

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC)
COMPANY FOR AN ADJUSTMENT OF ITS)
ELECTRIC AND GAS RATES, A CERTIFICATE) CASE No.
OF PUBLIC CONVENIENCE AND NECESSITY,) 2012-00222
APPROVAL OF OWNERSHIP OF GAS SERVICE LINES)
AND RISERS, AND A GAS LINE SURCHARGE)

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 Louisville Gas & Electric Co. [hereinafter referred to as "LG&E"] 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 LG&E 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
Larry.Cook@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. 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
kboehm@bkllawfirm.com
jkyler@bkllawfirm.com

Lonnie Bellar
Robert M. Conroy
Rick E. Lovekamp
Hon. Allyson K. Sturgeon
Kentucky Utilities Co.
220 W. Main Street
P.O. Box 32010
Louisville, KY 40232-2010
rick.lovekamp@lge-ku.com
robert.conroy@lge-ku.com
lonnie.bellar@lge-ku.com
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
duncan.crosby@skofirm.com
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
Robert.Watt@skofirm.com
Monica.Braun@skofirm.com

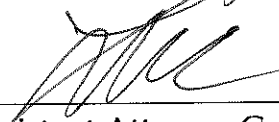
David C. Brown, Esq.
Stites & Harbison, PLLC
400 W. Market St., Suite 1800
Louisville, KY 40202
dbrown@stites.com

Lisa Kilkelly
Eileen Ordovery
LEGAL AID SOCIETY
416 W. Muhammad Ali Blvd.
Ste. 300
Louisville, Ky. 40202
LKilkelly@laslou.org
EOrdovery@laslou.org

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

The electronic filing took place on August 28th, 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

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

1. Please reference the company's response to AG 1 - 3. What is the amount that ratepayers are being requested for Mr. Staffieri's total compensation package in a total dollar amount?
2. Please reference the company's response to AG 1 - 13. 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.?
3. Please reference the company's response to AG 1 - 14. 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 LG&E rate case.
4. Please reference the company's responses to AG 1 - 15 and AG 1 - 16. 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.
5. Please reference the company's response to AG 1 - 17. 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?
6. Please reference the company's response to AG 1 - 19. What is the amount that ratepayers are being requested for Mr. Thompson's total compensation package in a total dollar amount?
7. Please reference the company's response to AG 1 - 25. Explain in detail why the amount for the Black and Veatch costs went from \$41,850 for 2010 to \$299,076 for 2011.
8. Please reference the company's response to AG 1 - 26. Provide the revenues from the wholesale power market for the years 2005-2008 as referenced in the response.

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

9. Please reference the company's response to AG 1 – 30. Please explain the methodology and reasoning behind the allocation of the CASCADE costs between KU (68%) and LG&E (32%).
10. Please reference the company's response to AG 1 – 31. Are the costs listed in the response part of the increase that the respective companies have requested in the instant applications?
11. Please reference the company's response to AG 1 – 32. Please explain in detail the specific benefits that the ratepayers receive from the company's contributions to EPRI.
12. Please reference the company's response to AG 1 – 36. What is the amount that ratepayers are being requested for Mr. Hermann's total compensation package in a total dollar amount?
13. Please reference the company's response to AG 1 – 48. Please provide a copy of the Department of Transportation Pipeline and Hazardous Materials Administration March advisory bulletin referenced in the response.
14. Please reference the company's response to AG 1 – 48. Please explain what criteria the company used to identify "all target customer service risers" noted in the response.
15. Please reference the company's response to AG 1 – 61. What is the amount that ratepayers are being requested for Mrs. Scott's total compensation package in a total dollar amount?
16. Please reference the company's response to AG 1 – 65. What is the amount that ratepayers are being requested for Mr. Charnas' total compensation package in a total dollar amount?
17. Please reference the company's response to AG 1 – 68. What is the amount that ratepayers are being requested for Mr. Arbough's total compensation in dollars?
18. Please reference the company's response to AG 1 – 73. What is the amount that ratepayers are being requested for Mr. Bellar's total compensation in dollars?

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

19. Please reference the company's response to AG 1 - 76. Please answer the question as to the basis for the decision.
20. Please reference the company's responses to AG 1 - 75 and 1-76. Please provide all internal studies, analyses or reports conducted by or for the company regarding a specific industrial or commercial customer which has threatened to by-pass the company's distribution system in the last three years.
21. Please reference the company's responses to AG 1 - 100. Explain in detail what and how (quantitatively) "other rate schedules" could be affected by Rider TS-2 and Rider PS-TS-2.
22. Please reference the company's responses to AG 1 - 189. 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.
23. Please reference the company's response to AG 1 - 190. 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, 580 and 921, which total \$1,921, should have been charged to accounts below the line and would have decreased the revenue requirement in this case."
24. Please reference the company's response to AG 1 - 190(b). Are any of costs associated with the attached invoices included in the company's requested rate increase? If so, explain in detail why.
25. Please reference the company's response to AG 1 - 194. Please explain in detail the means by which, and the people employed, to determine that \$187,306 was incorrectly included in Blake 1, Schedule 1.17.
26. Please reference the company's response to AG 1 - 210. 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.

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

27. Please reference the company's response to AG 1 - 216. 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.
28. Please reference the company's response to AG 1 - 217. 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.
29. Please reference the company's response to AG 1 - 227 regarding General Office Expense. 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.
30. Please reference the company's response to AG 1 - 129. Please explain in detail the means by which, and the people employed, to determine that \$17,500 in fines were incorrectly included in the rate application.
31. Please reference the company's response to AG 1 - 232. Provide all affiliated operating expenses charged to LG&E which are part of the requested rate increase, if any. Describe each in detail.
32. Please reference the company's response to AG 1 - 249, at pages 6 and 7 of 13 of the attachment. What is the status of the wind project proposal discussed therein. Please reference the company's response to AG 1 - 249, 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.
33. RE: Company response to Attorney General Set I, Question 288. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 encompass not only Mr. Conroy's exhibits but also some (or all) of his workpapers. However, it cannot be determined which file and/or

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

tab the Company deems responsive to Attorney General Set I, Question 288. 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 288. In addition, please supplement with additional data and information as appropriate.

34. RE: Company response to Attorney General Set I, Question 290. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 290. 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 290. In addition, please supplement with additional data and information as appropriate.
35. RE: Company response to Attorney General Set I, Question 301. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 301. 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 301. 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.
36. RE: Company response to Attorney General Set I, Question 302. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 encompass not only Mr. Conroy's exhibits but also some

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

(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 302. 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 302. 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.

37. RE: Company response to Attorney General Set I, Question 307. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 307. 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 307. In addition, please supplement with additional data and information as appropriate.
38. RE: Company response to Attorney General Set I, Question 308 (a), (c), and (g). The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 308 (a), (c), and (g). 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 308 (a), (c), and (g). In addition, please supplement with additional data and information as appropriate.
39. RE: Company response to Attorney General Set I, Question 309. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format.

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 309. 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 309. In addition, please supplement with additional data and information as appropriate.

40. RE: Company response to Attorney General Set I, Question 310. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 310. 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 310. In addition, please supplement with additional data and information as appropriate.
41. RE: Company response to Attorney General Set I, Question 311. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 311. 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 311. In addition, please supplement with additional data and information as appropriate.
42. RE: Company response to Attorney General Set I, Question 312. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 encompass not only Mr. Conroy's exhibits but also some

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

(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 312. 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 312. In addition, please supplement with additional data and information as appropriate.

43. RE: Company response to Attorney General Set I, Question 313. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 313. 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 313. In addition, please supplement with additional data and information as appropriate.
44. RE: Company response to Attorney General Set I, Question 324. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 324. 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 324. In addition, please supplement with additional data and information as appropriate.
45. RE: Company response to Attorney General Set I, Question 326. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 326. In this regard, please identify the specific file(s), tab(s) within each file, and range

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

(location) of data and information requested in response to Attorney General Set I, Question 326. In addition, please supplement with additional data and information as appropriate.

46. RE: Company response to Attorney General Set I, Question 327. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 327. 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 327. In addition, please supplement with additional data and information as appropriate.
47. RE: Company response to Attorney General Set I, Question 328. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 328. 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 328. In addition, please supplement with additional data and information as appropriate.
48. RE: Company response to Attorney General Set I, Question 329. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 329. 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 329. In addition, please supplement with additional data and information as appropriate.

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

49. RE: Company response to Attorney General Set I, Question 331 (a). The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 331 (a). 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 331 (a). In addition, please supplement with additional data and information as appropriate.
50. RE: Company response to Attorney General Set I, Question 332. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 332. 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 332. In addition, please supplement with additional data and information as appropriate.
51. RE: Company response to Attorney General Set I, Question 334 (b). The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 334 (b). 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 334 (b). In addition, please supplement with additional data and information as appropriate.

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

52. RE: Company response to Attorney General Set I, Question 335. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 335. 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 335. In addition, please supplement with additional data and information as appropriate.
53. RE: Company response to Attorney General Set I, Question 336. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 336. 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 336. In addition, please supplement with additional data and information as appropriate.
54. RE: Company response to Attorney General Set I, Question 343. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 343. 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 343. In addition, please supplement with additional data and information as appropriate.
55. RE: Company response to Attorney General Set I, Question 344. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 344. 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 344. In addition, please supplement with additional data and information as appropriate.

56. RE: Company response to Attorney General Set I, Question 345. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 345. 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 345. In addition, please supplement with additional data and information as appropriate.
57. RE: Company response to Attorney General Set I, Question 347. The response references Staff 2-108 which requested Mr. Conroy's exhibits in electronic format. The Company's response to Staff 2-108 includes 44 individual Excel files, many of which include a multitude of tabs and various analyses. It appears that the responses to Staff 2-108 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 347. 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 347. In addition, please supplement with additional data and information as appropriate.
58. RE: Company response to Attorney General Set I, Question 323 (c). The response is not responsive. Please provide the requested data.
59. RE: Company response to Attorney General Set I, Question 331 (d). The response is not responsive. The Attorney General and its consultants have entered into a Protective Agreement with the Company and the information will

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

be treated as confidential unless the PSC determines otherwise. Furthermore, the location of a specific customer relative to the Company's distribution system cannot be viewed as a matter of national or state security. Please provide the requested map or schematic showing the location of each customer requested along with relevant LG&E distribution (or transmission) mains as well as interstate pipelines in the vicinity of each customer. The Attorney General is not requesting materials that would identify every detail of the distribution system. Rather, the Attorney General needs the proximity of the customer(s) relative to the entire system in an illustrative manner showing the size of the mains and the transmission pipelines in the immediate vicinity.

60. With regard to electric service, please provide the current (or end of test year) number of customers by rate schedule for each zip code within LG&E's electric service area. Please provide in Microsoft Excel or Access if possible, otherwise, please provide in ASCII electronic format.
61. With regard to natural gas service, please provide the current (or end of test year) number of customers by rate schedule for each zip code within LG&E's natural gas service area. Please provide in Microsoft Excel or Access if possible, otherwise, please provide in ASCII electronic format.
62. With regard to the Company's electric class cost of service study, please reconcile and explain the total cost of Overhead Conductors (Account 365) shown in page 1 of Conroy Exhibit C4 of \$158,902,799 with the total gross plant investment for Account 365 as utilized within LG&E's electric class cost of service study.
63. With regard to the Company's electric class cost of service study, please reconcile and explain the total cost of Underground Conductors (Account 367) shown in page 1 of Conroy Exhibit C5 of \$101,609,671 with the total gross plant investment for Account 367 as utilized within LG&E's electric class cost of service study.
64. With regard to the Company's electric class cost of service study, please reconcile and explain the total cost of Line Transformers (Account 368) shown in page 1 of Conroy Exhibit C5 of \$35,572,121 with the total gross plant investment for Account 368 as utilized within LG&E's electric class cost of service study.
65. With regard to the Company's natural gas class cost of service study, please reconcile and explain the total cost of Distribution Mains (Account 376) shown in

Application of Louisville Gas & Electric Company for an
Adjustment of Its Electric and Gas Rates, a Certificate of Public Convenience and Necessity,
Approval of Ownership of Gas
Service Lines and Risers, and a Gas Line Surcharge
Case No. 2012-00222
Attorney General's Supplemental Requests for Information

page 2 of Conroy Exhibit C9 of \$272,145,404 with the total gross plant investment
for Account 376 as utilized within LG&E's natural gas class cost of service study.