

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR AN ADJUSTMENT OF) CASE NO. 2012-00221
ITS ELECTRIC RATES)

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S FIRST REQUEST FOR INFORMATION
TO THE KENTUCKY UTILITIES COMPANY**

Comes now the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel and pursuant to the Public Service Commission's Scheduling Order of July 18, 2012, and submits its First Request for Information to the Kentucky Utilities Company ("KU") to be answered in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

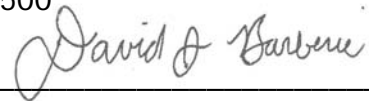
(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

WHEREFORE, the Lexington-Fayette Urban County Government submits this First Request for Information.

Respectfully submitted,

LEXINGTON-FAYETTE URBAN
COUNTY GOVERNMENT
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500

BY: _____

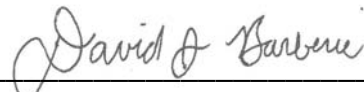


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NOTICE AND CERTIFICATION

Pursuant to the Commission's June 22, 2012 Order of Procedure, the Lexington-Fayette Urban County Government undersigned counsel certifies that: (a) the electronically filed documents are a true and accurate copy of each paper document which has been mailed on this date for filing with the Commission, (b) the electronic version of the filing has been transmitted to the Commission, (c) because no party has been excused from participating electronically no paper copies were mailed, and (d) the parties of record have been served electronically.

BY: _____



David J. Barberie

INITIAL REQUESTS FOR INFORMATION

1. Are any of KU's proposed rate increases related to the transfer of control of the company to PPL Corporation?
2. Can KU's ratepayers expect any enhancement over the current existing level of service as a result of the proposed rate increase? If so, please provide a detailed response that includes the specific benefit or benefits to be provided to each particular customer rate class.
 - (a) More specifically, will the LFUCG obtain any additional benefit or benefits (level of maintenance or otherwise) as a result of the proposed increase? If so, please provide a detailed response that includes the specific benefit or benefits to be provided to each particular customer rate class.
3. What percentage of the proposed additional annual revenues is attributable to Fayette County customers?
4. How many additional customers (and of which particular customer rate class) does KU anticipate adding within Fayette County over the next 5 years? What is the anticipated level of additional revenue to KU as result of the addition of these customers?
5. Does the LFUCG's franchise fee apply to all tariffs for services provided in Fayette County? If not please identify each tariff for which the franchise fee does not apply.
6. Does KU derive any rental or other income related to the use of utility poles or other fixtures located within the public right-of-way? If so, please provide a detailed breakdown of the rents or other income attributable to these types of properties. If possible, further provide a breakdown within Fayette County, Kentucky.
 - a. Is this income considered revenue by KU?
7. Would KU be amenable to a new tariff for street lights used by public entities under which the franchise fee would not apply?
8. Would KU be amenable to allowing LFUCG to pay for the purchase and installation of Granville Accessories in order to exclude them from the monthly charge?
9. Would KU be amenable to a proposal from LFUCG as to newly installed street lights which would provide for either: (a) lights purchased, owned and

maintained by LFUCG, or (b) lights purchased and owned by LFUCG but maintained by KU?

10. Would KU be amenable to a proposal from LFUCG to acquire its existing street lights?

11. Please provide the number (quantity), rate type, type description, and location (by street address) of each street light located in Fayette County, Kentucky for which the LFUCG currently pays a monthly tariff.

12. What is the cost to KU (per unit) of obtaining each type of street light?

13. How many existing street lights are scheduled (or anticipated) to be replaced by KU in Fayette County over the next 5 years for which the LFUCG currently and/or in the future will pay a monthly tariff? Please provide the quantity of each type of light being removed and the quantity and type of light that will replace it.

14. Please explain in detail KU's current policies, procedures, practices, and/or guidelines for maintaining street lights in Fayette County and provide copies of the same.

(a) Does KU regularly inspect individual street lights or the collective street lighting in Fayette County? Do these inspections take place only upon the receipt by KU of a complaint regarding a particular street light?

(b) What is the average response time to replace a non-working street light in Fayette County?

(c) Does this information differ depending upon the type of street light? If so, please provide a detailed explanation.

15. Please describe in detail all maintenance that must be performed by KU on each type of street light to ensure that it operates properly and provide a list of each element of the required maintenance and its monthly cost.

16. Is KU able to ascertain, at any given time, the number of street lights in Fayette County that are actually in proper working order? If so, please provide a detailed explanation, and further explain:

(a) How many street lights (on average) are actually in proper working order at any given time;

(b) Whether the LFUCG is charged the monthly tariff rate for non-working street lights for the periods of time within which such street lights are non-operational or not working properly;

(c) The amount of time it takes (on average) to bring such street lights into working order; and

(d) Whether this information differs among different types of street lights. If so, please provide this information for each type of light.

17. How was KU's proposed monthly rate for each type of street light determined?

(a) Please describe in detail each element of the proposed monthly rate for each type of street light (fixed costs, energy costs, maintenance costs, etc.), including the percentage of the rate attributable to each element.

(b) Does the number of existing street lights influence the proposed monthly rate for each type of street light (e.g. is there any use of a weighted average cost)?

(c) Does this differ from the existing rate elements? If so, in what regard?

(d) What percentage of KU's proposed monthly rate for each type of street light is comprised of maintenance?

(e) What percentage of KU's proposed monthly rate for each type of street light is comprised of costs associated with acquiring or installing the street light? Please provide this information for each type of street light for which the LFUCG currently pays a monthly tariff.

18. Is it KU's position that environmental cost recovery charges should be applied to street lights on a revenue basis, given that non-fuel charges constitute the majority of monthly costs?

19. What depreciable life basis (if any) for each type of street light does KU utilize? Is this the standard industry basis?

20. Does the LFUCG continue to pay for KU's cost of installing or acquiring the street light beyond the depreciable life basis of the street light?

21. From the perspective of the proposed rate for each type of street light, does KU propose to treat the existing street lights in Fayette County any differently than those that will in the future be installed? If so, please provide a detailed explanation.

22. Is it KU's position that it could have actually justified seeking a greater rate increase for any type of street light for which the LFUCG currently pays a monthly tariff? If so, for which types of lighting? Please provide a detailed explanation of the basis for this position (for each different type of light) and provide any supporting documents or work papers.

23. Has KU compared or analyzed the proposed monthly rate for each type of street light to those charged by other utilities in jurisdictions of similar size to Lexington-Fayette County, Kentucky? If so, please identify each jurisdiction to which the rates were compared or analyzed and provide the monthly rate for each type of street light in those jurisdictions.

24. How many different types of customer rate classes does the LFUCG currently make payments to KU under? For each type of class, please provide the following information:

- (a) The type of customer rate class;
- (b) The number of LFUCG accounts in each such class;
- (c) The total amount paid by the LFUCG for each such class during the last 12 month period; and
- (d) The total net projected impact for each such class under the proposed rate increase.

25. For each separate LFUCG account please provide a detailed analysis showing the impact of the proposed rate versus the existing rate using the most recent 12 month actual usage and billing data. Please also provide a detailed explanation of the formula that was used to obtain this information.

26. Please explain how an existing General Service Rate or Power Service customer which exceeds the usage criteria in the tariff will know whether it is eligible to exercise its option to remain this type of customer. Will KU have a process available for these customers to be provided information regarding their account(s) in order to make a determination as to which type of rate they may wish to choose going forward?

27. What are KU's current policies, procedures, practices, and/or guidelines pertaining to the trimming and/or removal of street trees (and other trees effecting utility lines) in Fayette County that might potentially interfere with service?

28. How frequently (on an annual basis) does KU perform meter inspections?

(a) Of these inspections, how frequently (on average) does the customer bear the associated costs or expenses?

(b) Are the costs or expenses associated with meter inspections otherwise reflected in KU's overall costs or expenses such as maintenance and operations?

29. Does KU engage in non-regulated activities or in any way provide non-regulated service? If so, generally describe all such activities or services in detail and indicate the extent to which KU engages in or provides such activities or services.

(a) Do any KU employees spend any of their time engaged in such activities?

30. Does KU allow, in any way, the non-governmental utilization of public street lights in Fayette County?

(a) If so, please provide a detailed explanation of each different type of such utilization that occurs in Fayette County, the extent of each type of utilization, the names of any parties that have agreements with KU regarding such usage in Fayette County, the amount and type of compensation or consideration (monetary or otherwise) that KU typically receives for such usage, copies of any pertinent agreements for such usage, and the total amount of compensation that KU receives for such activities.

31. Does KU have a timeframe for offering electronic data interchange (EDI) billing, both invoice and receipt of payment, to its Major Account customers?

32. Would KU be amenable to modifying the Net Metering Service tariff such that the generation facility shall be limited to a maximum rated capacity of 30 kilowatts or as otherwise agreed between the utility and customer-generator?