

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENTUCKY INDUSTRIAL UTILITY)	
CUSTOMERS, INC.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2018-00034
)	
KENTUCKY UTILITIES COMPANY)	
AND)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANTS)	

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

Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") (jointly, "KU/LG&E"), 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 on or before February 6, 2018. 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.

KU/LG&E shall make timely amendment to any prior response if they obtain information that 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 KU/LG&E 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, KU/LG&E 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 Direct Testimony of Kent W. Blake ("Blake Testimony"). Provide Exhibits KWB-1 through KWB-6 in Excel spreadsheet format with formulas intact and unprotected, and all rows and columns fully accessible.

2. Refer to the Blake Testimony, page 11, line 17, through page 12, line 9, and to Exhibits KWB-4 and KWB-5.

- a. Provide the following information in support of the calculation of the proposed settlement surcredit rates for KU and LG&E Electric: the underlying data from KU's and LG&E Electric's last rate cases that establish the percentage of revenue from residential and non-residential customers.

b. Provide the kWh consumption information referenced on page 12, lines 7 and 8, which was relied upon in determining that the proposed allocation methodology based on percentage of revenue was more beneficial to the residential class.

3. Refer to the Blake Testimony, page 6, lines 14–15, and to Exhibit KWB-6. While the Blake Testimony, pages 11–12, states that KU/LG&E electric surcredits were allocated proportionally based on the percentage of revenue from residential and non-residential customers in KU/LG&E's last rate cases, and explains why that method was used, there is no explanation of the proposed allocation of surcredits to gas customers based on gas billing units.

a. Explain why the proposed LG&E Gas surcredits are based on total Ccf gas billing units, and why they were not calculated based on percentage of residential and non-residential revenue.

b. Provide the percentage of Ccf gas billing units from the residential and non-residential classes.

c. Provide the residential and non-residential revenues and their percentages from LG&E Gas's last rate cases.

d. Provide Exhibit KWB-6 showing calculations for the settlement surcredit rates for LG&E Gas using the same methodology of percentage of residential and non-residential revenue that was used for allocating electric surcredits. The Exhibit should be provided in Excel spreadsheet format with formulas intact and unprotected.


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DATED FEB 01 2018

cc: Parties of Record

Case No. 2018-00034

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