

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF KENTUCKY UTILITIES)	
COMPANY AND LOUISVILLE GAS AND)	CASE NO.
ELECTRIC COMPANY FOR APPROVAL OF)	2016-00063
DEPRECIATION RATES FOR BROWN SOLAR)	

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

Kentucky Utilities Company and Louisville Gas and Electric Company (jointly, "the Companies"), pursuant to 807 KAR 5:001, are 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 on or before March 4, 2016. 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 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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, Exhibit 2, page 1, third full paragraph, which states, in part, “[t]he recommended depreciation rates for each other production plant account are based on an interim survivor curve, net salvage percent and probable retirement date. Each of these parameters are established with the general understanding of the new facility and the estimates of other comparable facilities across the United States. The overall lifespan of the facility is 25 years.”

a. Provide a schedule listing all comparable facilities used in the analysis broken down by location, type of solar technology (photovoltaic, etc.), and all other relevant criteria included in the comparison.

b. Provide a paper copy and an electronic version of all work papers, spreadsheets or other media utilized in determining the interim survivor curve, net

salvage percentage, the proposed depreciation rates and probable retirement date. Show all supporting calculations and provide the information in Excel spreadsheet format with cells and formulas intact.

c. Explain why the analysis was limited to comparable facilities in the United States.

d. Provide information detailing John Spanos's 25-year useful life determination.

2. Refer to the Application, Exhibit 2, the final paragraph, regarding a future depreciation study. What is the timeframe for a future study?

3. Provide copies of any and all depreciation studies performed by Mr. Spanos involving utility-scale solar photovoltaic facilities within the last five years.



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Acting Executive Director
Public Service Commission
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DATED **FEB 26 2016**

cc: Parties of Record

Case No. 2016-00063

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