

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**LEXINGTON-FAYETTE URBAN COUNTY  
GOVERNMENT'S SUPPLEMENTAL REQUESTS 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 Supplemental Requests 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.

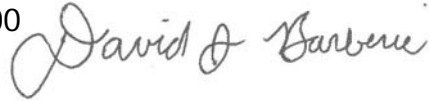
(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(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 Supplemental Requests for Information.

Respectfully submitted,

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

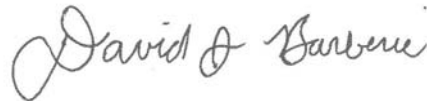


BY: \_\_\_\_\_

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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

## SUPPLEMENTAL REQUESTS FOR INFORMATION

1. Refer to your response to LFUCG's Initial Request for Information No. 4.
  - a. How much revenue has KU received from Fayette County customers for each of the last 5 years? If available, please provide this information broken out by each class of customer.
  - b. What percentage of KU's overall revenues for each of the last 5 years is the above?
2. Refer to your response to LFUCG's Initial Request for Information No. 6.
  - a. What is the amount of annual rental income that KU receives from third party attachments to its poles?
  - b. Are the majority of KU's poles located within the public right-of-way?
  - c. How is this revenue "credited"? Is the "credit" allocated to all classes of customers?
3. Refer to your response to LFUCG's Initial Request for Information No. 13.
  - a. How many public street lights (i.e., lights for which LFUCG pays a monthly tariff) were installed in Fayette County by KU in the last 5 years? Provide the information on an annual basis.
  - b. How many public street lights in Fayette County were replaced by KU in the last 5 years? Provide the information on an annual basis.
  - c. How many public street lights in Fayette County required a service or maintenance call in the last 5 years? Provide the information on an annual basis.
4. Refer to your response to LFUCG's Initial Request for Information No. 14.
  - a. How many street lights did KU maintain or repair in the last 5 years based upon the patrol program described in the response to subpart a.? Provide the information on an annual basis.
  - b. How many repair orders were generated in the last 5 years based upon the outage reporting program described in the response to subpart a.? Provide the information on an annual basis.

c. How many repair orders were generated in the last 5 years based upon the LexCall/311 reporting program described in the response to subpart a.? Provide the information on an annual basis.

5. Refer to your response to LFUCG's Initial Request for Information No. 16.

a. Does your response include private outdoor lights? Provide the average number of street lights and private outdoor lights repaired by KU in Fayette County for each of the last 5 years.

b. It is LFUCG's understanding, based upon monthly outage reports provided to it by KU, that in 2011 KU "repaired" 1044 street lights for which LFUCG paid a tariff. Please explain whether and how these monthly outage reports are consistent with your responses to RFI No. 16.

c. Do the operation and maintenance costs for lighting provided in your cost of service study include private outdoor lights? Provide a breakdown of the O&M costs between street lights and private outdoor lights.

6. Refer to your response to LFUCG's Initial Request for Information No. 19. Please explain the difference between the definition of the terms "average service life" and "average remaining life".

7. Refer to your response to LFUCG's Initial Request for Information No. 26. Can a customer who has been "grandfathered" into one of these rates be placed into another rate category without the consent of the customer?

8. Refer to your response to LFUCG's Initial Request for Information No. 30. LFUCG is interested in non-lighting uses (i.e., accessory uses of the street light poles or facilities) by third parties of public street lights for which LFUCG pays a tariff. Please answer the original question in the context of the above clarification.

9. Refer to your response to Commission Staff's Second Request for Information No. 6.

a. With respect to the LS terms and conditions, what is the basis for all repair work being done during regular working hours of the business?

b. With respect to the LS terms and conditions, please list all types of instances in which KU bills the customer for the cost of fixture replacement or repairs. Does this include automobile or other types of accidents? How does KU determine whether an act is willful?

i. Why should the customer bear the cost of damage to a light that it did not damage?

ii. How often has KU billed the customer under this tariff provision for each of the last 5 years.

c. With respect to the LS terms and conditions pertaining to street light installation after removal, please explain how the various term lengths were determined (i.e., 20 years and 5 years).

10. Refer to your response to Commission Staff's Second Request for Information No. 14. What is the relationship between a rate increase in this case and the DSM factor? Will the DSM factor increase if there is a rate increase in this case?

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