(754,418)$ |
| 20. REVISED-Adjustment for pension, post retirement, and post employment costs | 1.17 | - | (664,092) | 664,092 |
| 21. Adjustment to reflect the increase in property insurance expense | 1.18 | - | 373,107 | $(373,107)$ |
| 22. Adjustment to reflect new pollution liability insurance expense | 1.19 | - | 574,164 | $(574,164)$ |
| 23. Adjustment for hazard tree program | 1.20 | - | 3,791,496 | $(3,791,496)$ |
| 24. REVISED-Adjustment to reflect normalized storm damage expense | 1.21 | - | (1,076,306) | 1,076,306 |
| 25. Adjustment for injuries and damages FERC account 925 | 1.22 | - | 200,710 | $(200,710)$ |
| 26. Adjustment to eliminate advertising expenses pursuant to Commission |  |  |  |  |
| Rule 807 KAR 5:016 | 1.23 | - | $(799,431)$ | 799,431 |
| 27. Adjustment for expenses related to retired manframe | 1.24 | - | $(843,623)$ | 843,623 |
| 28. Adjustment for MISO Exit Fee regulatory asset | 1.25 | - | $(83,909)$ | 83,909 |
| 29. Adjustment for EKPC regulatory asset | 1.26 | - | 1,785,051 | (1,785,051) |
| 30. Adjustment for 2008 Wind storm regulatory asset | 1.27 | - | 2,454,286 | (2,454, 286) |
| 31. Adjustment for 2009 Winter storm regulatory asset | 1.28 | - | 11,447,352 | ( $11,447,352$ ) |
| 32. Adjustment for KCCS regulatory asset | 1.29 | - | 360,504 | (360,504) |
| 33. Adjustment for CMRG regulatory asset | 1.30 | - | 1.940 | (1,940) |
| 34. REVISED-Adjustment to reflect amortization of rate case expenses | 1.31 | - | 807,520 | (807.520) |

Revised Exhibit 1


| Adjustments to Operating Revenues, Operating Expenses and Net Operating Income For the Twelve Months Ended October 31, 2009 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | Reference Schedule (1) | Operating Revenues <br> (2) | Operating Expenses <br> (3) | Net Operating Income <br> (4) |
| 35. Adjustment for Southwest Power Pool settlement expenses | 1.32 | - | $(896,454)$ | 896,454 |
| 36. Adjustment to remove out of period adjustment for resettlements related to MISO RSG | 1.33 | - | $(510,123)$ | 510,123 |
| 37. REVISED-Adjustment to reflect expiration of OMU contract | 1.34 | - | $(14,726,846)$ | 14,726,846 |
| 38. Adjustment for reversal of OMU uncollectible account expense | 1.35 | - | 1,754,505 | (1,754,505) |
| 39 Adjustment to remove reserve margin demand purchases | 1.36 | - | (1,339,238) | 1,339,238 |
| 40. Adjustment to expenses for 2003 Ice storm amortization | 1.37 | - | (527,718) | 527,718 |
| 41. To adjust property tax expense | 1.38 | - | 1,199,643 | $(1,199,643)$ |
| 42. These adjustments left intentionally blank | 1.39-1.40 |  |  |  |
| 43. NEW-Adjustment to remove charges incorrectly booked above-the-line | 1.48 | - | (490) | 490 |
| 44. Total of above adjustments |  | $(59,342,459)$ | $(28,562,309)$ | (30,780,150) |

$$
\begin{array}{r}
\text { Revised Exhibit } 1 \\
\text { Sponsoring Witness: Rives } \\
\text { Page } 4 \text { of } 4
\end{array}
$$

| Operating Revenues | Operating Expenses <br> (3) |  | Net Operating Income (4) |
| :---: | :---: | :---: | :---: |
|  | (11,365,995) |  | 11,365.995 |
|  | $(527,961)$ |  | 527,961 |
|  | 1,126,171 |  | (1,126,171) |
|  | (457, 757 ) |  | 457,757 |
|  | 1,007,924 |  | $(1,007,924)$ |
| (59,342,459) | (38,779,927) |  | (20.562,532) |
| 1,162,318,155 | 991,760,542 | \$ | 170,557,613 |

$\pm$


|  | $\stackrel{\circ}{\infty}$ | \% |
| :---: | :---: | :---: |














[^1]
## 

KEnTUCKY utilities

| Per Books 10-31-09 <br> (1) $\qquad$ | Capital Structure (2) | Trimble County Jont Use Assets Transfer (Net Plant) $\qquad$ | Revised Trimble County Joint Use Assets Transfer (Col 3) with Annual Cost Rate as of March 31, 2010 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Timble County Joint Use Assets Transfer (ITC) (4) | Undistributed Subsidiary Earnungs (5) | Investment in EEI $\{$ Coi $2 \times$ Cof GLine 1\} (6) |
| \$ 19,665,954 | 0.55\% | 266,095 | (16,104) | \$ - | (7,127) |
| 1,631,779,405 | 45.52\% | 22,022,972 | (1,332,807) | - | (589,848) |
| 1,933,128,508 | 53.93\% | 26,091,802 | (1,579,048) | (6,207.858) | (698,825) |
| \$ 3,584,573,867 | 100.00\% | 48,380,869 | (2,927,959) | (6,207,858) | (1,295,800) |

## KENTUCKY UTILITIES

## Pro Forma Kentucky Jurisdictional Rate Base

## At October 31, 2009


(a) Exhibit 3, Column 2
(b) Supporting Schedule-Exhibit 4, Column 5

## KENTUCKY UTILITIES

## Pro Forma Adjustments to Kentucky Jurisdictional Rate Base

At October 31, 2009

(a) Adjustment to remove Environmental Compliance Plans (Exhibit 2 Col 13)
(b) Adjustment to reflect Trimble County joint use assets transfer (Exhibit $2 \mathrm{Col} 3 \times$ Exhibit 2 Col 10 )
(c) Adjustment to reflect Irimble County joint use assets transfer Investment Tax Credit (Exhibit 2 Col $4 \times$ Exhibit 2 Col 10)
(d) Adjustment to reflect annualized depreciation expenses (Reference Schedule 115)
(e) Using the $1 / 8$ th formula and change in Operation and Maintenance Expenses adjusted for FAC roll-in, Purchase Power and ECR expense adjustments ((Exhibit I Col 3, Line 44-Line 8-Line 9 -Line 18 - Line 37 - Line 39 - Line 41 - Ref Sch 104 Line 3)/8)

## KENTUCKY UTILITIES

## Rates of Return - Actual and Requested Pro-Formed for the Rate Increase <br> For the Twelve Months Ended October 31, 2009

Total
(1)

1. Kentucky Jurisdictional Net Original Cost Rate Base - Exhibit 3
2. Kentucky Jurisdictional Pro Forma Rate Base - Exhibit 4
3. Kentucky Jurisdictional Reproduction Cost Rate Base - Exhibit 5
4. Kentucky Jurisdictional Net Operating Income - Actual - Exhibit 1
5. Rate of Return (Actual):
6. On Kentucky Jurisdictional Net Original Cost Rate Base 6.03\%
7. On Kentucky Jurisdictional Pro Forma Rate Base $\quad 6.19 \%$
8. On Kentucky Jurisdictional Reproduction Cost Rate Base 3.31\%
9. Kentucky Jurisdictional Adjusted Net Operating Income - Exhibit 1
10. Revenue Increase Applied for - Exhibit 8
11. Income Taxes - Exhibit 1, Reference Schedule 1.41
\$ 170,557,613
\$ 3,169,724,944
$\$ 3,085,103,561$
$\$ 5,768,178,028$
\$ 191,120,145
12. Adjusted Kentucky Jurisdictional Net Operating Income Pro-formed for Rate Increase ..... \$ 254,277,539
13. Rate of Return (Pro-forma):
14. On Kentucky Jurisdictional Net Original Cost Rate Base ..... 8.02\%
15. On Kentucky Jurisdictional Pro Forma Rate Base ..... 8.24\%
16. On Kentucky Jurisdictional Reproduction Cost Rate Base ..... 4.41\%

## KENTUCKY UTILITIES

Calculation of Overall Revenue Deficiency/(Sufficiency) at October 31, 2009

1 Adjusted Kentucky Jurisdictional Capitalization (Exhibit 2, Col 14)

2 Total Cost of Capital (Exhibit 2, Col 17)

3 Net Operating Income Found Reasonable (Line $1 \times$ Line 2)
4. Pro-forma Net Operating Income
5. Net Operating Income Deficiency/(Sufficiency)
6. Gross Up Revenue Factor - Exhibit 1, Reference Schedule 1.47
7. Overall Revenue Deficiency/(Sufficiency)

|  | ORIGINAL <br> (1) |  | REVISED <br> (2) | DIFFERENCE <br> (3) |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | (2)-(1) |  |
| \$ | 3,054,543,620 | \$ | 3,051,991,904 | \$ | (2,551,716) |
|  | 8.32\% |  | 8.32\% |  | 832\% |
| \$ | 254,138,029 | \$ | 253,925,726 | \$ | $(212,303)$ |
|  | 169,167,271 |  | 170,557,613 |  | 1,390,342 |
| S | 84,970,758 | \$ | 83,368,113 | \$ | $(1,602,645)$ |
|  | 062808570 |  | 062808570 |  | 062808570 |
| \$ | 135,285,293 | $\$$ | 132,733,659 | \$ | $(2,551,634)$ |

## KENTUCKY UTILITIES

## Kentucky Jurisdictional Rate of Return on Common Equity

For the Twelve Months Ended October 31, 2009

|  | Adjusted Kentucky Jurisdictional Capitalization (Exhibit 2 Col 14 ) | Percent of Total (2) | Annual <br> Cost <br> Rate <br> (Exhibit 2 Col 16) <br> (3) | Weighted Cost of Capital $(\mathrm{Col} 2 \times \operatorname{Col} 3)$ (4) |
| :---: | :---: | :---: | :---: | :---: |
| 1. Short Term Debt | \$16,772,832 | 0.55\% | 0.21\% | 0.00\% |
| 2. Long Term Debt | \$1,391,716,894 | 45.60\% | 4.68\% | 2.13\% |
| 3. Common Equity | \$1,643,502,178 | 53.85\% | 6.43\% (a) | 3.46\% (b) |
| 4. Total Capitalization | \$3,051,991,904 | 100.00\% |  | 5.59\% |
| 5. Pro-forma Net Opera | come |  |  | \$170,557,613 (c) |
| 6. Net Operating Incom | al Capitalization |  |  | $5.59 \% \quad$ (d) |

Notes: (a) - Column 4, Line 3 / Column 2, Line 3
(b) - Column 4, Line 4 - Line 1 - Line 2
(c) - Exhibit 1, Line 51, Column 4
(d) - Column 4, Line 5 divided by Column 1, Line 4

## KENTUCKY UTILLTTIES

## Revised <br> To Adjust Mismatch in Fuel Cost Recovery <br> For the Twelve Months Ended October 31, 2009

| Expense <br> Month |  | Revenue <br> Form A <br> Page 5 of 6 <br> Line 3 |  | Expense <br> Form A* <br> Page 5 of 6 <br> Line 8 |
| :---: | :---: | :---: | :---: | :---: |
| Nov-08 |  | 7,161,750 |  | 3,457,004 |
| Dec-08 |  | 2,617,813 |  | 6,620,436 |
| Jan-09 |  | 4,080,402 |  | 5,529,020 |
| Feb-09 |  | 6,594,389 |  | 8,560,589 |
| Mar-09 |  | 4,237,573 |  | 5,358,776 |
| Apr-09 |  | 8,186,876 |  | 2,729,326 |
| May-09 |  | 4,611,651 |  | $(1,175,992)$ |
| Jun-09 |  | 3,221,469 |  | 5,255,165 |
| Jul-09 |  | $(1,124,681)$ |  | 1,869,873 |
| Aug-09 |  | 5,348,954 |  | 3,518,904 |
| Sep-09 |  | 1,735,424 |  | 872,983 |
| Oct-09 |  | 3,094,936 |  | 285,720 |
| Total | \$ | 49,766,556 | \$ | 42,881,804 |
| Adjustment | \$ | $(49,766,556)$ | \$ | $(42,881,804)$ |

* NOTE : Expenses are recovered in the second succeeding month. For example, January 2009 would be reflected in March 2009.


## Revised Exhibit 1

Reference Schedule 1.10
Sponsoring Witness: Conroy

## KENTUCKY UTILITIES

Revised<br>To Eliminate DSM Revenues and Expenses<br>For the Twelve Months Ended October 31, 20091. DSM Revenue adjustment\$ $(12,940,085)$

2. DSM Expense adjustment ..... (7,721,275)
3. Net Adjustment ..... \$ $(5,218,810)$

Revised Exhibit 1<br>Reference Schedule 1.13<br>Sponsoring Witness: Conroy

## KENTUCKY UTILITIES

## Revised <br> To Adjust for Customer Billing Corrections and Rate Switching As Applied to the Twelve Months Ended October 31, 2009

1. Major Account Billing Corrections $(96,923)$
2. Rate switch - LP to TOD
$(172,038)$
3. Total Adjustment
\$ $(268,961)$

## Revised Exhibit 1

Reference Schedule 1.14
Sponsoring Witness: Bellar

## KENTUCKY UTILITIES

## Revised <br> Adjustment to Revenues for Late Payment Charge <br> For the Twelve Months Ended October 31, 2009

| 1. Late Payment Charge Revenues in test year (April to October 2009) | $\$$ | $4,398,330$ |
| :--- | ---: | ---: |
| 2. Late Payment Charge Revenues (November 2009 to March 2010) |  | $4,612,907$ |
| 3. Annual Amount of Late Payment Charges | $\$ \quad 9,011,237$ |  |
| 4. Total Adjustment (Line 3 - Line 1) | $\$$ | $4,612,907$ |

# Attachment to Response to KU KPSC-4 Question No. 2 

Page 15 of 25
Rives

## KENTUCKY UTILITIES

## Revised

Adjustment to Reflect Increases in Labor and Labor-Related Costs
As Applied to the Twelve Months Ended October 31, 2009

| 1 | Wages (Page 2) | 763,317 |
| :--- | :--- | ---: |
| 2 | Payroll Taxes (Page 3) | 54,229 |
| 3 | $401(k)$ (Page 4) | 28,243 |
| 4 | Total | 845,789 |
| 5 | Kentucky Jurisdiction (Ref. Sch Allocators) | $89,197 \%$ |
| 6 | Kentucky Jurisdictional Adjustment | $\mathbf{7 5 4 , 4 1 8}$ |

## KENTUCKY UTILITIES

## Revised

## Adjustment to Reflect Increases in Labor and Labor-Related Costs

As Applied to the Twelve Months Ended October 31, 2009

(a) Represents actual numbers taken from the Company's financial records for the 12 months ended October 31, 2009
(b) All labor related to the 2009 winter storm restoration regulatory asset is assumed to be overtime and premiums.

## KENTUCKY UTILITIES

Revised
Adjustments to Reflect Increases in Payroll Taxes
As Applied to the Twelve Months Ended October 31, 2009

| 1 | Operating Labor increase (Page 2 Line 27) |
| :--- | :--- |

## KENTUCKY UTILITIES

## Revised

Adjustment to Reflect Increases in Company Contribution to 401(k)
As Applied to the Twelve Months Ended October 31, 2009

|  | Direct total payroll for 12 months ended 10/31/09 before deducting storm-related labor (Page 2 Line 6 - Page 2 Line 4) | \$ | 129,805,351 |
| :---: | :---: | :---: | :---: |
| 2 | Total 401(k) Company Contribution for 12 months ended 10/31/09 |  | 4,764,961 |
| 3 | 401(k) Company Contribution as a percent of payroll (Line $2 /$ Line 1) |  | 3.7\% |
| 4 | Operating Labor increase (Page 2 Line 27) |  | 763,317 |
| 5 | 401(k) Company Contribution operating increase (Line $3 \times$ Line 4) | \$ | 28,243 |

## KENTUCKY UTILITIES

Revised
To Adjust for Pension, Post Retirement, and Post Employment

## For the Twelve Months Ended October 31, 2009

|  |  | Pension |  | Post Retirement |  | Post Employment |  | Total |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Pension, Post Retirement and Post Employment expenses in test year | \$ | 17,380,811 | \$ | 5,179,729 | \$ | 449,162 |  | 3,009,702 |
|  | Pension, Post Retirement, and Post Employment expenses annualized for 2010 Mercer Study |  | 17,047,234 |  | 4,956,879 |  | 261,066 |  | 22,265,179 |
| 3 | Total adjustment (Line 2 - Line 1) | \$ | (333,577) | \$ | $(222,850)$ | \$ | $(188,096)$ | \$ | (744,523) |
| 4 | Kentucky Jurisdiction (Ref. Sch Allocators) |  |  |  |  |  |  |  | 89 197\% |
|  | Kentucky Jurisdictional adjustment |  |  |  |  |  |  | \$ | $(664,092)$ |

Revised Exhibit 1
Reference Schedule 1.21
Sponsoring Witness: Scott

## KENTUCKY UTILITIES

## Revised

## Adjustment to Reflect Normalized Storm Damage Expense

For the Twelve Months Ended October 31, 2009

1. Storm damage provision based upon ten year average \$ 3,102,356
2. Storm damage expenses incurred during the 12 months ended October 31, 2009

4,244,616
3. Adjustment
$(1,142,260)$
4. Kentucky Jurisdiction
$94.226 \%$
5. Kentucky Jurisdictional adjustment
$\$(1,076,306)$

| Year | Expense (a) | CPI-All Urban <br> Consumers | Amount |  |
| :---: | :---: | :---: | :---: | :---: |
| 2009 | $\$$ | $4,244,616$ | (b) | 1.0000 |
| 2008 | $6,951,799$ | (b) | 0.9927 | $4,244,616$ |
| 2007 | $2,035,000$ | 1.0308 | $6,901,051$ |  |
| 2006 | $4,114,000$ | 1.0602 | $2,097,678$ |  |
| 2005 | $2,538,000$ | 1.0944 | $4,361,663$ |  |
| 2004 | $4,120,000$ | 1.1315 | $2,777,587$ |  |
| 2003 | $1,434,000$ | 1.1616 | $4,661,780$ |  |
| 2002 | $1,460,495$ | 1.1881 | $1,665,734$ |  |
| 2001 | $1,102,683$ | 1.2069 | $1,735,214$ |  |
| 2000 | $1,005,000$ | 1.2412 | $1,330,828$ |  |
| Total |  |  | $1,247,406$ |  |

(a) 2009 expense is for 12 months ended October 31, 2009.

All other years expenses are for calendar year.
(b) 2008 and 2009 expenses do not include 2008 Wind Storm and 2009 Winter Storm expenses that were recorded as regulatory assets.

# Revised Exhibit 1 <br> Reference Schedule 1.31 <br> Sponsoring Witness: Charnas 

## KENTUCKY UTILITIES

## Revised <br> Adjustment for Rate Case Amortization

For the Twelve Months Ended October 31, 2009

1. Total Estimated cost of 2009 Rate Case ..... \$ 1,962,000
2. Amortization period in years ..... 3
3. Annual amortization ..... 654,000
4. 2009 Rate Case amortization included in test year
5. Net Adjustment for 2009 Rate Case expenses ..... 654,000
6. 2008 Rate Case Annual amortization ..... 460,559
7. 2008 Rate Case Annual amortization included in test year ..... $(307,039)$
8. Net Adjustment for 2008 Rate Case expenses ..... 153,520
\$ 9. Total Adjustment (Line $5+$ Line 8) ..... \$807,520

# Revised Exhibit 1 <br> Reference Schedule 1.34 <br> Sponsoring Witness: Bellar 

## KENTUCKY UTILITIES

Revised<br>Adjustment for Expiration of OMU Contract For the Twelve Months Ended October 31, 2009

1. OMU Demand charges incurred during
the 12 months ended October 31, 2009\$ 17,048,315
2. Adjustment ..... \$ $(17,048,315)$
3. Kentucky Jurisdiction (Ref. Sch. Allocators) ..... 86.383\%
4. Kentucky Jurisdictional adjustment ..... \$ $(14,726,846)$

## Revised Exhibit 1

Reference Schedule 1.42
Sponsoring Witness: Miller

## KENTUCKY UTILITIES

## Revised

## Calculation of Current Tax Adjustment Resulting

 From "Interest Synchronization"| 1. Adjusted Jurisdictional Capitalization - Exhibit 2 | $\$$ | $3,051,991,904$ |
| :--- | ---: | ---: |
| 2. Weighted Cost of Debt - Exhibit 2 |  | $2.13 \%$ |
| 3. "Interest Synchronization" | $\$$ | $65,007,428$ |
| 4. Kentucky Jurisdictional Interest per books (excluding other interest) |  | $63,577,661$ |
| 5. "Interest Synchronization" adjustment (Line 4-3) | $\$$ | $(1,429,767)$ |
| 6. Composite Federal and State tax rate |  | $36.9264 \%$ |
| 7. Current tax adjustment from "Interest Synchronization" | $\$$ | $(527,961)$ |

# Revised Exhibit 1 <br> Reference Schedule 1.45 <br> Sponsoring Witness: Miller 

## KENTUCKY UTILITIES

## Revised <br> Adjustment for Tax Basis Depreciation Reduction For the Twelve Months Ended October 31, 2009

1. Permanent difference due to loss of depreciable tax basis ..... \$ 1,030,565
2. Kentucky Jurisdiction (Ref. Sch. Allocators) ..... 97.803\%
3. Kentucky Jurisdictional adjustment ..... \$ 1,007,924

## Revised Exhibit 1 <br> Reference Schedule 1.48

Sponsoring Witness: Charnas

## KENTUCKY UTILITIES

## Adjustment to Remove Charges Incorrectly Booked Above-the-Line For the Twelve Months Ended October 31, 2009

1. Charges incorrectly booked above-the-line ..... \$ ..... 549
2. Kentucky Jurisdiction (Ref. Sch. Allocators) ..... 89.197\%
3. Kentucky Jurisdictional amount ..... \$ ..... 490
4. Kentucky Jurisdictional adjustment ..... \$(490)

# KENTUCKY UTILITIES COMPANY 

CASE NO. 2009-00548

# Response to Fourth Data Request of Commission Staff Dated April 30, 2010 

Question No. 3

## Responding Witness: Butch Cockerill

Q-3. Refer to page 2 of 2 of the attachment to the response to Item 1 of the Attorney General's supplemental request for information, which shows the increase in the number of customers assessed late-payment penalties which began in April 2009 after the Customer Care System ("CCS") became operational.
a. Provide, as of the most recent date for which such information is available, the number of customers enrolled in the FLEX program.
b. Provide the number of customers as of March 2009 whose bill due date was modified under Extendicare, Select Due Date, or a similar program.
c. For the test year, provide a schedule which shows what the impact would have been on KU's late-payment penalty revenues if the number of days before such penalties were assessed had been 21 , rather than 15 , days from the date of billing. Describe the other financial impacts, if any, of extending the number of days from 15 to 21 before late-payment penalties would be assessed.
d. Explain whether the new CCS can accommodate a bill due date that does not change from month to month.

A-3. a. As of April 30,2010 , KU had 1,557 customers enrolled in the FLEX program.
b. Kentucky Utilities did not have a modified due date program prior to the FLEX program.
c. This request asks the Company to provide data that would result from a counterfactual scenario. Whether and how customers would respond to a latepayment charge ("LPC") assessment date of 21 days from the bill date and the associated actual LPC revenue impact on the revenue requirement of changing the LPC assessment date contained in the data request is not known or measurable with reasonable certainty. Subject to this caveat the data provided herein is purely descriptive of historical facts, not predictive of future events. The Company does not believe it is reasonable to assume that the historical payment patterns contained in the data attached hereto would continue if the LPC assessment date were extended;
rather, it would be rational economic behavior for a customer to pay on the last day on which no penalties would be assessed. Moreover, there likely are many reasons why customers do not pay their bills on time, which reasons might not be affected by a 21-day LPC assessment date.

Subject to these caveats, please see the attachment, which shows the number of customers assessed an LPC each month from April 2009 through October 2009. (The test year data for the period before CCS was implemented is not available through our CIS archive database.) The exhibit also shows the total amount of LPCs collected from those customers, as well as the amount of LPCs collected from those customers from and including day 16 through 21 following the bill date. Again, this is purely historical data, and likely does not reflect the actual LPC revenue impact of changing the LPC assessment date.

In addition to the LPC revenue impact, the Company anticipates changing the LPC assessment date would have other financial impacts and pose other operational challenges. For example, the need for short-term financing would likely increase as a result of customers' taking advantage of additional time to pay. On the operational side, assuming the Company would continue to issue disconnect notices on the 16 th day after the bill date, if the LPC assessment date were extended to 21 days, the customer would have a disconnect notice issued prior to the LPC assessment.

Another operational change would need to occur in the Company's Installment Plan process. Currently, customers need their disconnect notice to establish an installment plan. If the LPC assessment date were extended, it would be possible for an installment plan to be established for an amount less than the total amount required to avoid disconnection of service. In short, extending the LPC assessment date would likely create confusion and dissatisfaction for the Company's customers and require additional employee training.
d: It should be noted that even prior to implementation of CCS, KU's customers did not have a fixed due date each month. The attachment is an example of the 2008 meter reading and billing dates for customers in three of our twenty billing portions. As the attachment shows, customers' monthly meter reading dates and bill due dates were not fixed during 2008 (prior to CCS implementation).

Though the new CCS can accommodate a bill due date that does not change from month to month, offering such a bill due date is not recommended. Having customers' bill due dates be the same each month would create significant operational issues and increase operational expenses.

The current variance in customer bill due dates is a result of the Company's meter reading process, which allows a "window" of time for meters to be read. Presently, company processes allow five days for a meter to be read before the customer's bill is generated. The purpose of the window is to read the maximum number of meters in
the most cost-effective way and to minimize the number of estimated readings. Our current staffing levels are designed to optimize cost by maximizing the number of meters read per day. Though every effort is made to maximize the efficiencies of reading meters, various issues create the need for a meter-reading window. One key issue is the customer demographics. Even in large metropolitan areas, the number of customers in a specific geographic area may vary greatly. Our meter-reading software analyzes all these issues and creates meter-reading routes that attempt to maximize the number of meters read each day while minimizing driving time and avoiding revisiting streets and neighborhoods multiple times in the same month. In addition to customer demographic issues, a meter-reading window is necessary to offset the effects of inclement weather, holidays, unexpected employee illnesses, and injuries. If a decision were made to establish a customer due date that did not change from month to month, the company would need to greatly increase the number of meter readers it currently employs or increase the number of customer bills calculated based upon estimated consumption. In addition, if a bill were held due to a billing exception that could be resolved within one or two days to adhere to a specific due date, KU would be required to hold the bill until the next month, when the customer would likely receive two bills at the same time. Because of these operational and financial issues, using a meter-reading window is an established business practice within the utility industry.

| Kentucky Utilities Company |  |  |  |
| :---: | :---: | :---: | :---: |
| Sample Customer Bill Due Dates for the Year 2008 Customer Meter Read Portion 01, 10, 19 |  |  |  |
|  |  |  |  |
| Portion | Scheduled Read | Date to Bill | Bill Due Date |
| 01 | 3-Jan-08 | 04-Jan | 16-Jan |
| 01 | 1 -Feb-08 | 04-Feb | 14-Feb |
| 01 | 3-Mar-08 | 04-Mar | 14-Mar |
| 01 | 2-Apr-08 | 03-Apr | 15-Apr |
| 01 | 1-May-08 | 02-May | 14-May |
| 01 | 2-Jun-08 | 03-Jun | 13-Jun |
| 01 | 1-Jul-08 | 02-Jul | 15-Jul |
| 01 | 1-Aug-08 | 04-Aug | 14-Aug |
| 01 | 2-Sep-08 | 03-Sep | 15-Sep |
| 01 | 1-Oct-08 | 02-Oct | 14-Oct |
| 01 | 30-Oct-08 | 31-Oct | 12-Nov |
| 01 | 1-Dec-08 | 02-Dec | 12-Dec |
| 10 | 16-Jan-08 | 17-Jan | 29-Jan |
| 10 | $14-\mathrm{Feb}-08$ | $15-\mathrm{Feb}$ | 27-Feb |
| 10 | 14-Mar-08 | 17-Mar | 28-Mar |
| 10 | 15-Apr-08 | 16-Apr | 28-Apr |
| 10 | 14-May-08 | 15-May | 28-May |
| 10 | 13-Jun-08 | 16-Jun | 26-Jun |
| 10 | 16-Jul-08 | 17-Jul | 29-Jul |
| 10 | 14-Aug-08 | 15-Aug | 27-Aug |
| 10 | 15-Sep-08 | 16-Sep | 26-Sep |
| 10 | 14-Oct-08 | 15-Oct | 27-Oct |
| 10 | 12-Nov-08 | 13-Nov | 25-Nov |
| 10 | 12-Dec-08 | 15-Dec | 29-Dec |
| 19 | 29-Jan-08 | 30-Jan | 11-Feb |
| 19 | 27-Feb-08 | 28-Feb | 11-Mar |
| 19 | 28-Mar-08 | 31-Mar | 10-Apr |
| 19 | 28-Apr-08 | 29-Apr | 09-May |
| 19 | 28-May-08 | 29-May | 10-Jun |
| 19 | 26-Jun-08 | 27-Jun | 10-Jul |
| 19 | 29-Jul-08 | 30-Jul | 11-Aug |
| 19 | 27-Aug-08 | 28-Aug | 10-Sep |
| 19 | 26-Sep-08 | 29-Sep | 09-Oct |
| 19 | 27-Oct-08 | 28-Oct | 07-Nov |
| 19 | 25-Nov-08 | 26-Nov | 10-Dec |
| 19 | 29-Dec-08 | 30-Dec | 12-Jan |

Note: Due to the historic five day meter read window, the timeframe to read the customer's meter was two business days before and after the scheduled read date. The due dates shown above were for those bills issued on the corresponding Date to Bill above. If a meter was read during the two business days after the scheduled read date, the date to mail and due date was appropriately adjusted.

# KENTUCKY UTILITIES COMPANY 

CASE NO. 2009-00548

## Response to Fourth Data Request of Commission Staff Dated April 30, 2010

## Question No. 4

## Responding Witness: Butch Cockerill

Q-4. Refer to the response to Item 6 of the Association of Community Ministries' Second Request in Case No. 2009-00549 in which KU's sister company, Louisville Gas and Electric Company, states "[the] Company believes there is no need to change the deposit installment options currently available to customers required to make a deposit as a condition of reconnection." State whether KU likewise believes there is no need to change the deposit installment options currently available to its customers.

A-4. KU will not seek to change the deposit installment options currently available to its customers.


[^0]:    
    

    | Operating |
    | :---: |
    | Revenues |
    | $(2)$ |

    Adjustments to Operating Revenues, Operating Expenses and Net Operating Income

    | $\begin{array}{c}\text { Reference } \\ \text { Schedule } \\ \text { (1) }\end{array}$ |
    | :---: |

    $\underset{\sim}{\rightrightarrows} \underset{\sim}{\square} \underset{\sim}{\square}$ 1.20 $\underset{~}{\beth}$ 1.22 1.23 $\stackrel{\square}{4}$ $\cong$ İ $\stackrel{\infty}{\square} \stackrel{\text { N }}{-}$
    34. REVISED-Adjustment to reflect amortization of rate case expenses

[^1]:    Envronmental Complance
    Total Junsdictional ECR Rate Base at $10 / 31 / 09$
    Less:
    Less: Juns ECR Rate Base 'Ol and ${ }^{0} 03$ Plans
    Less: Juns ECR Rate Base Roll-In 05 and 06 Plans Junsidictional ECR Post 03 Rate Base

