

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)	CASE NO. 2012-00222
CERTIFICATE OF PUBLIC CONVENIENCE AND)	
NECESSITY, APPROVAL OF OWNERSHIP OF)	
GAS SERVICE LINES AND RISERS, AND A GAS)	
LINE SURCHARGE)	

**DATA REQUESTS OF
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO THE ATTORNEY GENERAL**

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“AG”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on September 25, 2012.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, the AG, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if the AG receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If the AG objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground 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.

8. In the event any document requested has been destroyed or transferred beyond the control of the AG, its counsel, or its witnesses, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

Mr. Watkins


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.
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.
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.

Dr. Woolridge

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.

Dated: October 10, 2012

Respectfully submitted,

A handwritten signature in blue ink, reading "Kendrick R. Riggs", is written over a horizontal line. The signature is cursive and appears to be on a light-colored background.

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Counsel for Louisville Gas and Electric Company

CERTIFICATE OF COMPLIANCE

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that Louisville Gas and Electric Company's October 10, 2012 electronic filing of the Data Requests Propounded to the Attorney General is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on October 10, 2012; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and two copies in paper medium of the Data Requests are being mailed to the Commission on October 10, 2012.



Counsel for Louisville Gas and Electric Company