

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR AN)	
ADJUSTMENT OF ITS ELECTRIC AND GAS)	
RATES, A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY TO)	CASE NO.
DEPLOY ADVANCED METERING)	2020-00350
INFRASTRUCTURE, APPROVAL OF)	
CERTAIN REGULATORY AND ACCOUNTING)	
TREATMENTS, AND ESTABLISHMENT OF A)	
ONE-YEAR SURCREDIT)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company (LG&E), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due February 19, 2021. The Commission directs LG&E to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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.

LG&E shall make timely amendment to any prior response if LG&E obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which LG&E fails or refuses to furnish all or part of the requested information, LG&E 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, 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 Tab 4 of the Application, the Availability requirements on P.S.C. No. 13, Original Sheet No. 10, General Service (Rate GS), and the Availability requirements on P.S.C. No. 13, Original Sheet No. 15, Power Service (Rate PS).

a. Explain the rationale for basing eligibility for these rate schedules on 12-month average monthly loads.

b. Explain why a customer whose 12-month average monthly load is 49 kW should not be able to choose to be on Rate PS but a customer with a 12-month average monthly load of 51 kW can be on Rate PS, keeping in mind that there would be no material cost of service difference between the two customers.

2. Refer to Tab 4 of the Application, P.S.C. No. 13, Original Sheet No. 101.3, Resale of Electric Energy. Regarding the language allowing a customer to allocate LG&E's billing to customer to any other person, firm, or corporation provided the sum of such allocations does not exceed LG&E's billing, explain under what circumstances this provision is used and whether LG&E monitors the allocations. If LG&E does not monitor the allocations, given the Commission's recent denial of similar language in Case No. 2018-00261,² explain why this language should remain in the tariff.

3. Refer to the Direct Testimony of Lonnie E. Bellar (Bellar Testimony), page 56.

a. State whether LG&E anticipates a need for additional data storage capability for data gathered as a part of the implementation of AMI metering.

b. If so, state whether LG&E has included any additional costs for external or in-house expanded data storage in the cost of AMI implementation and provide a detailed breakdown of anticipated data storage costs.

² Case No. 2018-00261, *Electronic Application of Duke Energy Kentucky, Inc. for Authority to 1) Adjust Natural Gas Rates 2) Approval of a Decoupling Mechanism 3) Approval of New Tariffs 4) and for All Other Required Approvals, Waivers, and Relief* (Ky. PSC Mar. 27, 2019), Order at 16–17.

4. Refer to the Bellar Testimony, Exhibit LEB-2, page 9. Explain whether the reserve margin of 17.7–18.5 percent for 2018-2035 is within LG&E’s target reserve margin range.

5. Refer to the Bellar Testimony, Exhibit LEB-2, page 16. Explain why LG&E evaluated only one generation resource type for replacement capacity. Provide any analysis or workpapers that support this decision.

6. Refer to the Direct Testimony of Eileen L. Saunders, page 41, lines 13–15, which discusses that four total direct current fast charging (DCFC) stations would be installed if matching funds from the Environment Mitigation Trust were not received. Also, refer to LG&E’s response to Commission Staff’s Second Request for Information (Staff’s Second Request), Item 59, which indicates that all four DCFC stations would be located in LG&E’s service territory if matching funding from the Environment Mitigation Trust was not received. Finally, refer to KU’s response to Staff’s Second Request, Item 53, in Case No. 2020-00349,³ which indicates that all four DCFC stations would be located in KU’s service territory if matching funding from the Environment Mitigation Trust was not received. Indicate the number of DCFC stations that will be installed in each company’s territory if matching funding is received and if matching funding is not received.

7. Refer to the Direct Testimony of Robert M. Conroy, page 23, lines 7–10, which states that Rider NMS-1 will serve eligible electric generating facilities for which customers have submitted an application for net metering service before the effective date of rates established in this proceeding. Also refer to LG&E’s response to Kentucky

³ Case No. 2020-00349, *Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit* (Application Filed November 25, 2020).

Solar Industries Association, Inc.'s First Request for Information, Item 4(c), which indicates that a net metering customer's eligible generating facilities must be in service before the Commission approves Rider NMS-2 in order to take service under Rider NMS-1. Explain whether a potential net metering customer must have submitted its application for net metering before the effective date of rates approved in this proceeding to take service under Rider NMS-1 or whether their eligible generating facility must be in service before the effective date of rates approved in this proceeding to take service under Rider NMS-1.

8. Refer to the Direct Testimony of Robert M. Conroy, page 30, line 11 through page 34, line 7, regarding Rate GS and Rate PS legacy customers.

a. Explain the advantages and disadvantages to a Rate PS legacy customer of staying on Rate PS if they no longer meet the eligibility requirements of Rate PS.

b. Explain the advantages and disadvantages to a Rate GS legacy customer of staying on Rate GS if they no longer meet the eligibility requirements of Rate GS.

9. Refer to the Direct Testimony of William Steven Seelye, Exhibit WSS-19, Cost Support for Miscellaneous Charges. Explain whether any of the services included in Exhibit WSS-19 are performed after hours. If so, explain how those services are billed.

10. Refer to LG&E's response to Commission Staff's First Request for Information (Staff's First Request), Item 54. Also refer to LG&E's response to Staff's Second Request, Item 151(b). Provide a breakdown of each charge included in the other service charge column of both the Electric and Gas Summary of Nonrecurring Charges,

including the type of charge, amount billed, amount recovered, and number of times the charge was assessed.

11. Refer to the Attachment to LG&E's response to Staff's First Request, Item 55.

a. For each amount in the Summary of Non-Recurring Charges, explain in detail how they were determined.

b. For the other service charge column in the Electric Non-Recurring Charges Table, provide a breakdown of these amounts by type of charge.

c. Indicate whether the Electric Meter Pulse Charge is included in this table. If so, indicate in which column. If not, explain why not.

12. Refer to LG&E's response to Staff's First Request, Items 55(c) and 56, Attachment 19, 2020_Att_LG&E_LGE_PSC_1-56_Exhibit_WSS20_Increase_Decrease_in_Miscellaneous_Charges.xlsx.

a. Explain why Exhibit WSS-20 calculates the revenue impact of changes in non-recurring charges using the number of charges if the "basis for the non-recurring charge forecast is the general ledger, which does not include the number of charges..."

b. Given that the basis for the non-recurring charge forecast is the general ledger, explain how LG&E included the proposed changes in the non-recurring charges in the forecasted period.

13. Refer to LG&E's response to Staff's Second Request, Item 1(b), which indicates that Rate EVC-Fast will be updated annually. Explain the process to update Rate EVC-Fast annually, including how the update will be filed with the Commission.

14. Refer to LG&E's response to Staff's Second Request, Item 20. Provide the estimated date of LG&E's filing for accounting deviation with FERC.

15. Refer to LG&E's response to Staff's Second Request, Item 33. Explain whether LG&E considered including SEEM costs as part of the OSS tariff. Explain why or why not.

16. Refer to LG&E's response to Staff's Second Request, Item 37. Provide the number of customers who called in specifically for an AMI meter.

17. Refer to LG&E's response to Staff's Second Request, Item 57, which states that time spent by LG&E employees for HomeServe activities will be de minimus and thus included as part of regulated activities. Indicate whether LG&E expects the revenue from the aggregate total of its nonregulated incidental activities to exceed the lesser of 2 percent of the utility's total revenue or one million dollars (\$1,000,000) annually.

18. Refer to LG&E's response to Staff's Second Request, Item 61. Provide all wage and salary studies that LG&E relied upon in establishing its compensation and benefits package.

19. Refer to LG&E's response to Staff's Second Request, Item 102, which explains LG&E's proposal to revise the definition of hourly avoided energy cost in the Large Capacity Cogeneration and Small Power Production Qualifying Facilities Rider.

a. Provide an itemized list of the fixed and nonvariable fuel related costs that will be excluded under the new definition of hourly avoided energy cost.

b. Explain whether the items listed in response to a. above will also be excluded from the Small Capacity Cogeneration and Small Power Production Qualifying Facilities Rider (Rider SQF) credits the next time LG&E updates Rider SQF.

c. Identify/describe alternative methods of calculating avoided energy and capacity costs.

d. Explain why LG&E choose the method described above and not an alternative method.

20. Refer to LG&E's response to Staff's Second Request, Item 105(c). Provide a similar table by month.

21. Refer to LG&E's response to Staff's Second Request, Item 120.

a. Explain why local schools and parks have not opted for the outdoor sports lighting service (Rate OSL).

b. Explain if LG&E expects an increase of Rate OSL customers based upon the proposed decrease in Rate OSL rates.

22. Refer to LG&E's response to Staff's Second Request, Item 136, which provides cost justification for the disconnect/reconnect charge. Provide a detailed breakdown of the cost per disconnect or reconnect Order of \$16.11 by the following components: labor, transportation, supplies, equipment, and front and back office service order processing expenses.

23. Refer to LG&E's response to Staff's Second Request, Item 137, which provides support for the Electric Meter Test Fee.

a. Provide a detailed calculation showing how the IBEW Hourly Rate of \$41.12 was calculated.

b. Provide the portion of the IBEW Contract relating to the hourly rate.

c. Explain how the Burden Rate was calculated.

d. Explain how the amounts listed for “Light Duty Pickup”, “Medium & Heavy Duty Truck”, and “Van” under Transportation were calculated.

24. Refer to the Attachment to LG&E’s response to Staff’s Second Request, Item 140, which provides support for the Meter Pulse Electric Charge. Provide detailed support for the amounts listed as the following items: Pulse Relay, Pulse Initiator Board, Relay Enclosure, 5 Hours Labor (loaded), and Vehicle 2 hours.

25. Refer to LG&E’s response to Staff’s Second Request, Item 142, which provides support for the Electric Unauthorized Meter Reconnect Charge.

a. Provide detailed calculations showing how the amounts in the Avg Cost of Meter column were calculated.

b. For the 1/0 AMR row of the Average Cost of Meter Table, the response states that cell B19 is the most common; however, cell B19 is not listed for that row. It lists cells B8, B20, and B27. Indicate which cell is the most common.

c. The cell references in the 1/0 AMS and 3/0 Standard rows of the Average Cost of Meter Table are identical. Confirm whether the cell references are correct.

d. Provide a detailed calculation showing how the Field Services Labor Cost per Hour of \$35.00 was calculated.

e. Provide a detailed calculation showing how the Back Office Admin Labor Hourly Rate of \$22.40 was calculated.

f. Explain how the burden rate for Back Office Admin Labor was calculated.

26. Provide a complete and unredacted copy of LG&E’s vegetative plan.

27. Provide an analysis of income and average usage by census track. This can be accomplished by the following:

- a. For each customer, find the 5-year average usage by month.
- b. Go to the link below and input the address of each LG&E customer.

Enter this identifier on a spreadsheet with the information from (a) above. The program will output the census track associated with the customer's address.

<https://geocoding.geo.census.gov/geocoder/geographies/address?form>

- c. For each census tract, find the income associated on the census website.

- d. For each group of customers in each census track, calculate the five year average usage by month.

- e. Analyze and determine if there is a correlation between income and usage.

28. Provide any studies LG&E has conducted regarding usage of low-income customers.

29. Provide the number of net meter applications received by LG&E since public notice of this application was made.

30. Provide the number of applications for additional net metering facilities received by LG&E since public notice of this application was made.

31. Provide the percent of electric customers, by class that paid on time for each month in 2020. Customers paying on time means those customers who were not issued a termination notice.

32. Refer to LG&E's response to Metropolitan Housing Coalition, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society's First Request for Information, Item 36, which provides comparative data on the number of people who were behind on their bills and were at risk of being shut off between 2019 and 2020. Provide this same information broken down by customer class.

33. Refer to LG&E's response to Kentucky Solar Industries' Request for Information, Item 7.

a. Explain if LG&E has considered four part rates in the Solar Share Program.

b. Explain if LG&E considered altering the rate schedule to remove any subsidies.

34. Refer to LG&E's response to Kentucky Solar Industries' Request for Information, Item 14.

a. Explain how LG&E forecasts the number of net metering customers.

b. Explain if the forecast methodology changed under the proposed Net Metering II Tariff.

c. Explain if the forecasted number of solar installations changed under the proposed Net Metering II Tariff.

35. Refer to LG&E's response to the Department of Defense's Request for Information, Item 29. Explain why the sum of the production and transmission allocation factors differ between each cost of service study method.

36. Refer to LG&E's response to the Attorney General/KIUC's First Request for Information, Item 184. Explain why Mr. Seelye's LOLP method has not been adopted in any other proceeding except for LG&E and KU.

37. Refer to LG&E's response to the Attorney General/KIUC's First Request for Information, Item 188. The customer portion is the sum of the customer-related distribution expense and customer service expense. Explain why the distribution expense varies between each cost of service study.

38. For the following electric tariff sheets, explain in detail the justification and rationale for including language that seeks to limit LG&E liability:

- a. Original Sheet No. 30.3 – Fluctuating Load Service.
- b. Original Sheet No. 40.14 – Pole and Structure Attachment Charges, #12 Maintenance of Attachments and Structures & #13 National Joint Utilities Notification System.
- c. Original Sheet No. 40.15, Pole and Structure Attachment Charges, #15 Interference or Hazard.
- d. Original Sheet No. 40.19, Pole and Structure Attachment Charges, #21 Termination.
- e. Original Sheet No. 40.24, Pole and Structure Attachment Charges, #24 Performance Assurance.
- f. Original Sheet No. 40.25, Pole and Structure Attachment Charges, #29, Limitation of Liability.
- g. Original Sheet No. 42, Electric Vehicle Charging Service, Level 2.

- h. Original Sheet No. 42.1, Electric Vehicle Charging Service, Level 2, #3, #4, and #5 of Terms and Conditions.
- i. Original Sheet No. 43 – Electric Vehicle Fast Charging Service.
- j. Original Sheet No. 43.1 – Electric Vehicle Fast Charging Service, #3, #4, and #5 of Terms and Conditions.
- k. Original Sheet No. 97.2 – Customer Responsibilities – Liability.
- l. Original Sheet No. 98.1 – Company Responsibilities – Company Not Liable for Interruptions, Company Not Liable for Damage on Customer’s Property, and Liability.
- m. Original Sheet No. 101.2 – Billing.
- n. Original Sheet No. 107 – Energy Curtailment and Service Restoration Procedures – Purpose.
- o. Original Sheet No. 108.5 – Net Metering Service Interconnection Guideline, #10.

Gas Requests

39. Refer to Tab 4 of the Application, P.S.C. No. 13, Original Sheet No. 101.2, Resale of Gas. Regarding the language allowing a customer to allocate LG&E’s billing to customer to any other person, firm, or corporation provided the sum of such allocations does not exceed LG&E’s billing, explain under what circumstances this provision is used and whether LG&E monitors the allocations. If LG&E does not monitor the allocations, given the Commission’s recent denial of similar language in Case No. 2018-00261, explain why this language should remain in the tariff.

40. Refer to Bellar Testimony, pages 43–44. Confirm that expenses related compliance with Part 2 of the Safety of Gas Transmission Pipelines: Maximum Allowable Operating Pressure Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments are not include in the test year. If this cannot be confirmed, identify those expenses.

41. Refer to the Direct Testimony of William Steven Seelye, Exhibit WSS-19, page 7 of 18, Cost Justification for the Gas Inspection Charge/Additional Trip Charge. Also refer to LG&E’s response to Staff’s Second Request, Item 139, which provides support for LG&E’s Gas Inspection Charge/Additional Trip Charge.

a. Explain why the amount listed as vehicle cost in LG&E’s response to Staff’s Second Request (\$5.54) and the amount listed as vehicle cost in Exhibit WSS-19 (\$8.32) do not match.

b. Explain how the amount listed for “Van” under Transportation was calculated.

42. Refer to the Attachment to LG&E’s response to Staff’s First Request, Item 55. For the Inspection Charge/Meter Test column in the Gas Non-Recurring Charges table, provide a breakdown of these amounts by type of charge.

43. Refer to LG&E’s response to Staff’s Second Request, Item 108, which discusses revisions to the Firm Transportation Service Tariff regarding gas generators whose generation facilities are installed and operating 90 days after January 1, 2021. Indicate whether the date of January 1, 2021, will be revised to the date rates are approved in this proceeding.

44. Refer to LG&E's response to Staff's Second Request, Item 113, which discusses proposed revisions to the Gas Supply Clause.

a. Describe any circumstances in which LG&E foresees it would use vaporized liquefied petroleum gas and air and liquefied natural gas to supplement its gas supply.

b. Describe in what quantity liquefied petroleum gas and air and liquefied natural gas would be purchased in each circumstance described in a. above.

c. Provide the current price of liquefied petroleum gas and air and liquefied natural gas available to LG&E if it were to acquire it.

d. Explain the difference in usage for vaporized liquefied petroleum gas and air and liquefied natural gas from natural gas in its gaseous state.

e. Explain the difference in usage for vaporized liquefied petroleum gas and air and liquefied natural gas from natural gas in its gaseous state.

45. Refer to LG&E's response to Staff's Second Request, Item 138, which provides support for the Gas Meter Test Fee.

a. Confirm that the only component of the Gas Meter Test Fee is labor. If confirmed, explain why no transportation expense is factored into the Gas Meter Test Fee. If not confirmed, indicate the other components in the Gas Meter Test Fee.

b. Provide a detailed calculation showing how the Labor Hourly Rate of \$26.28 was calculated.

46. Refer to the Attachment to LG&E's response to Staff's Second Request, Item 141, which provides support for the Meter Pulse Gas Charge.

a. Explain why the labor and vehicle amounts for the two different charges are not the same.

b. For both charges, provide detailed support for the amounts listed as the following items: Equipment Costs, 3 Hours Labor (loaded), and Vehicle.

47. Provide the percent of gas customers, by class that paid on time for each month in 2020. Customers paying on time means those customers who were not issued a termination notice.

48. For the following gas tariff sheets, explain in detail the justification and rationale for including language that seeks to limit LG&E liability:

a. Original Sheet No. 36.13 – Local Gas Delivery Service, #7 & #8 of Special Terms and Conditions.

b. Original Sheet No. 52.2 – Gas Meter Pulse Service, #5 & #6 of Special Terms and Conditions.

c. Original Sheet No. 97.2 – Customer Responsibilities, Liability.

d. Original Sheet No. 98.1 – Company Responsibilities, Company Not Liable for Interruptions, Company Not Liable for Damage on Customer's Premises, and Liability.



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DATED FEB 05 2021

cc: Parties of Record

Case No. 2020-00350

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