

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Requests for Information to Kentucky Utilities Company [hereinafter referred to as "KU"] to be answered by the date specified in the Commission's Order of Procedure, and 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 witness who will be prepared to answer questions concerning each request.
- (3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for KU with an electronic version of these questions, upon request.
- (4) 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.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If you believe any request appears confusing, please request clarification directly from Counsel for the Office of Attorney General.

(7) 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.

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

(9) 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 the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and

shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-

readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) 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.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please 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.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



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Notice of Electronic Filing, Filing, and Certificate of Service

With regard to the foregoing pleading, undersigned counsel provides the following certification and notice: Pursuant to ordering paragraph 3 of the Commission's June 22, 2012 Order, the Attorney General files the original and one copy in paper medium and one copy in electronic medium. Per ordering paragraph 10 of the June 22, 2012 Order, undersigned counsel certifies that: (a) the electronic version is a true and accurate copy of the material filed in paper medium; (b) the electronic version has been transmitted to the Commission; and (c) there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

With regard to the electronic filing, in conformity with Ordering paragraph 3 of the June 22, 2012 Order, the Attorney General has submitted his electronic copies of the information by uploading the material to the PSC's Web Application Portal at <https://psc.ky.gov/Security/account/login.aspx> . With regard to the original and paper copy, the material will be filed at the Commission's offices no later than the second business day following the electronic filing (consistent with the instruction contained in ordering paragraph 13 of the June 22, 2012 Order).

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The electronic filing took place on August 28, 2012 with the filing of the documents in paper medium at the Kentucky Public Service Commission scheduled for August 29, 2012.

this 28th day of August, 2012



Assistant Attorney General

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1. Please reference the company's response to AG 1 - 11. Please state the average number of times per customer that the bill due date has changed from one month to the next month during the test year. For example, will a customer's bill be due on the 15th on one month, the 10th on the next month, the 21st on the next month, etc.?
2. Please reference the company's response to AG 1 - 12. Answer the question by stating the most times that a customer's bill due date on a calendar from one month to the following month has changed since the 2008 KU rate case.
3. Please reference the company's response to AG 1 - 13. Based on the residential class as a whole, are the situations where the due date on the calendar is such from the mailing and receipt of the bill by the end user that he/she has less than three days to remit payment? If so, state the number of occasions and the number of effected customers.
4. Please reference the company's response to AG 1 - 15. Please define what the company means when it listed the number of complaints. Specifically, are these numbers reflective of complaints filed at the PSC or are they something else?
5. Please reference the company's response to AG 1 - 21. Explain in detail why the amount for the Black and Veatch costs went from \$71,390 for 2010 to \$364,598 for 2011.
6. Please reference the company's response to AG 1 - 22. Provide the revenues from the wholesale power market for the years 2005-2008 as referenced in the response.
7. Please reference the company's response to AG 1 - 51. Are the numbers listed in the table actual or projected? If actual, what is the basis for the assertion?
8. Please reference the company's response to AG 1 - 84a. Has the amount for the interest to be paid on customer deposit been changed in KRS 278.460? If so, what

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are the projected amounts which the company expects to pay over the next two years?

9. Please reference the company's response to AG 1 - 146. Has the company requested rate recovery for any of the costs identified in this answer? If so, please provide an explanation for the specific reason for including the cost(s).
10. Please reference the company's response to AG 1 - 147. Should the Attorney General interpret the following statement in the response to read that the company mistakenly included the dollar amounts in the response in the request in rates? "The charges to accounts 566 and 921, which total \$2,729, should have been charged to accounts below the line and would have decreased the revenue requirement in this case."
11. Please reference the company's response to AG 1 - 147(b). Are any of costs associated with the attached invoices included the company's requested rate increase? If so, explain in detail why.
12. Please reference the company's response to AG 1 - 153. Are any of the costs noted in the response included in the company's requested rate increase? If so, please explain why in detail for each and every such cost.
13. Please reference the company's response to AG 1 - 173. Are any of the costs noted in the response included in the company's requested rate increase? If so, please explain why in detail for each and every such cost.
14. Please reference the company's response to AG 1 - 178. Please describe in detail and provide the invoice for the December, 2008 entry of \$408,302.05 to Frost Brown Todd LLC.
15. Please reference the company's response to AG 1 - 189. Provide all operating expenses charged to KU and which are part of the requested rate increase, if any. Describe each in detail.

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16. Please reference the company's response to AG 1 - 206, at pages 6 and 7 of 13 of the attachment. What is the status of the wind project proposal discussed therein?
17. Please reference the company's response to AG 1 - 206, at pages 12 and 13 of 13 of the attachment. Please explain in detail the status of the "Doe Run Shale Gas Recovery Wells" proposal. In the explanation, state whether LG&E has mitigated the increased gas losses.
18. Please reference the Attorney General's Second Data Request to Louisville Gas & Electric Co. in Case No. 2012-00222. In particular, reference the Attorney General's question nos. 1, 6, 12, 15 and 16. With regard to each question, state the amount of each referenced employee's total compensation (in total dollar amounts) for which KU's ratepayers are being requested to pay.
19. RE: Company response to Attorney General Set I, Question 245. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 245. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set I, Question 245. In addition, please supplement with additional data and information as appropriate.
20. RE: Company response to Attorney General Set I, Question 247. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 247. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set

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- I, Question 247. In addition, please supplement with additional data and information as appropriate.
21. RE: Company response to Attorney General Set I, Question 258. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 258. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set I, Question 258. In addition, please supplement with additional data and information as appropriate. In this response, please provide a complete response including all reports, internal procedure manuals, sample data, methods for stratifying load characteristics, sample size by class, methods for extrapolating sample data to estimated population levels, etc.; i.e., provide the complete load study as originally requested.
22. RE: Company response to Attorney General Set I, Question 259. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 259. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set I, Question 259. In addition, please supplement with additional data and information as appropriate. In this response, please provide a complete response including all reports, internal procedure manuals, sample data, methods for stratifying load characteristics, sample size by class, methods for extrapolating sample data to estimated population levels, etc.; i.e., provide the complete load study as originally requested.

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23. RE: Company response to Attorney General Set I, Question 265. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 265. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set I, Question 265. In addition, please supplement with additional data and information as appropriate.
24. RE: Company response to Attorney General Set I, Question 266. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 266. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set I, Question 266. In addition, please supplement with additional data and information as appropriate.
25. RE: Company response to Attorney General Set I, Question 267. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 267. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set I, Question 267. In addition, please supplement with additional data and information as appropriate.

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26. RE: Company response to Attorney General Set I, Question 268. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 268. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set I, Question 268. In addition, please supplement with additional data and information as appropriate.
27. RE: Company response to Attorney General Set I, Question 269. The response references Staff 2-75 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-75 includes 30 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-75 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or tab the Company deems responsive to Attorney General Set I, Question 269. In this regard, please identify the specific file(s), tab(s) within each file, and range (location) of data and information requested in response to Attorney General Set I, Question 269. In addition, please supplement with additional data and information as appropriate.
28. As it relates to the Company's class cost of service study, it appears the Company has utilized a "meters" cost of \$62.00 per customer for lighting class customers. Please explain:
- (a) why lighting customers are assigned a cost for meters when this type of service is typically not metered?; and,
 - (b) please provide the basis and analysis for the assumption that a lighting meters cost of \$62.00 per customer is the same as that for traditional residential service.
29. Please provide all workpapers, analyses, and documentation supporting the Company's estimate of Services cost per customer by rate class as used in the Company's class cost of service study.

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30. With regard to the Company's class cost of service study as it relates to Services investment for the lighting classes, please explain and provide:
- (a) the basis for the assignment of Services cost to lighting classes when dedicated investment in lighting drops is typically booked to Account 373 (Street Lighting and Signal Systems); and,
 - (b) the basis for the same level of Services investment per customer for the lighting classes as for traditional residential service.
31. With regard to the Company's class cost of service study, please reconcile and explain the total cost of Overhead Conductors (Account 365) shown in page 2 of Conroy Exhibit C5 of \$158,902,799 with the total gross plant investment for Account 365 as utilized within KU's class cost of service study.
32. With regard to the Company's class cost of service study, please reconcile and explain the total cost of Underground Conductors (Account 367) shown in page 2 of Conroy Exhibit C6 of \$101,609,671 with the total gross plant investment for Account 367 as utilized within KU's class cost of service study.
33. With regard to the Company's class cost of service study, please reconcile and explain the total cost of Line Transformers (Account 368) shown in Conroy Exhibit C7 of \$203,773,079 with the total gross plant investment for Account 368 as utilized within KU's class cost of service study.