

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 INITIAL DATA REQUESTS  
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to Kentucky Industrial Utility Customers ["KIUC"] 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 KIUC 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-

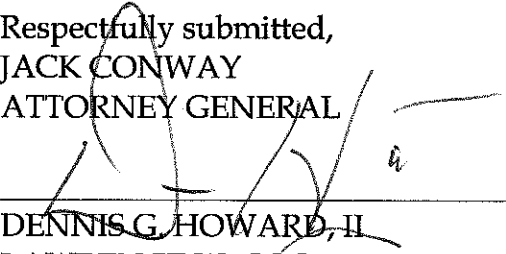
readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(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



---

DENNIS G. HOWARD, II  
LAWRENCE W. COOK  
ASSISTANT ATTORNEYS GENERAL  
1024 CAPITAL CENTER DRIVE  
SUITE 200  
FRANKFORT, KY 40601-8204  
(502) 696-5453  
FAX: (502) 573-8315  
[Dennis.Howard@ag.ky.gov](mailto:Dennis.Howard@ag.ky.gov)  
[Larry.Cook@ag.ky.gov](mailto:Larry.Cook@ag.ky.gov)  
[Matt.James@ag.ky.gov](mailto:Matt.James@ag.ky.gov)

**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).

Hon. David J. Barberie  
Hon. Jacob Walbourn  
Lexington-Fayette Urban County Government  
Department Of Law  
200 E. Main St.  
Lexington, KY 40507  
[dbarberi@lfucg.com](mailto:dbarberi@lfucg.com)

Hon. Iris G. Skidmore  
415 W. Main Street  
Ste. 2  
Frankfort, KY 40601  
[batesandskidmore@gmail.com](mailto:batesandskidmore@gmail.com)

Hon. Michael L. Kurtz  
Hon. Kurt J. Boehm  
Hon. Jody M. Kyler  
Boehm, Kurtz & Lowry  
36 E. 7th St.  
Ste. 1510  
Cincinnati, Ohio 45202  
[mkurtz@bkllawfirm.com](mailto:mkurtz@bkllawfirm.com)  
[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)  
[jkyler@bkllawfirm.com](mailto:jkyler@bkllawfirm.com)

Lonnie Bellar  
Robert M. Conroy  
Rick E. Lovekamp  
Hon. Allyson K. Sturgeon  
Kentucky Utilities Co.  
220 W. Main St.  
Louisville, KY 40232-2010  
[rick.lovekamp@lge-ku.com](mailto:rick.lovekamp@lge-ku.com)  
[robert.conroy@lge-ku.com](mailto:robert.conroy@lge-ku.com)  
[lonnie.bellar@lge-ku.com](mailto:lonnie.bellar@lge-ku.com)  
[Allyson.Sturgeon@lge-ku.com](mailto:Allyson.Sturgeon@lge-ku.com)

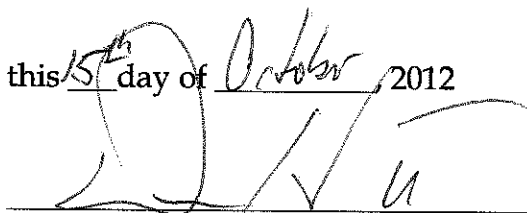
Hon. Kendrick R. Riggs  
Hon. W. Duncan Crosby III  
Barry L. Dunn  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W. Jefferson St.  
Louisville, KY 40202-2828  
[kendrick.riggs@skofirm.com](mailto:kendrick.riggs@skofirm.com)  
[duncan.crosby@skofirm.com](mailto:duncan.crosby@skofirm.com)  
[barry.dunn@skofirm.com](mailto:barry.dunn@skofirm.com)

Hon. Robert M Watt, III  
Hon. Lindsey W Ingram, III  
Hon. Monica Braun  
STOLL KEENON OGDEN PLLC  
300 W. Vine St.  
Ste. 2100  
Lexington, KY 40507-1801  
[L.Ingram@skofirm.com](mailto:L.Ingram@skofirm.com)  
[Robert.Watt@skofirm.com](mailto:Robert.Watt@skofirm.com)  
[Monica.Braun@skofirm.com](mailto:Monica.Braun@skofirm.com)

David C. Brown, Esq.  
Stites & Harbison, PLLC  
400 W. Market St., Suite 1800  
Louisville, KY 40202  
[dbrown@stites.com](mailto:dbrown@stites.com)

Matthew R. Malone, Esq.  
William H. May, III, Esq.  
Hurt, Crosbie & May PLLC  
127 W. Main St.  
Lexington, KY 40507  
[mmalone@hcm-law.com](mailto:mmalone@hcm-law.com)  
[bmay@hcm-law.com](mailto:bmay@hcm-law.com)

The electronic filing took place on October 15<sup>th</sup>, 2012 with the filing of the documents in paper medium at the Kentucky Public Service Commission scheduled for October 16<sup>th</sup>, 2012.

this 15<sup>th</sup> day of October, 2012  
  
Assistant Attorney General



Application of Kentucky Utilities Company  
for an Adjustment of Its Electric Rates  
Case No. 2012-00221  
Attorney General's Data Request to KIUC

1. Please state the name of the companies (clients) KIUC represents in the instant action.
2. Please provide the monthly costs, by customer charge and energy charge for each KIUC client, for each month of the historic test year used by LG&E in this proceeding.
3. Please provide the energy used by each client for each month of the historic test year used by KU in this proceeding.
4. Please provide the monthly costs that each client would have incurred for each of the historic months used in the application had KU used the rates proposed by each client.
5. Please provide for each client the test year the billing determinants (the number of bills, kWh, and billed kW). Please provide the information in electronic format whether Excel or otherwise with cells intact.
6. Please provide the time and date and level of maximum demand (kW) for each client during the test year. Please provide the information in electronic format whether Excel or otherwise with cells intact.