

Ms. Stephanie Stumbo, Executive Director Public Service Commission of Kentucky 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602

# RECEIVED

NOV 19 2008

## PUBLIC SERVICE COMMISSION

Louisville Gas and Electric Company State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.eon-us.com

Rick E. Lovekamp Manager – Regulatory Affairs T 502-627-3780 F 502-627-3213 rick lovekamp@eon-us.com

November 19, 2008

# RE: APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ORDER APPROVING ESTABLISHMENT OF A REGULATORY ASSET - Case No. 2008-00456

Dear Ms. Stumbo:

Enclosed please find an original and seven (7) copies of the Response of Kentucky Utilities Company to the Attorney General's Initial Requests for Information dated November 12, 2008, in the above-referenced proceeding.

Due to Greg Thomas unavailability to sign his verification page, the Company will file his verification page the week of November 24, 2008.

Please confirm your receipt of this information by placing the File Stamp of your Office on the enclosed additional copy. Should you have any questions regarding this transaction or this information, please contact me at (502) 627-3780.

Sincerely,

Rick E. Lovekamp

cc: Parties of Record

## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

#### APPLICATION OF LOUISVILLE GAS AND ELECTRIC ) COMPANY FOR AN ORDER APPROVING THE ESTABLISHMENT OF A REGULATORY ASSET

) CASE NO. ) 2008-00456

# **RESPONSE OF** LOUISVILLE GAS AND ELECTRIC COMPANY TO ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION DATED NOVEMBER 12, 2008

FILED: NOVEMBER 19, 2008

#### VERIFICATION

# STATE OF KENTUCKY ) ) SS: COUNTY OF JEFFERSON )

The undersigned, **Chris Hermann**, being duly sworn, deposes and says that he is Senior Vice President – Energy Delivery for Louisville Gas and Electric Company, 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.

CHRIS HERMANN

Subscribed and sworn to before me, a Notary Public in and before said County and State, this  $\underline{|Q^{H}|}$  day of November, 2008.

Victoria B. Harpor (SEAL)

My Commission Expires:

Sept 20,2010

# Response to Attorney General's Initial Request for Information Dated November 12, 2008

Case No. 2008-00456

## Question No. 1

- Q-1. With regard to Exhibit 1 attached *to* the 10/27/08 Petition, please provide the following information:
  - a. For each cost line item shown in the LG&E column (adding to the estimated cost of \$25,282,568), provide (1) the actual cost incurred to date, including actual source documentation supporting these actual costs; (2) the estimated remaining costs, including the basis for these estimated costs and any source documentation in support of the estimates.
  - b. For the \$2,088,192 contingency cost, explain what this contingency cost exactly represents; what the basis is for the \$2.1 million amount; and a breakout of the actual and estimated portions of the \$2.1 million.
  - c. Explain why the \$1,048,718 (\$2,294,228 + \$754,490) cost for internal LG&E and SERVCO employees is not duplicative of the internal LG&E and SERVCO employee base and overtime labor costs embedded in LG&E's current rates and to be included in the rates *to* be established in LG&E's pending rate case.
  - d. Explain the nature and purpose of the \$107,437 cost for the Staging Areas for Contractors.
  - e. Please indicate how the Company determined and calculated the estimated amounts considered normal operations for the Contractor Resource cost amounts of\$124,714, \$149,418 and \$20,000.
  - f. Please provide a detailed explanation for each of the Internal Employee Resource Cost adjustments for LG&E of \$(625,565), \$(239,866), and \$(12,352) shown on page 14 of the 10/27/08 Petition. In addition, explain how the Company determined and calculated these cost amounts.

A-1. a. See the enclosed CD which includes the actual cost incurred to date (through October 31, 2008) and estimated remaining costs. The Company will only seek recovery for actual costs incurred and not for any estimates or contingencies. On the attached schedules, the basis for the estimated costs is as follows:

1) Contractor estimates are for the companies that have not yet sent LG&E invoices and are based on estimated number of resources and hours worked.

2) Broadbent/Tom Sawyer estimates are based on estimated hours worked for security guards and estimated laundry fees and bedding costs.

3) As described in the response to part b below, the contingency has been adjusted to account for the differences between actual invoices received and original estimated costs.

- b. A financial model was utilized to estimate storm costs. The estimate includes a 10% contingency, which as proven reasonable, to allow for differences between actual and estimated costs. As invoices are received the contingency is used to offset differences between actual and estimated costs. Thus, the contingency amount will vary over time until a substantial amount of invoices has been received and the overall estimate can be refined. In any event, the Company will only seek recovery for actual cost incurred and not for any estimates or contingencies. The \$2,088,192 contingency in Exhibit 1 has been updated in the schedule referenced in the response to part a above to \$1,125,017 based on changes from actual invoices received to date.
- c. The \$3,048,718 represents the internal labor costs charged to the storm project from LG&E and SERVCO employees. The amounts at the bottom of Exhibit 1 in the "Estimated Amount Considered Normal Operations" of (\$625,565), (\$239,866) and (\$12,352) represent the labor costs for LG&E and SERVCO employees that are included in base rates. These figures represent the labor for employees that is normally charged to O&M expense. Since it is shown as an offset, the bottom line net figure on Exhibit 1 is not duplicative of internal employees' base labor costs embedded in LG&E's current rates.
- d. Due to the significant number of external resources that assisted LG&E in the storm restoration, staging areas were established at Tom Sawyer Park and Broadbent Arena to accommodate the contractors. The Company established sleeping and eating arrangements at these two sites. In addition, the sites were used for fueling trucks and used as an inventory site for material for the contractors' use. The \$107,437 cost includes a rental fee for the space, security, bedding costs and laundry services.

- e. The Company calculated the estimated amounts considered normal operations for the contractor resource costs amounts by reviewing contractors that normally work for LG&E ("resident contractors"). For resident contractors, the amounts listed in Exhibit 1 represent the estimated costs that these contractors would have charged to normal O&M work during the storm period.
- f. The Internal Employee Resource Cost adjustments for LG&E represent the portion of the O&M cost charged to the storm that would have been incurred in normal operations during the storm period. These amounts were derived by calculating employee costs associated with what would have been normal O&M work during the storm period. The (\$625,565) and (\$239,866) are amounts that LG&E and SERVCO employees charged to the LG&E storm but are normally charged to O&M expense for LG&E. The (\$12,352) is the amount that SERVCO employees charged to the KU storm but are normally charged to O&M expense for LG&E. These are the estimated amounts that are embedded in LG&E's base rates.

# Response to Attorney General's Initial Request for Information Dated November 12, 2008

Case No. 2008-00456

## **Question No. 2**

## Witness: Chris Hermann / Greg Thomas

- Q-2. With regard to the Internal Employee Labor Costs LG&E Employees of \$2,294,228, please provide the following information:
  - a. Was the \$2,294,228 internal labor cost incurred by existing LG&E employees who were on LG&E's payroll prior to and during the storm or is this cost associated with new employees hired by LG&E as a result of the storm?
  - b. Did LG&E hire additional employees specifically to address the storm? If so, provide all relevant details regarding these newly hired employees.
- A-2. a. The \$2,294,228 internal labor cost was incurred by existing LG&E employees.

b. No.

# Response to Attorney General's Initial Request for Information Dated November 12, 2008

Case No. 2008-00456

Question No. 3

# Witness: Chris Hermann / Greg Thomas

- Q-3. Reference LG&E's letter to the PSC dated Dec. 19, 2007, in Administrative Case No. 2006-00494. Attached to that letter is a document entitled, 'Vegetation Management Plan" ["VMP"]. As a result of the Hurricane Ike-related storm damage, has the company made any determinations as to whether it followed the VMP in all respects? Provide a complete explanation.
- A-3. Yes, the VMP has been followed in all respects.

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# Response to Attorney General's Initial Request for Information Dated November 12, 2008

Case No. 2008-00456

Question No. 4

- Q-4. Does the company envision any changes to the VMP as a result of the Hurricane Ike-related storm damage? Explain.
- A-4. No changes are envisioned to the VMP as a result of the Hurricane Ike storm damage. The Company employs a VMP that controls undesirable vegetation and includes natural or directional pruning and tree removals. The program includes flexibility to operate and maintain variable easement widths, differences between rural and urban service areas, and the need to maintain some level of flexibility in addressing landowner requests and concerns.

# Response to Attorney General's Initial Request for Information Dated November 12, 2008

Case No. 2008-00456

# Question No. 5

- Q-5. Media reports issued during the period of restoration work indicated that the storm caused approximately 500 poles to break, fall down or otherwise cause outages. Provide a data run indicating the serial numbers of the affected poles and the vintage of each such pole. If the data is not available for each pole, provide the best data available indicating the average vintage of the affected poles.
  - a. Provide any company policies with regard to pole inspection and replacement.
  - b. For each such affected pole, provide any and all data regarding the last inspection dates.
  - c. As a result of the Hurricane Ike storm-related damage, does the company foresee any changes to its policies regarding replacement and/or inspection of both transmission and distribution poles of any type or sort?
- A-5. Due to emergency conditions and urgency of repair, the serial number and vintage of each affected pole is not available. The average age of poles is 30 years.
  - a. Electric facilities, which include poles, are inspected as required by the Kentucky Public Service Commission per regulation 807 KAR 5:006 Section 25 – Inspection of Systems. Distribution poles are inspected externally for visible damage. Poles with ground line deficiencies are sounded and drilled to determine the extent of decay. In areas where poles appear to be solid, a representative sample of approximately 10% are sounded. Poles found to be deficient are replaced.
  - b. The locations and identity of the failed distribution poles from Hurricane Ike are not available. Each circuit is inspected every two years as required by the Kentucky Public Service Commission per regulation 807 KAR 5:006 Section 25 – Inspection of Systems. All circuits impacted by Hurricane Ike have been inspected within two years.

c. No. The company does not foresee any changes to its policies as a result of Hurricane Ike.

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# Response to Attorney General's Initial Request for Information Dated November 12, 2008

Case No. 2008-00456

Question No. 6

- Q-6. By what method does LG&E determine when right-of-way ["ROW'] maintenance is necessary - cycle timing, specific circuit-to-station reliability results, or by inspection of ROW? As a result of the Hurricane Re storm-related damage, does the company foresee any changes to these inspection policies? If not, why not?
- A-6. LG&E determines when right-of-way maintenance is necessary based on vegetation growth, cycle timing, reliability data, and visual inspections made by Arborists who are certified by the International Society of Arboriculture. No changes are envisioned as a result of the Hurricane Ike storm damage to the method to determine when right-of-way maintenance is necessary. LG&E employs a VMP that controls undesirable vegetation and includes natural or directional pruning and tree removals. The program includes flexibility to operate and maintain variable easement widths, differences between rural and urban service areas, and the need to maintain some level of flexibility in addressing landowner requests and concerns.

## Response to Attorney General's Initial Request for Information Dated November 12, 2008

Case No. 2008-00456

Question No. 7

- Q-7. Reference the company's response to PSC 2-9 (h) in Case No. 2006-00494, wherein the company stated it is capable of determining tree outage information by circuit number, the date, time and duration of each such outage, and a description of the cause of the outage. For each circuit in which the power outage resulting from Hurricane Re storm-related damage existed for more than four (4) days, provide the last date on which the circuit was inspected for ROW maintenance and VMP needs.
  - a. Identify any and all circuits for which the company failed to adhere to the VMP.
  - b. For each circuit in which the power outage resulting from Hurricane Ike storm-related damage existed for more than four (4) days, identify how many fell within the "worst performing circuit plan" set forth on page 4 of the E.ON VMP provided to the PSC in Case No. 2006-00494 (attached in the company's letter to the PSC dated Dec. 19,2007).
- A-7. Please see the attachment. The "Circuit List" identifies 300 circuits on which a customer was without power due to Hurricane Ike damage for more than four (4) days and provides the last date on which the circuit was trimmed.
  - a. All circuits comply with the VMP.
  - b. There were 14 circuits on the attached list of 300 circuits that were included in the "worst performing circuit plan".

Compony	OpCenter	Local Area	Substation	Circuit	Trim Date	WPC
<u>Company</u>						
<u>_GE</u>	AOC	ALGONQUIN	ALGONQUIN	AL1442	Sep-07	
LGE	AOC	ALGONQUIN	ALGONQUIN	AL1443	Sep-07	yes
LGE	AOC	ALGONQUIN	ALGONQUIN	AL1444	Sep-07	
LGE	AOC	AUBURNDALE	ASHBOTTOM	AS1417	Sep-05	
LGE	AOC	VALLEY STATION	ASHBY	AB1202	Sep-07	
LGE	AOC	VALLEY STATION	ASHBY	AB1203	Sep-07	
LGE	AOC	VALLEY STATION	ASHBY	AB1204	Sep-07	
LGE	AOC	VALLEY STATION	ASHBY	AB1205	Jun-05	
LGE	AOC	VALLEY STATION	ASHBY	AB1206	Jun-05	
LGE	AOC	VALLEY STATION	ASHBY	AB1207	Jun-05	
LGE	AOC	NEWBURG / BUECHEL	BISHOP	BI1218	Sep-05	
LGE	AOC	NEWBURG / BUECHEL	BISHOP	BI1219	Sep-05	
LGE	AOC	NEWBURG / BUECHEL	BISHOP	BI1220	Oct-05	
LGE	AOC	NEWBURG / BUECHEL	BISHOP	BI1223	Sep-05	
LGE	AOC	NEWBURG / BUECHEL	BISHOP	BI1224	Sep-05	
LGE	AOC	SOUTH DIXIE	BRANDENBURG	BB1103	Mar-05	
LGE	AOC	LOUISVILLE (DOWNTOWN)	CANAL	CA1304	Aug-07	
LGE	AOC	CANE RUN	CANE RUN	CR1422	Dec-06	
LGE	AOC	LOUISVILLE (DOWNTOWN)	CARTER	CT0001	Sep-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	CARTER	CT0002	Sep-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	CARTER	СТ0004	Sep-07	
LGE	AOC	Û OF L / GERMANTOWN	CLARKS LANE	CK0001	Apr-07	
LGE	AOC	U OF L / GERMANTOWN	CLARKS LANE	CK0002	Apr-07	
LGE	AOC	LOUISVILLE (EAST)		CY1481	Jun-07	
LGE	AOC	LOUISVILLE (EAST)		CY1482	Jun-07	

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Company	OpCenter	Local Area	<u>Substation</u>	Circuit	Trim Date	WPC
LGE	AOC	LOUISVILLE (EAST)	CLAY - LGE	CY1484	Jun-07	
LGE	AOC	LOUISVILLE (EAST)	CLAY - LGE	CY1486	Jun-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	CROP	CB0001	Aug-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	CROP	СВ0002	Aug-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	CROP	CB0004	Aug-07	
LGE	AOC	LOUISVILLE (WEST)	DEL PARK	DE1410	Dec-07	
LGE	AOC	ALGONQUIN	DIXIE	DX1220	Aug-07	
LGE	AOC	ALGONQUIN	DIXIE	DX1221	Jun-07	
LGE	AOC	ALGONQUIN	DIXIE	DX1222	Jun-07	
LGE	AOC	ALGONQUIN	DIXIE	DX1223	Jun-07	
LGE	AOC	ALGONQUIN	DUMESNIL	DU0002	Dec-07	
LGE	AOC	ALGONQUIN	DUMESNIL	DU0003	Dec-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	EIGHTH STREET	E10001	Jun-07	
LGE	AOC	NEWBURG / BUECHEL	ETHEL	ET1166	Jun-07	
LGE	AOC	NEWBURG / BUECHEL	ETHEL	ET1167	Aug-06	yes
LGE	AOC	NEWBURG / BUECHEL	ETHEL	ET1168	Aug-06	
LGE	AOC	NEWBURG / BUECHEL	ETHEL	ET1169	Jun-06	
LGE	AOC	NEWBURG / BUECHEL	ETHEL	ET1171	Aug-06	
LGE	AOC	NEWBURG / BUECHEL	ETHEL	ET1172	Mar-08	
LGE	AOC	NEWBURG / BUECHEL	ETHEL	ET1173	Jun-06	
LGE	AOC	CANE RUN	FARNSLEY	FA1123	Nov-08	*****
LGE	AOC	CANE RUN	FARNSLEY	FA1149	Sep-05	
LGE	AOC	CANE RUN	FARNSLEY	FA1214	Nov-08	
LGE	AOC	CANE RUN	FARNSLEY	FA1215	Nov-08	
LGE	AOC	CANE RUN	FARNSLEY	FA1216	Sep-05	

Company	<u>OpCenter</u>	Local Area	Substation	<u>Circuit</u>	Trim Date	WPC
LGE	AOC	OKOLONA	FERN VALLEY	FV1134	Sep-05	
LGE	AOC	OKOLONA	FERN VALLEY	FV1135	Nov-08	
LGE	AOC	OKOLONA	FERN VALLEY	FV1138	Nov-08	
LGE	AOC	OKOLONA	FERN VALLEY	FV1139	Nov-08	
LGE	AOC	OKOLONA	FERN VALLEY	FV1141	Nov-08	
LGE	AOC	OKOLONA	FERN VALLEY	FV1142	Nov-08	
LGE	AOC	OKOLONA	FERN VALLEY	FV1143	Nov-08	
LGE	AOC	OKOLONA	FERN VALLEY	FV1477	Oct-05	
LGE	AOC	U OF L / GERMANTOWN	FLOYD	FL1496	Aug-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	FORTY FOURTH STREET	F00001	Dec-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	FORTY FOURTH	F00002	Dec-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	FORTY FOURTH	F00003	Dec-07	
LGE	AOC	LOUISVILLE (WEST)	GAULBERT	GA0001	Dec-07	
LGE	AOC	LOUISVILLE (WEST)	GAULBERT	GA0002	Dec-07	
LGE	AOC	LOUISVILLE (WEST)	GAULBERT	GA0003	Dec-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	GILLIGAN	G10001	Sep-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	GILLIGAN	G10003	Sep-07	
LGE	AOC	LOUISVILLE (WEST)	GRADY B	GR1124	Jun-07	
LGE	AOC	LOUISVILLE (WEST)	GRAND	GD0001	Dec-07	
LGE	AOC	LOUISVILLE (WEST)	GRAND	GD0002	Dec-07	
LGE	AOC	LOUISVILLE (WEST)	GRAND	GD0004	Dec-07	
LGE	AOC	LOUISVILLE (EAST)	HANCOCK	HN1204	Jun-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	HERMAN	HE0001	Apr-03	
LGE	AOC	LOUISVILLE (DOWNTOWN)	HERMAN	HE0002	Dec-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	HERMAN	HE0004	Dec-07	

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Company	OpCenter	Local Area	Substation	Circuit	Trim Date	WPC
GE	AOC	PRP	INTERNATIONAL	IN1290	Dec-06	
_GE	AOC	PRP	INTERNATIONAL	IN1291	Dec-06	
LGE	AOC	PRP	INTERNATIONAL	IN1292	Dec-06	
LGE	AOC	PRP	INTERNATIONAL	IN1293	Dec-06	
LGE	AOC	AUBURNDALE	KENWOOD	KE1156	Mar-08	
LGE	AOC	AUBURNDALE	KENWOOD	KE1157	Mar-08	
LGE	AOC	AUBURNDALE	KENWOOD	KE1158	Nov-08	
LGE	AOC	AUBURNDALE	KENWOOD	KE1159	Jun-05	
LGE	AOC	AUBURNDALE	KENWOOD	KE1160	Jun-05	
LGE	AOC	AUBURNDALE	KENWOOD	KE1161	Jun-05	
LGE	AOC	U OF L / GERMANTOWN	LOCUST	LO1190	Mar-08	
LGE	AOC	U OF L / GERMANTOWN	LOCUST	LO1192	Jun-07	
LGE	AOC	U OF L / GERMANTOWN	LOCUST	LO1193	Jun-07	
LGE	AOC	U OF L / GERMANTOWN	LYNN	LN0001	Jun-07	
LGE	AOC	U OF L / GERMANTOWN	LYNN	LN0002	Jun-07	
LGE	AOC	U OF L / GERMANTOWN	LYNN	LN0003	Jun-07	
LGE	AOC	LOUISVILLE (EAST)	MADISON	MD1451	Dec-06	
LGE	AOC	LOUISVILLE (DOWNTOWN)	MAGAZINE	MG0407	Sep-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	MAGAZINE	MG0411	Sep-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	MAGAZINE	MG0417	Sep-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	MAGAZINE	MG1328	Sep-07	
LGE	AOC	FAIRDALE	MANSLICK	MK1295	Dec-05	
LGE	AOC	FAIRDALE	MANSLICK	MK1296	Sep-05	·····
LGE	AOC	FAIRDALE	MANSLICK	MK1297	Jun-08	yes
LGE	AOC	FAIRDALE	MANSLICK	MK1298	Dec-06	

Company	OpCenter	Local Area	Substation	<u>Circuit</u>	Trim Date	WPC
LGE	AOC	FAIRDALE	MANSLICK	MK1299	Jun-05	
LGE	AOC	VALLEY STATION	MILL CREEK - LGE	MC1261	Dec-07	
LGE	AOC	VALLEY STATION	MILL CREEK - LGE	MC1262	Mar-08	
LGE	AOC	SOUTH PRESTON	MUD LANE	ML1281	Mar-07	·*···
LGE	AOC	SOUTH PRESTON	MUD LANE	ML1282	Mar-07	
LGE	AOC	SOUTH PRESTON	MUD LANE	ML1283	Mar-07	
LGE	AOC	SOUTH PRESTON	MUD LANE	ML1284	Apr-07	
LGE	AOC	SOUTH PRESTON	MUD LANE	ML1285	Apr-07	
LGE	AOC	SOUTH PRESTON	MUD LANE	ML1288	Nov-08	
LGE	AOC	SOUTH DIXIE	MULDRAUGH	MU1101	Dec-04	
LGE	AOC	OKOLONA	OKOLONA	OK1271	Mar-08	
LGE	AOC	OKOLONA	OKOLONA	OK1272	Jun-08	
LGE	AOC	OKOLONA	OKOLONA	OK1273	Jun-08	
LGE	AOC	OKOLONA	OKOLONA	OK1274	Sep-07	
LGE	AOC	OKOLONA	OKOLONA	OK1275	Oct-05	
LGE	AOC	LOUISVILLE (EAST)	ORMSBY	OR0001	Jun-07	
LGE	AOC	LOUISVILLE (EAST)	ORMSBY	OR0002	Jun-07	
LGE	AOC	LOUISVILLE (EAST)	ORMSBY	OR0003	Jun-07	
LGE	AOC	CANE RUN	PADDYS RUN	PR1389	Jun-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	PIRTLE	P10001	Jun-07	
LGE	AOC		PIRTLE	P10002	Jun-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	PIRTLE	PI0003	Jun-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	PIRTLE	P10004	Jun-07	
LGE	AOC	PRP	PLEASURE RIDGE	PL1270	Nov-06	
LGE	AOC	PRP	PLEASURE RIDGE	PL1271	Nov-06	

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Company	OpCenter	Local Area	Substation	Circuit	Trim Date	WPC
LGE	AOC	PRP	PLEASURE RIDGE	PL1272	Nov-06	
LGE	AOC	PRP	PLEASURE RIDGE	PL1274	Nov-06	
LGE	AOC	U OF L / GERMANTOWN	SEMINOLE	SM1232	Sep-05	
LGE	AOC	U OF L / GERMANTOWN	SEMINOLE	SM1233	Nov-08	
LGE	AOC	U OF L / GERMANTOWN	SEMINOLE	SM1234	Nov-08	
LGE	AOC	ALGONQUIN	SEVENTH STREET	SE0002	Sep-07	
LGE	AOC	ALGONQUIN	SEVENTH STREET	SE0003	Sep-07	
LGE	AOC	ALGONQUIN	SEVENTH STREET	SE0004	Sep-07	
LGE	AOC	LOUISVILLE (WEST)	SHAWNEE	SN0001	Dec-07	
LGE	AOC	LOUISVILLE (WEST)	SHAWNEE	SN0004	Dec-07	
LGE	AOC	SOUTH PRESTON	SHEPHERDSVILLE	SV1121	Nov-08	
LGE	AOC	SOUTH PRESTON	SHEPHERDSVILLE	SV1122	Nov-08	
LGE	AOC	SHIVELY	SHIVELY	SH1281	Aug-06	
LGE	AOC	SHIVELY	SHIVELY	SH1282	Aug-06	
LGE	AOC	SHIVELY	SHIVELY	SH1284	Aug-06	
LGE	AOC	SHIVELY	SHIVELY	SH1285	Aug-06	
LGE	AOC	SHIVELY	SHIVELY	SH1457	Aug-06	
LGE	AOC	OKOLONA	SMYRNA	SY1250	Dec-06	
LGE	AOC	OKOLONA	SMYRNA	SY1251	Dec-06	
LGE	AOC	OKOLONA	SMYRNA	SY1252	Dec-06	
LGE	AOC	OKOLONA	SMYRNA	SY1253	Dec-06	
LGE	AOC	OKOLONA	SMYRNA	SY1255	Mar-07	
LGE	AOC	FAIRDALE	SOUTH PARK	SP1114	Dec-05	
LGE	AOC	FAIRDALE	SOUTH PARK	SP1115	Dec-06	
LGE	AOC	FAIRDALE	SOUTH PARK	SP1116	Apr-07	

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Company	<u>OpCenter</u>	Local Area	Substation	Circuit	Trim Date	WPC
LGE	AOC	ALGONQUIN	SOUTHERN	SO0405	Sep-07	
LGE	AOC	ALGONQUIN	SOUTHERN	SO0410	Sep-07	
LGE	AOC	ALGONQUIN	SOUTHERN	SO0421	Sep-07	
LGE	AOC	ALGONQUIN	SOUTHERN	SO0422	Sep-07	
LGE	AOC	ALGONQUIN	SOUTHERN	SO0453	Sep-07	
LGE	AOC	SHIVELY	STEWART	SW1184	Feb-07	yes
LGE	AOC	SHIVELY	STEWART	SW1186	Aug-06	
LGE	AOC	SHIVELY	STEWART	SW1187	Mar-07	Min.4
LGE	AOC	SHIVELY	STEWART	SW1188	Aug-06	
LGE	AOC	SHIVELY	STEWART	SW1190	Dec-05	
LGE	AOC	SHIVELY	STEWART	SW1191	Jan-05	
LGE	AOC	PRP	TERRY	TE1242	Mar-08	
LGE	AOC	PRP	TERRY	TE1243	Mar-08	
LGE	AOC	PRP	TERRY	TE1244	Mar-08	
LGE	AOC	SOUTH DIXIE	TIP TOP	TT3313	Dec-06	
LGE	AOC	LOUISVILLE (WEST)	VERMONT	VE0001	Dec-07	****
LGE	AOC	LOUISVILLE (WEST)	VERMONT	VE0002	Dec-07	
LGE	AOC	LOUISVILLE (WEST)	VERMONT	VE0003	Dec-07	
LGE	AOC	SOUTH DIXIE	WEST POINT	WP1104	Aug-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	WESTERN	WE0001	Jun-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	WESTERN	WE0003	Jun-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	WESTERN	WE0005	Jun-07	
LGE	AOC	LOUISVILLE (DOWNTOWN)	WESTERN	WE0006	Jun-07	
LGE	EOC	MIDDLETOWN	AIKEN	AK1289	Mar-08	
LGE	EOC	MIDDLETOWN	AIKEN	AK1290	Jul-07	

Company	OpCenter	Local Area	Substation	<u>Circuit</u>	Trim Date	WPC
LGE	EOC	MIDDLETOWN	AIKEN	AK1291	Sep-07	
LGE	EOC	MIDDLETOWN	AIKEN	AK1292	Jun-08	
LGE	EOC	MIDDLETOWN	AIKEN	AK1294	Mar-08	
LGE	EOC	MIDDLETOWN	AIKEN	AK1295	Jun-07	
LGE	EOC	HURSTBOURNE	BLUEGRASS PARKWAY	BY1281	Jun-06	
LGE	EOC	HURSTBOURNE	BLUEGRASS PARKWAY	BY1282	Jun-06	
	EOC	HURSTBOURNE	BLUEGRASS PARKWAY	BY1283	Jun-06	
LGE		HUKSIBUUKINE	BLUEGRASS		Jun-00	
LGE	EOC	HURSTBOURNE	PARKWAY	BY1284	Jun-06	
LGE	EOC	HURSTBOURNE	BLUEGRASS PARKWAY	BY1285	Sep-05	
LGE	EOC	ST MATTHEWS	BRECKENRIDGE	BR1176	Jun-08	
LGE	EOC	ST MATTHEWS	BRECKENRIDGE	BR1177	Jan-06	
LGE	EOC	ST MATTHEWS	BRECKENRIDGE	BR1179	Jun-08	
LGE	EOC	ST MATTHEWS	BRECKENRIDGE	BR1180	Dec-06	
LGE	EOC	ST MATTHEWS	BRECKENRIDGE	BR1181	Dec-06	
LGE	EOC	ST MATTHEWS	BRECKENRIDGE	BR1185	Nov-08	
LGE	EOC	ST MATTHEWS	BRECKENRIDGE	BR1186	Dec-05	yes
LGE	EOC	ST MATTHEWS	BRECKENRIDGE	BR1351	Dec-05	
LGE	EOC	CRESTWOOD	CENTERFIELD	CF1201	Jul-05	
LGE	EOC	CRESTWOOD	CENTERFIELD	CF1202	Apr-06	
LGE	EOC	CRESTWOOD	CENTERFIELD	CF1204	Mar-08	yes
LGE	EOC	BROWNSBORO RD	CLIFTON	CL1226	Dec-06	****
LGE	EOC	BROWNSBORO RD	CLIFTON	CL1227	Dec-06	
LGE	EOC	BROWNSBORO RD	CLIFTON	CL1229	Dec-06	
LGE	EOC	BROWNSBORO RD	CLIFTON	CL1230	Dec-06	
LGE	EOC	BROWNSBORO RD	CLIFTON	CL1232	Dec-06	

Company	<u>OpCenter</u>	Local Area	Substation	Circuit	Trim Date	WPC
GE	EOC	BROWNSBORO RD	CLIFTON	CL1403	Dec-06	
GE	EOC	ANCHORAGE	COLLINS	CO1192	Dec-07	
LGE	EOC	ANCHORAGE	COLLINS	CO1194	Dec-07	
LGE	EOC	ANCHORAGE	COLLINS	CO1195	Dec-07	
LGE	EOC	ANCHORAGE	COLLINS	CO1196	Dec-07	
LGE	EOC	ANCHORAGE	COLLINS	CO1197	Dec-07	
LGE	EOC	CRESTWOOD	CRESTWOOD	CW1222	Dec-06	<b></b>
LGE	EOC	CRESTWOOD	CRESTWOOD	CW1225	Nov-08	
LGE	EOC	CRESTWOOD	CRESTWOOD	CW1226	Feb-07	
LGE	EOC	CRESTWOOD	CRESTWOOD	CW1228	Oct-07	
LGE	EOC	EOC CENTRAL	DAHLIA	DA1237	Jun-07	
LGE	EOC	EOC CENTRAL	DAHLIA	DA1238	Jun-07	~
LGE	EOC	EOC CENTRAL	DAHLIA	DA1239	Mar-08	
LGE	EOC	EOC CENTRAL	DAHLIA	DA1240	Mar-08	
LGE	EOC	EOC CENTRAL	DAHLIA	DA1241	Jul-07	
LGE	EOC	EOC CENTRAL	DAHLIA	DA1242	Jun-08	
LGE	EOC	EOC CENTRAL	DAHLIA	DA1243_	Sep-07	
LGE	EOC	FERN CREEK	FAIRMOUNT	FM1256	Mar-07	
LGE	EOC	FERN CREEK	FAIRMOUNT	FM1257	Jan-05	
LGE	EOC	FERN CREEK	FAIRMOUNT	FM1259	Jun-08	
LGE	EOC	FERN CREEK	FAIRMOUNT	FM1261	Nov-07	
LGE	EOC	FERN CREEK	FAIRMOUNT	FM1262	Nov-07	
LGE	EOC	ANCHORAGE	FREYS HILL	FH1209	Dec-07	
LGE	EOC	ANCHORAGE	FREYS HILL	FH1210	Dec-07	
LGE	EOC	ANCHORAGE	FREYS HILL	FH1213	Dec-07	

Company	OpCenter	Local Area	Substation	<u>Circuit</u>	Trim Date	WPC
LGE	EOC	ANCHORAGE	FREYS HILL	FH1214	Jul-06	
LGE	EOC	PROSPECT / GOSHEN	HARMONY LANDING	HL1155	Nov-08	
LGE	EOC	PROSPECT / GOSHEN	HARMONY LANDING	HL1157	Jan-06	
LGE	EOC	PROSPECT / GOSHEN	HARMONY LANDING	HL1158	May-05	
LGE	EOC	PROSPECT / GOSHEN	HARRODS CREEK	HK1233	Jul-06	
LGE	EOC	PROSPECT / GOSHEN	HARRODS CREEK	HK1234	Dec-06	
LGE	EOC	PROSPECT / GOSHEN	HARRODS CREEK	HK1235	Jan-07	
LGE	EOC	PROSPECT / GOSHEN	HARRODS CREEK	HK1237	Jul-06	
LGE	EOC	PROSPECT / GOSHEN	HARRODS CREEK	HK1238	Aug-06	
LGE	EOC	EOC CENTRAL	HIGHLAND	HI1101	Nov-08	yes
LGE	EOC	EOC CENTRAL	HIGHLAND	HI1102	Nov-08	yes
LGE	EOC	EOC CENTRAL	HIGHLAND	HI1103	Jun-08	
LGE	EOC	EOC CENTRAL	HIGHLAND	HI1104	Jun-08	
LGE	EOC	EOC CENTRAL	HIGHLAND	HI1105	Jun-08	
LGE	EOC	EOC CENTRAL	HIGHLAND	HI1475	Nov-08	
LGE	EOC	BROWNSBORO RD	HILLCREST	HC1290	Dec-06	
LGE	EOC	BROWNSBORO RD	HILLCREST	HC1291	Jan-06	
LGE	EOC	BROWNSBORO RD	HILLCREST	HC1292	Mar-08	
LGE	EOC	BROWNSBORO RD	HILLCREST	HC1293	Nov-08	
LGE	EOC	BROWNSBORO RD	HILLCREST	HC1294	Dec-07	yes
LGE	EOC	BROWNSBORO RD	HILLCREST	HC1435	Dec-06	yes
LGE	EOC	HURSTBOURNE	HURSTBOURNE	HB1142	Jul-07	
LGE	EOC	HURSTBOURNE	HURSTBOURNE	HB1145	Mar-07	
LGE	EOC	HURSTBOURNE	HURSTBOURNE	HB1148	Dec-06	
LGE	EOC	HURSTBOURNE	HURSTBOURNE	HB1150	Jul-07	

Company	OpCenter	Local Area	Substation	<u>Circuit</u>	Trim Date	WPC
LGE	EOC	HURSTBOURNE	JEFFERSONTOWN	JT1120	Jul-06	yes
LGE	EOC	HURSTBOURNE	JEFFERSONTOWN	JT1121	Mar-06	
LGE	EOC	HURSTBOURNE	JEFFERSONTOWN	JT1122	Apr-07	
LGE	EOC	HURSTBOURNE	JEFFERSONTOWN	JT1123	Mar-06	
LGE	EOC	HURSTBOURNE	JEFFERSONTOWN	JT1124	Mar-06	yes
LGE	EOC	LYNDON	LYNDON	LY1111	Mar-08	
LGE	EOC	LYNDON	LYNDON	LY1112	Dec-07	
LGE	EOC	LYNDON	LYNDON	LY1163	Sep-07	
LGE	EOC	LYNDON	LYNDON	LY1164	Dec-07	
LGE	EOC	LYNDON	LYNDON SOUTH	LS1245	Dec-07	
LGE	EOC	LYNDON	LYNDON SOUTH	LS1247	Dec-07	
LGE	EOC	LYNDON	LYNDON SOUTH	LS1248	Feb-07	
LGE	EOC	EOC CENTRAL	NACHAND	NA1264	Jul-06	
LGE	EOC	EOC CENTRAL	NACHAND	NA1266	Sep-06	
LGE	EOC	EOC CENTRAL	NACHAND	NA1267	Jul-06	
LGE	EOC	EOC CENTRAL	NACHAND	NA1268	Jul-06	
LGE	EOC	EOC CENTRAL	NACHAND	NA1269	Sep-06	
LGE	EOC	EOC CENTRAL	NACHAND	NA1271	Sep-06	
LGE	EOC	ST MATTHEWS	OXMOOR	OX1273	Dec-07	
LGE	EOC	ST MATTHEWS	OXMOOR	OX1274	Dec-07	
LGE	EOC	ST MATTHEWS	OXMOOR	OX1277	Dec-07	W.M.&.B.A. Hastan A.V. &
LGE	EOC	ST MATTHEWS	PLAINVIEW	PV1250	Sep-07	
LGE	EOC	ST MATTHEWS	PLAINVIEW	PV1251	Nov-07	
LGE	EOC	ST MATTHEWS	PLAINVIEW	PV1252	Dec-07	
LGE	EOC	ST MATTHEWS	PLAINVIEW	PV1253	Dec-07	

Company	OpCenter	Local Area	<u>Substation</u>	Circuit	Trim Date	WPC
LGE	EOC	ST MATTHEWS	PLAINVIEW	PV1254	Dec-07	
LGE	EOC	PROSPECT / GOSHEN PROSPECT /	SKYLIGHT	SK1127	Feb-05	
LGE	EOC	GOSHEN	SKYLIGHT	SK1128	Nov-08	
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1105	Sep-07	,
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1106	Sep-07	~
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1130	Jul-07	
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1132	Mar-06	
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1133	Sep-07	
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1134	Sep-06	
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1138	Apr-06	
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1172	Feb-07	
LGE	EOC	BROWNSBORO RD	TAYLOR	TA1173	Jul-07	
LGE	EOC	FERN CREEK	WATTERSON	WT1151	Jan-06	
LGE	EOC	FERN CREEK	WATTERSON	WT1152	Jan-06	
LGE	EOC	FERN CREEK	WATTERSON	WT1154	Dec-06	
LGE	EOC	FERN CREEK	WATTERSON	WT1209	Dec-06	
LGE	EOC	FERN CREEK	WATTERSON	WT1210	Jun-06	
LGE	EOC	FERN CREEK	WATTERSON	WT1211	Aug-06	
LGE	EOC	FERN CREEK	WATTERSON	WT1212	Dec-06	
LGE	EOC	MIDDLETOWN	WHAS	WH1115	Dec-07	yes
LGE	EOC	MIDDLETOWN	WHAS	WH1116	Mar-08	
LGE	EOC	ANCHORAGE	WORTHINGTON	WO1176	Mar-08	
LGE	EOC	ANCHORAGE	WORTHINGTON	W01177	Mar-08	
LGE	EOC	ANCHORAGE	WORTHINGTON	WO1178	Mar-08	
LGE	EOC	ANCHORAGE	WORTHINGTON	WO1179	Sep-07	

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Response to Attorney General's Initial Request for Information Dated November 12, 2008

Case No. 2008-00456

**Question No. 8** 

- Q-8. Given the severity of the damage to the company's system resulting from Hurricane Ike, does the company anticipate any changes to trim cycles for any affected circuits?
- A-8. No changes to the trim cycle are anticipated. The VMP includes the flexibility of a multi-cycle strategy to address growth and tree density which will vary across the service area.