

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY AND KENTUCKY)	
UTILITIES COMPANY TO EXEMPT SHORT-)	CASE NO.
TERM RESIDENTIAL AND AGRICULTURAL)	2015-00350
LEASES FROM REQUIREMENT OF KENTUCKY)	
PUBLIC SERVICE COMMISSION IN CASE NO.)	
2002-00029 OF PRIOR APPROVAL OF ALL)	
SALES AND LEASES OF ANY LAND LOCATED)	
ON EXISTING GENERATION SITES)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") (collectively, the "Companies"), pursuant to 807 KAR 5:001, are to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due within 14 days of the date of this request. Responses to requests for information in paper medium 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 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.

The Companies shall make timely amendment to any prior response if they obtain 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 the Companies fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their 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 filing a paper containing personal information, the Companies 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, page 4, paragraph 9. The second sentence in the paragraph refers to land located at generating sites that is currently not needed for the construction of generation facilities as "typically used as buffer, fill or borrow, or is designated for future use." The fourth sentence in the paragraph indicates that land designated for future use is the subject of the requested exemption.

a. Identify the generating stations at which the Companies have land that is designated for future use.

b. Explain whether this designation could be changed in the future and describe the circumstances, if any, under which such a change could occur.

c. Explain whether land currently owned by LG&E or KU but not currently designated for future use could be designated as such in the future and describe the circumstances, if any, under which it might be so designated.

2. In the Application, page 4, paragraph 9, the fourth and eighth sentences refer to, respectively, "allow others to farm the land" and "[e]nsuring that the land was occupied or farmed also discouraged. . . ." Confirm that the term "agricultural leases" is intended to relate solely to circumstances in which the land is used to produce agricultural products and not those in which it is used for commercial storage or sale of such products.

3. In the Application, page 4, paragraph 9, the fourth sentence ends with "to have existing homes occupied until demolition begins."

a. Provide the number of such homes and the generating sites at which they are located.

b. Explain whether "existing homes" represent only residences that pre-date the development of the Companies' generating sites.

c. Explain whether demolition of existing homes is expected to occur solely in conjunction with the Companies making a future determination that the land is needed for construction.

d. In the case of residential leases, explain whether the residences are permanent structures or manufactured homes. For permanent structures, identify the party that typically owns the residence.

e. Provide the approximate percentage of residential and arable land as a percentage of the total land available for lease.

4. Refer to the Application, pages 4–5, paragraph 10, which states that given the nature and frequency of these types of leases, the Companies stopped entering into these types of leases after the decision in Case No. 2002-00029¹ (“2002 Order”) requiring prior Commission approval because it was too administratively burdensome to do so.

a. Confirm that any existing homes have been unoccupied for approximately 13 years.

b. Explain whether the Companies have maintained these properties in such a way that preserved their future function as residences and provide an estimate of the cost to maintain these properties. If any properties will need rehabilitation before they can be occupied, provide an estimate of the cost.

c. Explain whether the Companies carry vacant home insurance for the properties with existing homes. If so, provide an estimate of the cost.

d. Provide the number of agricultural leases and residential leases that the Companies entered into for the five years prior to the 2002 Order.

e. On an annual basis, how often do the Companies anticipate entering into these types of leases in the future?

DATED DEC 02 2015

cc: Parties of Record



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¹ Case No. 2002-00029, *Application of Louisville Gas and Electric Company and Kentucky Utilities Company for a Certificate of Public Convenience and Necessity for the Acquisition of Two Combustion Turbines* (Ky. PSC June 11, 2002).

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