

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS) CASE NO.
ELECTRIC RATES AND FOR CERTIFICATES OF) 2016-00370
OF PUBLIC CONVENIENCE AND NECESSITY)

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS) CASE NO.
ELECTRIC AND GAS RATES AND FOR CERTIFICATES) 2016-00371
OF PUBLIC CONVENIENCE AND NECESSITY)

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Kentucky Industrial Utility Customers, Inc. ("KIUC"), pursuant to 807 KAR 5:001, is to file with the Commission an original and six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before April 28, 2017. 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.

KIUC 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 KIUC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its 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, KIUC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to the Supplemental Testimony of Stephen J. Baron, pages 4-8, wherein Mr. Baron discusses his contention that the hourly load projection methodology used for the revised cost-of-service studies filed by Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") continue to produce unreliable results. The majority of Mr. Baron's discussion centers on KU's FLS tariff. State whether Mr. Baron believes that the results of the revised LG&E cost-of-service study are unreliable.



Talina R. Mathews
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Public Service Commission
P.O. Box 615
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DATED APR 21 2017

cc: Parties of Record

Case No. 2016-00370
Case No. 2016-00371

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