

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

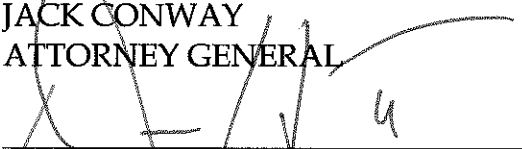
In the Matter of:

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

ATTORNEY GENERAL'S RESPONSES TO KENTUCKY UTILITIES COMPANY'S
REQUESTS FOR INFORMATION

Comes now the intervenor, the Attorney General of the Commonwealth of
Kentucky, by and through his Office of Rate Intervention, and submits his responses to
Kentucky Utilities Company's Requests for Information.

Respectfully submitted,
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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 October 24th, 2012 with the filing of the documents in paper medium at the Kentucky Public Service Commission scheduled for October 25th, 2012.

This 24th 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 Responses to Data Requests of Kentucky Utilities Company

WITNESS RESPONSIBLE:

Glenn Watkins

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QUESTION No. 1:

On page 11 of his testimony, Mr. Watkins states that the "BIP method is an accepted allocation approach."

- a. Please provide a list of the jurisdictions that have accepted the BIP method. If Mr. Watkins has not done an exhaustive survey, provide all jurisdictions he is aware of that have accepted the BIP method.
- b. Please provide the name of the utility, docket or case number, and commission order of all rate case proceedings in which a regulatory commission had adopted the BIP method.
- c. Please provide a copy of all testimony submitted by Mr. Watkins in other jurisdictions in which he either proposed or discussed the BIP method. Also, indicate whether the BIP method was adopted by the regulatory commission in the proceeding for which Mr. Watkins submitted testimony concerning the BIP method.

RESPONSE:

- a. Mr. Watkins is not aware of which jurisdictions have and/or have not accepted the BIP method.
- b. See (a) above.
- c. See attached testimonies of Mr. Watkins addressing the Base Intermediate Peak Method during the last five years:
 - i. Georgia Power Company (Georgia PSC Docket No. 25060-U);
 - ii. Puget Sound Energy (Washington UTC Docket No. UE-072300);
 - iii. Kentucky Utilities (Kentucky PSC Case No. 2008-00251);
 - iv. Louisville Gas & Electric (Kentucky PSC Case No. 2008-00252);

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- v. Puget Sound Energy (Washington UTC Docket No. UE-090704);
- vi. Duke Energy Carolinas (North Carolina PUC Docket No. E-7, Sub 909);
- vii. Georgia Power Company (Georgia PSC Docket No. 31958);
- viii. Kentucky Utilities (Kentucky PSC Case No. 2009-00548); and,
- ix. Louisville Gas & Electric (Kentucky PSC Case No. 2009-00549).

Each of the above cases settled with no acceptance or rejection of a particular class cost allocation study.

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WITNESS RESPONSIBLE:

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QUESTION No. 2:

Please provide all work-papers, source documents, and electronic spreadsheets utilized in the development of Mr. Watkins's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.

RESPONSE:

All work-papers, source documents, and electronic spreadsheets were previously provided to company's counsel and are now being provided as attachments to this question.

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WITNESS RESPONSIBLE:

Glenn Watkins

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QUESTION No. 3:

Please refer to page 47, lines 17-24 of Mr. Watkins's testimony.

- a. What concerns with the gas line program did the OAG advise Mr. Watkins?
- b. Provide all documents, e-mail, and correspondence related to what the OAG advised Mr. Watkins concerning the gas line tracker.

RESPONSE:

- a. The primary concerns relate to:
 - i. Single issue ratemaking;
 - ii. Automatic rate increases without full regulatory review and due process.
 - iii. The fact that the Company's proposed gas line replacement is nothing new or extraordinary.
- b. None.

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WITNESS RESPONSIBLE:

Dr. J. Randall Woolridge

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QUESTION No. 4:

Please provide all work-papers, source documents, and electronic spreadsheets utilized in the development of Dr. Woolridge's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.

RESPONSE:

All work-papers, source documents, and electronic spreadsheets utilized in the development of Dr. Woolridge's Direct Testimony were previously provided on the Woolridge CD to the company and are now being filed as attachments to this question.