

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 KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to the Kentucky Industrial Utility Customers, Inc. (“KIUC”), 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, KIUC, 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 KIUC 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 KIUC 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 KIUC, 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. Baron

1. Provide a list of the regulatory proceedings in which Mr. Baron submitted testimony concerning interruptible or curtailable service rates.
2. Provide a copy of testimony submitted by Mr. Baron concerning interruptible or curtailable service rates in other jurisdictions.
3. In reference to page 11 of Mr. Baron's direct testimony, has Mr. Baron opposed the "curtailable credit offset methodology" used in the class cost of service studies in the prior rate case proceedings? If not, please explain why it is a specific problem in this proceeding.
4. Please refer to page 28 and 29 of Mr. Baron's testimony.
 - a. Is the adjustment based solely on the use of the August 2012 bill multiplied by 12 months?
 - b. At what point after the end of the test year did Carbide switch from Rate ITOD to Rate RTS?
 - c. Is it likely that other customers on the LG&E switched rates after the end of the test year?
5. Please provided a listing (date, case number, jurisdiction, client) of all testimony filed by Mr. Baron related to curtailable or interruptible service. For each such testimony, please provide a copy of the testimony.
6. Please provide all work-papers, source documents, and electronic spreadsheets utilized in the development of Mr. Baron's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.

Mr. Baudino

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

Mr. Goins

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

Mr. Kollen

9. Refer to Mr. Kollen's testimony beginning at page 14 through page 17. Did Mr. Kollen propose the same adjustment to storm damage expense and injuries and damages in prior rate case proceeding by the Companies which had test years ending September 30, 2003, April 30, 2008 and October 31, 2009? If not, please explain why not?
10. Please explain the apparent discrepancy between Mr. Baron's testimony concerning the adjustment for Carbide operations after the test year and Mr. Kollen's testimony related to his objection of the Off-system sales adjustment which he claims is a "post-test year" adjustment.
11. Please provide all quantitative support and evidence supporting Mr. Kollen's assertions at pages 22-23 of his testimony that Mr. Spanos "systematically biased" the survivor curves used to simulate the interim retirement history in his depreciation study.
12. Please provide all underlying calculations and work-papers supporting Mr. Kollen's short-term-debt calculation at page 37 of his Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.
13. Please provide all work-papers, source documents, and electronic spreadsheets utilized in the development of Mr. Kollen's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.

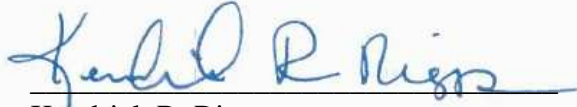
Mr. Majoros

14. Please refer to page 27 of Mr. Majoros's direct testimony.
 - a. Please provide the source of the definition of a regulatory liability presented by Mr. Majoros.
 - b. If the definition provided is Mr. Majoros's own, please provide all authoritative sources that support Mr. Majoros's definition of a regulatory liability.
15. Please refer to pages 28 through 29 of Mr. Majoros's testimony.
 - a. Please provide the section of the FERC uniform system of accounts from Mr. Majoros has cited the definitions of cost of removal and replacement.
 - b. Please provide the "Plant Instructions" section from the uniform system of accounts.
 - c. Please provide citations to all authorities on which Mr. Majoros bases his statement that "FERC's definition means that cost of removal incurred in connection with a replacement is a component of the replacement cost."

16. Refer to page 30 of Mr. Majoros's testimony. Please provide citations to all authorities or other support for the statement, "The only reason for dismantlement would be to replace the existing plants with new plants."
17. Please provide a list of all LG&E and KU facilities visited by Mr. Majoros. Please provide all photos and notes taken on these site visits.
18. Please provide the following:
 - a. All workpapers relied on by Mr. Majoros related to the development of life and net salvage estimates, remaining lives and depreciation rates. Please provide these in Excel-readable format; and
 - b. an electronic (Excel, if available) copy of each exhibit to Mr. Majoros's testimony.

Dated: October 10, 2012

Respectfully submitted,

A handwritten signature in blue ink, reading "Kendrick R. Riggs", is written over a horizontal line.

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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 Kentucky Industrial Utility Customers, Inc. 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.



Gerald R. Riggs
Counsel for Louisville Gas and Electric Company