

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

**RESPONSE OF HESS CORPORATION TO THE**  
**FIRST DATA REQUEST OF LOUISVILLE GAS AND ELECTRIC**

**LOUISVILLE GAS AND ELECTRIC**

**CASE NO. 2012-00222**

**Response of Hess Corporation to the  
First Data Request of Louisville Gas and Electric**

**Responding Witness: John Mehling**

Q1. Refer to page 9 of Mr. Mehling's testimony. Please produce all studies, analyses or information that Mr. Mehling performed or consulted regarding system reliability of natural gas LDCs in Kentucky in connection with his testimony at lines 7 – 10.

A1. Mr. Mehling relied on his extensive experience in the competitive natural gas business as detailed in Mr. Mehling's testimony, pages 2-3 and Exhibit 1. Mr. Mehling's testimony is grounded upon his extensive experience in the natural gas transportation industry and not on specific reports.

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Q2. Refer to page 10 of Mr. Mehling's testimony. Please produce all studies, analyses or information that Mr. Mehling performed or consulted regarding cost shifting to sales customers at natural gas LDCs in Kentucky in connection with his testimony at lines 14-17.

A2. Please refer to Hess Corporation's Response to Question No. 1.

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Q3. Please provide all work-papers, source documents, and electronic spreadsheets utilized in the development of Mr. Mehling's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.

A3. Besides LG&E's application, the only source documents Mr. Mehling relied upon in the preparation of his testimony were the Commission's 2010 order in Case No. 2010-00146 and other Kentucky LDCs' (including Atmos Energy, Columbia Gas of Kentucky, Delta Natural Gas, and Duke Kentucky) tariffs. All of these documents are publicly available.

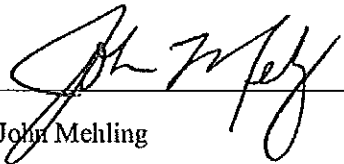
**VERIFICATION**

STATE OF INDIANA            )

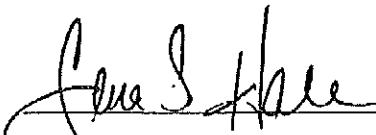
COUNTY OF MARION         )

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared, John Mehling, who, being by me first duly sworn deposed and said that:

He is appearing as a witness on the behalf of the Hess Corporation before the Kentucky Public Service Commission in an Application filed by Louisville Gas and Electric Company, and that he has personal knowledge of the matters set forth in responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
John Mehling

SWORN TO AND SUBSCRIBED BEFORE ME this  
13<sup>rd</sup> day of October, 2012

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

