

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) 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 SIXTH REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC
COMPANY

Kentucky Utilities Company and Louisville Gas and Electric Company (jointly "KU/LG&E"), pursuant to 807 KAR 5:001, are to file with the Commission an original with six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before May 5, 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.

KU/LG&E 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 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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 document so that personal information cannot be read.

1. Refer to KU/LG&E's response to Commission Staff's Fourth Request for Information ("Staff's Fourth Request"), Item 1, Attachment 1, page 3 of 5.

a. For the forecasted test year, provide the amount of healthcare/medical insurance expense KU/LG&E would have incurred, assuming the total cost equals the premium for each level of coverage plus the deductible, and that for single coverage the employee would pay 21 percent of the total cost, and for all other types of coverage the employee would pay 32 percent of the total cost, compared

to the amount of health/medical insurance expense included in the test year. The amount should be calculated as follows: Total Healthcare/Medical Cost = Company paid portion of premium + Employee Contribution to premium + Employee Deductibles. The response should include all parts of this equation.

b. Using the same assumptions as in Item 1.a. above, provide the amount that KU/LG&E would have incurred in the forecasted test year, sub-totaled by employee class, i.e., Executive, Exempt, Non-Exempt, etc., if only the non-union employees were required to pay for coverage based on the percentages listed in Item a. above compared to the amount of health/medical insurance expense included in the test year.

c. For the forecasted test year, provide the amount of dental insurance expense LG&E/KU would have incurred, assuming the total cost equals the premium for each level of coverage plus the deductible, and that for single coverage the employee would pay 21 percent of the total cost, and for all other types of coverage the employee would pay 32 percent of the total cost, compared to the amount of dental insurance expense included in the test year. The amount should be calculated as Total Dental Cost = Company-paid portion of premium + Employee Contribution to premium + Employee Deductibles. The response should include all parts of this equation.

d. Using the same assumptions as in Item c. above, provide the amount of dental insurance expense that KU/LG&E would have incurred in the forecasted test year, sub-totaled by employee class, i.e., Executive, Exempt, Non-Exempt, etc., if only the non-union employees were required to pay for coverage based

on the percentages listed in Item c. above compared to the amount of dental insurance expense included in the test year.

e. For the forecasted test year, provide the amount of long-term disability expense KU/LG&E would have incurred, assuming the total cost equals the premium for each level of coverage and if employees are required to contribute to the plan cost.

f. Provide the number of all employees with life insurance coverage over \$50,000 and the total cost of the life insurance paid by KU/LG&E for coverage above the \$50,000 threshold for all such employees.

g. Provide the maximum level of life insurance coverage that KU/LG&E pay for its employees.

h. Confirm that KU/LG&E does not provide company-paid life insurance coverage in excess of \$50,000 for union employees.

2. Refer to KU/LG&E's response to Staff's Fourth Request, Item 1, Attachment 3, page 1.

a. State whether the amounts listed under Incentive/Bonus are recorded as an expense on the books of KU/LG&E and included for ratemaking purposes, or are paid by shareholders.

b. Explain how the Incentive/Bonus is determined.

3. Refer to KU/LG&E's response to Staff's Fourth Request, Item 6.

a. State whether there are employees who participate in both the *Retirement Plan – eligible if hired prior to 1/1/06* – and the *401(k) Savings Plan Company Match*.

b. If the answer to Item 3.a. above is affirmative, state which employee classes are participating, i.e., Executive, Exempt, Non-Exempt, Union, Wage, etc., and the number of employees participating.

c. If the answer to Item 3.a. above is affirmative, provide the total amount and sub-total amounts by employee grouping that were paid by KU/LG&E under the 401(k) Savings Plan Company Match for those identified employees.

d. State whether employees can participate in both the *Savings Plan Retirement Income Account (RIA) – eligible if hired or rehired after 1/1/06* and the 401(k) Savings Plan Company Match.

e. If the answer to Item 3.d. above is affirmative, state which employee classes are participating, i.e., Executive, Exempt, Non-Exempt, Union, Wage, etc., and the number of employees participating.

f. If the answer to Item 3.d. above is affirmative, provide the total amount and sub-total amounts by employee grouping that were paid by KU/LG&E under the 401(k) Savings Plan Company Match for those identified employees.



Talina R. Mathews
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **MAY 02 2017**

cc: All parties

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

*Andrea C Brown
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KENTUCKY 40507

*Cheryl Winn
Waters Law Group, PLLC
12802 Townepark Way, Suite 200
Louisville, KENTUCKY 40243

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Honorable Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Honorable David J. Barberie
Managing Attorney
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KENTUCKY 40507

*Janice Theriot
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KENTUCKY 40202

*Honorable Iris G Skidmore
415 W. Main Street
Suite 2
Frankfort, KENTUCKY 40601

*Don C A Parker
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Honorable Kurt J Boehm
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Barry Alan Naum
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Gregory T Dutton
Goldberg Simpson LLC
9301 Dayflower Street
Louisville, KENTUCKY 40059

*Honorable Kendrick R Riggs
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KENTUCKY 40202-2828

*Casey Roberts
Sierra Club
1536 Wynkoop St., Suite 312
Denver, COLORADO 80202

*Gardner F Gillespie
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Carrie M Harris
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Lawrence W Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Joe F Childers
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, KENTUCKY 40507

*Janet M Graham
Commissioner of Law
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KENTUCKY 40507

*Laura Milam Ross
Kentucky League of Cities
101 East Vine Street
Suite 800
Lexington, KENTUCKY 40507

*Laurence J Zielke
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KENTUCKY 40202

*Honorable Robert C Moore
Attorney At Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Matthew Miller
Sierra Club
50 F Street, NW, Eighth Floor
Washington, DISTRICT OF COLUMBIA 20001

*Robert Conroy
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Megan Grant
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Mark E Heath
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WEST VIRGINIA 25301

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Paul Werner
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Rebecca W Goodman
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204