

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR APPROVAL OF)	
REVISED RATES TO BE RECOVERED)	CASE NO.
THROUGH ITS GAS LINE TRACKER)	2014-00381
BEGINNING WITH THE FIRST BILLING)	
CYCLE FOR JANUARY, 2015)	

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 ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than ten days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. 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 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 should 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.

1. Refer to the Testimony of Lonnie E. Bellar in Case No. 2012-00222,¹ Bellar Exhibit 1, at page 6. Provide this schedule, GLT Form 1.5, showing forecasted projects for 2015.
2. Refer to Exhibit A of the application. Provide the number of bills for each of the five listed customer classes for the 12 months ended March 31, 2014.
3. Refer to Exhibit B, Page 1 of 1.
 - a. Explain why Column 2, the Accumulated Depreciation Reserve for December 2014, shows a debit balance of \$157,577.
 - b. Explain why it is appropriate for LG&E to earn a return on the Accumulated Depreciation Reserve debit balance of \$157,577.
 - c. Provide all calculations, entries, etc., showing all amounts and categories that produce the (\$1,899,588) Accumulated Depreciation Reserve balance for November 2015 shown in Column 13.

¹ Case No. 2012-00222, *Application of Louisville Gas and Electric for an Adjustment of its Electric and Gas Rates, a Certificate of Public Convenience and Necessity, Approval of Ownership of Gas Service Line and Risers, and a Gas Line Surcharge* (Ky. PSC, Dec. 20, 2012).

d. Provide all calculations, entries, etc., showing all amounts and categories that produce the (\$2,307,580) Accumulated Depreciation Reserve balance for December 2015 shown in Column 14.

e. Provide Exhibit B, page 1 of 1 in electronic format with formulas, rows, and cells intact.

4. Refer to Exhibit D, page 1 of 1. Provide all calculations, entries, etc., showing all amounts and categories that produce the amount of (\$1,665,302) shown for Reserve Retirements.

5. Refer to Exhibit D of LG&E's Gas Line Tracker ("GLT") application in Case No. 2013-00394,² and LG&E's Exhibit D in its current application. Riser Retirements are shown as being (\$3,375,560) for both 2014 and 2015. Explain why the amounts are the same in both years.

6. a. State the number of Risers LG&E replaced in 2013.

b. Based on the most recent information available, provide the number of Risers LG&E has replaced in 2014.


c. State the total number of Risers LG&E estimates it has left to replace for the remainder of the GLT program.

d. In its response to Item 1 of Staff's First Request for Information in Case No. 2014-00070,³ LG&E stated that no customers had replaced their own Risers. State whether any customers have replaced their own Risers since then.

² Case No. 2013-00394, *Revised Gas Line Tracker Filing of Louisville Gas and Electric Company* (Ky. PSC Dec. 13, 2013).

³ Case No. 2014-00070, *Revised Gas Line Tracker Filing of Louisville Gas and Electric Company* (Ky. PSC Apr. 29, 2014).

7. Identify generally the locations of the major main replacements that have occurred in 2014, and describe how those specific projects were selected and prioritized.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602

DATED **NOV 14 2014** _____

cc: Parties of Record

Robert Conroy
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

Honorable Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202