

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)	

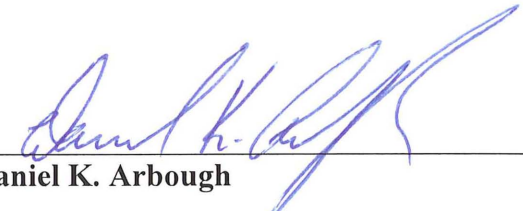
RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO THE
FIRST SET OF DATA REQUESTS OF
THE KROGER COMPANY
DATED JULY 31, 2012

FILED: AUGUST 14, 2012

VERIFICATION

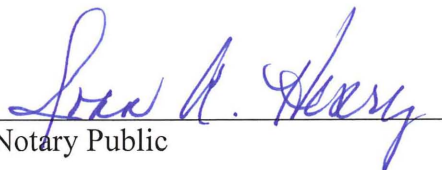
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Daniel K. Arbough**, being duly sworn, deposes and says that he is Treasurer for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the 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.



Daniel K. Arbough

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of August 2012.

 (SEAL)

Notary Public

My Commission Expires:
July 21, 2015

VERIFICATION

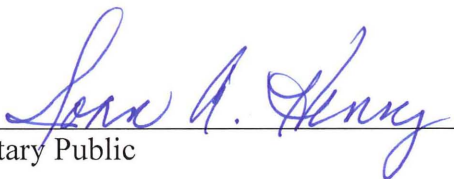
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the 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.



Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of August 2012.



Notary Public (SEAL)

My Commission Expires:

July 21, 2015

VERIFICATION

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF CUMBERLAND)

The undersigned, **John J. Spanos**, being duly sworn, deposes and says that he is the Senior Vice President, Valuation and Rate Division, for Gannett Fleming, Inc., that he has personal knowledge of the matters set forth in the 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 J. Spanos

JOHN J. SPANOS

Subscribed and sworn to before me, a Notary Public in and before said County and Commonwealth, this 6th day of August 2012.

Cheryl Ann Rutter (SEAL)

Notary Public

My Commission Expires:

February 20, 2015

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Cheryl Ann Rutter, Notary Public
East Pennsboro Twp., Cumberland County
My Commission Expires Feb. 20, 2015
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2012-00222

**Response to First Set of Data Requests of
The Kroger Company
Dated July 31, 2012**

Question No. 1

**Responding Witness: Kent W. Blake / Lonnie E. Bellar / Valerie L. Scott /
Robert M. Conroy / Shannon L. Charnas / John J. Spanos / Daniel K. Arbough**

Q-1. Please provide an electronic copy of all workpapers utilized in the preparation of the Company' direct testimony and exhibits of the witnesses listed below. In your response please include an electronic copy of rate design and cost of service models in Excel-compatible format with all working formulas included.

- (a) Kent Blake
- (b) Lonnie Bellar
- (c) Valerie Scott
- (d) Robert Conroy
- (e) Shannon Charnas
- (f) John Spanos
- (g) Dan Arbough

- A-1. (a) See response to KIUC 1-1 and the attached for Blake Exhibit 11.
- (b) See response to KIUC 1-1 and AG 1-360.
- (c) See response to KIUC 1-1.
- (d) See response to PSC 2-75.
- (e) See response to KIUC 1-1.
- (f) See attached.
- (g) Workpapers for Dan Arbough's testimony are provided in the responses to AG 1-222, AG 1-267, AG 1-268, and KIUC 1-1.

Blake Exhibit 11

Generation - Five Year (2007-2011)

Source: SNL

Holding Company	Power Prod. Non Fuel O&M Expense \$	Net Generation MWh	Power Prod. Non Fuel O&M \$/Net Gen	Ranking
Iberdrola, S.A.	60,879,000	59,590,703	1.02	1
OGE Energy Corp.	576,821,000	126,911,325	4.55	2
IDACORP, Inc.	405,963,000	73,494,668	5.52	3
Avista Corporation	219,241,000	35,960,033	6.10	4
LG&E and KU	1,054,943,000	170,762,010	6.18	5
Empire District Electric Company	119,807,000	19,221,332	6.23	6
Cleco Corporation	208,210,000	32,929,745	6.32	7
NextEra Energy, Inc.	3,126,412,000	491,430,766	6.36	8
NV Energy, Inc.	657,626,000	100,196,151	6.56	9
Berkshire Hathaway Inc.	2,898,046,000	434,296,237	6.67	10
Portland General Electric Company	364,717,000	54,141,509	6.74	11
Alliant Energy Corporation	623,147,000	92,267,589	6.75	12
Ameren Corporation	2,443,702,000	359,792,083	6.79	13
Otter Tail Corporation	127,307,000	18,537,120	6.87	14
TECO Energy, Inc.	654,821,000	91,604,808	7.15	15
SCANA Corporation	923,516,000	125,163,431	7.38	16
Exelon Corporation	43,262,000	5,817,440	7.44	17
Westar Energy, Inc.	1,069,751,000	141,918,034	7.54	18
AES Corporation	1,231,379,000	159,501,801	7.72	19
Great Plains Energy Inc.	1,006,378,000	129,138,919	7.79	20
CMS Energy Corporation	736,950,000	92,856,066	7.94	21
Integrus Energy Group, Inc.	383,791,000	48,355,482	7.94	22
Southern Company	7,265,974,000	890,580,864	8.16	23
ALLETE, Inc.	346,749,000	42,109,101	8.23	24
CH Energy Group, Inc.	3,483,000	408,866	8.52	25
Progress Energy, Inc.	4,027,191,000	464,104,933	8.68	26
MDU Resources Group, Inc.	103,825,000	11,956,596	8.68	27
Duke Energy Corporation	6,302,320,000	714,623,389	8.82	28
American Electric Power Company, Inc.	8,305,852,031	939,482,511	8.84	29
NorthWestern Corporation	142,858,000	15,807,836	9.04	30
Xcel Energy Inc.	3,504,397,000	374,525,347	9.36	31
DTE Energy Company	2,260,497,000	241,114,583	9.38	32
NiSource Inc.	720,612,000	74,743,508	9.64	33
Entergy Corporation	4,060,476,513	411,781,880	9.86	34
Dominion Resources, Inc.	3,176,868,000	308,003,798	10.31	35
Puget Holdings LLC	499,103,000	47,893,500	10.42	36
Black Hills Corporation	97,362,000	9,148,877	10.64	37
Wisconsin River Power Company	9,262,000	870,000	10.65	38
MGE Energy, Inc.	109,318,000	10,020,417	10.91	39
Vectren Corporation	329,052,000	27,951,012	11.77	40
El Paso Electric Company	541,881,000	41,112,295	13.18	41
National Grid plc	440,669,000	32,794,440	13.44	42
PG&E Corporation	2,064,738,000	147,892,973	13.96	43
Pinnacle West Capital Corporation	2,038,226,000	137,129,486	14.86	44
Edison International	2,721,299,000	158,645,509	17.15	45
Central Vermont Public Service Corporation	38,809,000	2,144,800	18.09	46
PNM Resources, Inc.	991,906,000	52,812,760	18.78	47
Alaska Electric Light and Power Company	10,346,000	529,906	19.52	48
Northeast Utilities	392,284,000	20,050,615	19.56	49
UniSource Energy Corporation	1,124,943,000	55,413,738	20.30	50
Cerberus Capital Management, L.P.	15,107,000	719,003	21.01	51
Gaz Métro Limited Partnership	22,109,000	1,007,109	21.95	52
Sempra Energy	732,415,000	32,115,727	22.81	53
Wisconsin Energy Corporation	2,558,546,000	108,931,404	23.49	54
FirstEnergy Corp.	2,257,257,000	73,225,624	30.83	55
Consolidated Edison, Inc.	679,403,000	14,232,814	47.73	56
Grand Total	76,831,806,544	8,327,772,473		

Transmission Five Year (2007-2011)

SNL

Holding Company Name	Transmission O&M		Regional Market O&M		Regional Transmission & Mkt		Total Cash		Transmission Miles	Metric	Ranking
	Expense	Expense	Transmission Plant: Add	Oper: Add	Costs	Costs					
Otter Tail Corporation	49,215,000	8,172,000	49,595,000		0	106,982,000	26,274	4,072	1		
MDU Resources Group, Inc.	39,900,000	2,317,000	46,770,000		0	88,987,000	15,235	5,841	2		
NorthWestern Corporation	142,469,000	0	110,650,000		0	253,119,000	40,548	6,242	3		
Empire District Electric Company	37,865,000	0	57,783,000		0	95,648,000	6,746	14,178	4		
El Paso Electric Company	83,942,000	0	57,832,000		0	141,774,000	8,795	16,120	5		
IDACORP, Inc.	123,935,000	0	292,450,000		0	416,385,000	23,705	17,565	6		
LKE	177,847,000	8,029,000	275,825,000		0	461,701,000	24,783	18,630	7		
NISource Inc.	87,127,000	123,000	190,460,000		0	277,710,000	14,367	19,330	8		
SCANA Corporation	83,359,000	0	256,701,000		0	340,060,000	17,083	19,906	9		
Cerberus Capital Management, L.P. (includes Consoli	4,589,000	0	1,495,000		0	6,084,000	305	19,948	10		
Duke Energy Corporation	653,463,000	60,922,000	934,440,000		0	1,648,825,000	80,154	20,571	11		
Great Plains Energy Inc.	269,231,000	16,901,000	157,503,000		2,236,000	445,871,000	20,474	21,777	12		
Mt. Carmel Public Utility Company	2,842,000	0	1,107,000		0	3,949,000	179	22,061	13		
American Electric Power Company	1,796,632,000	99,923,000	2,220,636,000		0	4,117,191,000	182,982	22,501	14		
Ameren Corporation	396,727,000	52,394,000	389,708,000		0	838,829,000	34,805	24,101	15		
Entergy Corporation	740,042,000	958,000	1,144,308,000		24,795,000	1,910,103,000	79,091	24,151	16		
Avista Corporation	127,805,000	0	149,600,000		0	277,405,000	11,010	25,196	17		
NV Energy, Inc.	147,795,000	0	371,556,000		0	519,351,000	19,776	26,262	18		
ITC Holdings Corp.	578,484,000	0	1,491,350,000		0	2,069,834,000	76,465	27,069	19		
PNM Resources, Inc.	368,207,000	0	221,106,000		0	589,313,000	20,487	28,765	20		
ALLETE, Inc.	144,979,000	283,000	202,437,000		0	347,699,000	12,011	28,948	21		
UNS Energy Corporation	124,761,000	0	248,825,000		0	373,586,000	12,668	29,491	22		
Pinnacle West Capital Corporation	274,619,000	0	624,101,000		0	898,720,000	29,119	30,864	23		
Iberdrola, S.A.	705,786,000	0	688,271,000		0	1,394,057,000	42,326	32,936	24		
Emera Incorporated	(59,914,000)	0	254,182,000		0	194,268,000	5,883	33,022	25		
CH Energy Group, Inc.	47,990,000	0	56,958,000		0	104,948,000	3,140	33,423	26		
OGE Energy Corp.	202,590,000	17,581,000	573,580,000		0	793,751,000	23,659	33,550	27		
Berkshire Hathaway Inc.	1,129,281,000	17,936,000	2,089,630,000		0	3,236,847,000	94,160	34,376	28		
Southern Company	1,019,305,000	0	2,132,549,000		0	3,151,854,000	89,676	35,147	29		
Cleco Corporation	81,741,000	0	143,324,000		0	225,065,000	6,281	35,833	30		
Progress Energy, Inc.	496,190,000	0	1,468,916,000		0	1,965,106,000	54,805	35,856	31		
PG&E Corporation	999,342,000	44,122,000	2,407,112,000		0	3,450,576,000	92,967	37,116	32		
AES Corporation	566,703,000	711,000	51,336,000		0	618,750,000	16,181	38,239	33		
Xcel Energy Inc.	1,531,873,000	75,538,000	1,906,364,000		0	3,513,775,000	90,367	38,883	34		
TECO Energy, Inc.	65,058,000	0	196,115,000		0	261,173,000	6,587	39,650	35		
FirstEnergy Corp.	3,373,648,000	16,889,000	853,123,000		0	4,243,660,000	104,223	40,717	36		
Wisconsin Energy Corp	405,925,000	0	1,506,774,000		0	1,912,699,000	46,878	40,802	37		
Pepco Holdings, Inc.	233,255,000	709,000	704,975,000		0	938,939,000	21,932	42,811	38		
NextEra Energy, Inc.	352,958,000	0	1,097,184,000		0	1,450,142,000	33,527	43,253	39		
Westar Energy, Inc.	660,714,000	0	635,941,000		0	1,296,655,000	29,964	43,274	40		
Alaska Energy & Resources Company	1,466,000	0	12,093,000		0	13,559,000	300	45,197	41		
Vectren Corporation	50,682,000	0	173,869,000		0	224,551,000	4,756	47,214	42		
Black Hills Corporation	85,654,000	0	50,222,000		0	135,876,000	2,807	48,406	43		
Central Vermont Public Service Corp	151,407,000	5,397,000	24,624,000		0	181,428,000	3,396	53,424	44		
PPL Electric Utilities*	736,336,000	11,822,000	335,221,000		0	1,083,379,000	20,234	53,543	45		
Texas Energy Future Holdings LP (formerly TXU)	2,162,170,000	0	1,893,407,000		0	4,055,577,000	75,350	53,823	46		
Edison International	1,295,135,000	60,249,000	2,039,607,000		0	3,394,991,000	61,342	55,345	47		
Dominion Resources, Inc.	477,615,000	23,311,000	2,116,938,000		0	2,617,864,000	30,819	84,943	48		
Portland General Electric Company	399,423,000	0	129,634,000		0	529,057,000	5,903	89,625	49		
Gaz Métro Limited Partnership	128,358,000	0	11,976,000		0	140,334,000	1,474	95,206	50		
Duquesne Light Holdings, Inc.	40,139,000	520,000	283,966,000		0	324,625,000	3,282	98,911	51		
CenterPoint Energy, Inc.	1,781,761,000	0	397,225,000		0	2,178,986,000	18,973	114,847	52		
Exelon Corporation	3,231,255,000	15,672,000	1,434,331,000		0	4,681,258,000	36,733	127,440	53		
Sempra Energy	475,813,000	14,853,000	738,331,000		0	1,228,997,000	9,585	128,221	54		
Puget Holdings LLC	426,176,000	0	160,546,000		0	586,722,000	4,349	134,910	55		
Public Service Enterprise Group	255,636,000	0	918,380,000		0	1,174,016,000	7,037	166,835	56		
Unitil Corporation	23,398,000	94,000	359,000		0	23,851,000	137	174,095	57		
National Grid plc	2,019,946,000	0	763,323,000		0	2,783,269,000	15,380	180,967	58		
Vermont Transco LLC	46,685,000	0	575,853,000		0	622,538,000	3,352	185,694	59		
Northeast Utilities	2,056,943,000	19,151,000	2,520,258,000		0	4,596,352,000	20,771	221,287	60		
Consolidated Edison, Inc.	873,441,000	40,885,000	1,281,849,000		0	2,196,175,000	5,519	397,930	61		
Grand Total	34,987,719,000	615,462,000	42,124,584,000		27,031,000	77,754,796,000	1,851,117				

Distribution Five Year Rankings (2007 - 2011) Source: SNL

Holding Company	Distribution O&M Expense	Distribution Plant: Additions	Total Cash Costs	Retail Electric Customers	Cash Costs \$/Customers	Ranking
Emera Incorporated	46,833,000	52,363,000	99,196,000	673,134	147.36	1
PNM Resources, Inc.	219,143,400	350,226,000	569,369,400	3,613,384	157.57	2
UGI Corporation	27,144,000	24,512,000	51,656,000	310,589	166.32	3
NextEra Energy, Inc.	1,344,604,000	2,634,510,000	3,979,114,000	22,572,785	176.28	4
Alaska Energy & Resources Company	9,835,000	4,577,000	14,412,000	79,910	180.35	5
Xcel Energy Inc.	1,204,635,000	1,878,632,000	3,083,267,000	16,882,915	182.63	6
Integrus Energy Group, Inc.	275,490,000	180,132,000	455,622,000	2,435,976	187.04	7
AES Corporation	341,171,000	594,296,000	935,467,000	4,912,550	190.42	8
FirstEnergy Corp.	2,270,511,000	3,723,381,000	5,993,892,000	30,211,727	198.40	9
NiSource Inc.	200,682,000	266,713,000	467,395,000	2,280,181	204.98	10
Iberdrola, S.A.	1,232,592,000	687,207,000	1,919,799,000	9,206,811	208.52	11
NV Energy, Inc.	239,719,000	999,328,000	1,239,047,000	5,924,156	209.15	12
MDU Resources Group, Inc.	55,502,000	72,755,000	128,257,000	612,511	209.40	13
Progress Energy, Inc.	1,290,610,000	1,949,419,000	3,240,029,000	15,401,577	210.37	14
CenterPoint Energy, Inc.	927,778,000	1,297,347,000	2,225,125,000	10,523,706	211.44	15
Northwestern Corporation	189,028,000	229,310,000	418,338,000	1,969,683	212.39	16
Texas Energy Future Holdings LP	1,037,045,000	2,293,809,000	3,330,854,000	15,673,899	212.51	17
TECO Energy, Inc.	231,562,000	480,261,000	711,823,000	3,347,157	212.66	18
El Paso Electric Company	96,953,000	293,149,000	390,102,000	1,833,970	212.71	19
Wisconsin Energy Corporation	430,317,000	766,282,000	1,196,599,000	5,572,433	214.74	20
Public Service Enterprise Group Inc	778,532,000	1,577,577,000	2,356,109,000	10,653,710	221.15	21
Duquesne Light Holdings, Inc.	156,815,000	501,444,000	658,259,000	2,934,479	224.32	22
UNS Energy Corporation	119,862,000	434,600,000	554,462,000	2,452,024	226.12	23
PPL Electric Utilities*	716,139,000	888,514,000	1,604,653,000	6,980,798	229.87	24
CMS Energy Corporation	756,599,000	1,338,929,000	2,095,528,000	8,966,307	233.71	25
Entergy Corporation	1,057,082,000	2,114,245,000	3,171,327,000	13,560,323	233.87	26
Duke Energy Corporation	1,644,805,000	3,034,851,000	4,679,656,000	19,850,779	235.74	27
LKE	390,950,000	718,564,000	1,109,514,000	4,677,853	237.18	28
National Grid plc	926,622,000	1,092,796,000	2,019,418,000	8,509,413	237.32	29
Westar Energy, Inc.	415,683,000	405,608,000	821,291,000	3,407,102	241.05	30
Puget Holdings LLC	382,109,000	909,974,000	1,292,083,000	5,347,063	241.64	31
Gaz Métro Limited Partnership	54,977,000	60,786,000	115,763,000	473,094	244.69	32
Great Plains Energy Inc.	385,353,000	698,283,000	1,083,636,000	4,360,477	248.51	33
DTE Energy Company	1,268,306,000	1,389,480,000	2,657,786,000	10,686,791	248.70	34
Dominion Resources, Inc.	1,017,651,000	2,001,856,000	3,019,507,000	12,013,280	251.35	35
Unitil Corporation	31,789,000	101,878,000	133,667,000	522,622	255.76	36
Portland General Electric Company	348,607,000	701,431,000	1,050,038,000	4,071,208	257.92	37
IDACORP, Inc.	227,963,000	400,658,000	628,621,000	2,434,041	258.26	38
Otter Tail Corporation	74,575,000	92,899,000	167,474,000	646,213	259.16	39
Cerberus Capital Management, L.P.	238,000	190,000	428,000	1,634	261.93	40
Exelon Corporation	3,475,542,000	5,473,716,000	8,949,258,000	32,996,711	271.22	41
Avista Corporation	131,084,000	348,916,000	480,000,000	1,769,512	271.26	42
CH Energy Group, Inc.	192,628,000	201,725,000	394,353,000	1,415,659	278.56	43
Northeast Utilities	1,648,569,000	2,661,774,000	4,310,343,000	15,280,807	282.08	44
Berkshire Hathaway Inc.	1,584,805,000	1,908,161,000	3,492,966,000	12,200,071	286.31	45
American Electric Power Company	2,550,533,000	3,655,967,000	6,206,500,000	21,369,853	290.43	46
MGE Energy, Inc.	63,093,000	140,445,000	203,538,000	699,178	291.11	47
Alliant Energy Corporation	249,361,000	1,180,715,000	1,430,076,000	4,908,391	291.35	48
ALLETE, Inc.	116,298,000	115,747,000	232,045,000	788,544	294.27	49
Sempra Energy	621,266,000	1,415,272,000	2,036,538,000	6,852,854	297.18	50
Southern Company	2,616,590,000	4,031,502,000	6,648,092,000	21,987,304	302.36	51
Edison International	2,073,778,000	5,421,345,000	7,495,123,000	24,393,795	307.26	52
SCANA Corporation	240,242,000	789,754,000	1,029,996,000	3,255,651	316.37	53
Pinnacle West Capital Corporation	471,614,000	1,282,994,000	1,754,608,000	5,532,559	317.14	54
Pepco Holdings, Inc.	1,026,076,000	1,871,653,000	2,897,729,000	9,098,984	318.47	55
PG&E Corporation	2,623,717,000	5,732,222,000	8,355,939,000	26,154,851	319.48	56
Vectren Corporation	73,686,000	160,758,000	234,444,000	731,133	320.66	57
Central Vermont Public Service Corp	172,208,000	85,407,000	257,615,000	795,073	324.01	58
Black Hills Corporation	40,628,000	132,137,000	172,765,000	532,491	324.45	59
Ameren Corporation	1,804,960,000	2,097,139,000	3,902,099,000	12,006,115	325.01	60
UIL Holdings Corporation	214,968,000	322,582,000	537,550,000	1,621,035	331.61	61
Cleco Corporation	130,703,000	329,607,000	460,310,000	1,386,010	332.11	62
OGE Energy Corp.	352,330,000	939,512,000	1,291,842,000	3,867,061	334.06	63
Empire District Electric Company	116,980,000	202,005,000	318,985,000	836,915	381.14	64
Mt. Carmel Public Utility Company	4,643,000	6,433,000	11,076,000	27,569	401.76	65
Consolidated Edison, Inc.	2,482,840,000	5,599,691,000	8,082,531,000	17,913,471	451.20	66
Grand Total	47,504,953,400	83,349,951,000	130,854,904,400	505,009,862		

Retail Five Year Rankings (2007-2011)

Source: SNL

Holding Company	Cust. Accounts Expenses \$	Cust. Svc & Inform Expenses \$	Sales Expenses \$	Retail O&M \$	Retail Customers	Retail O&M \$/Customers	Ranking
Texas Energy Future Holdings LP (formerly TXU)	178,610,000	228,881,000	475,000	407,966,000	15,673,899	26.03	1
CenterPoint Energy, Inc.	160,113,000	145,066,000	0	305,179,000	10,523,706	29.00	2
MDU Resources Group, Inc.	18,588,000	1,496,000	1,241,000	21,325,000	612,511	34.82	3
PNM Resources, Inc.	89,157,162	10,093,938	27,712,818	126,963,918	3,613,384	35.14	4
Dominion Resources, Inc.	366,019,000	56,342,000	0	422,361,000	12,013,280	35.16	5
Westar Energy, Inc.	121,844,000	17,498,000	29,000	139,371,000	3,407,102	40.91	6
Emera Incorporated	27,606,000	499,000	0	28,105,000	673,134	41.75	7
NISource Inc.	87,873,000	2,661,000	6,654,000	97,188,000	2,280,181	42.62	8
NorthWestern Corporation	52,532,000	29,315,000	2,128,000	83,975,000	1,969,683	42.63	9
Mt. Carmel Public Utility Company	1,291,000	16,000	(17,000)	1,290,000	27,569	46.79	10
Gaz Métro LP (Green Mountain Power)	17,929,000	5,026,000	28,000	22,983,000	473,094	48.58	11
El Paso Electric Company	85,435,000	3,671,000	0	89,106,000	1,833,970	48.59	12
Great Plains Energy Inc.	167,711,000	50,598,000	6,115,000	224,424,000	4,360,477	51.47	13
Black Hills Corporation	19,893,000	8,461,000	2,000	28,356,000	532,491	53.25	14
LKE	180,269,000	90,284,000	421,000	270,974,000	4,677,853	57.93	15
Duke Energy Corporation	923,313,000	217,797,000	14,615,000	1,155,725,000	19,850,779	58.22	16
Central Vermont Public Service Corp	38,342,000	7,939,000	12,000	46,293,000	795,073	58.22	17
NextEra Energy, Inc.	701,728,000	571,145,000	66,637,000	1,339,510,000	22,572,785	59.34	18
OGE Energy Corp.	136,153,000	72,193,000	21,309,000	229,655,000	3,867,061	59.39	19
Ameren Corporation	553,593,000	156,280,000	5,269,000	715,142,000	12,006,111	59.56	20
UGI Corporation	16,442,000	2,815,000	77,000	19,334,000	310,589	62.25	21
Duquesne Light Holdings, Inc.	129,827,000	58,033,000	0	187,860,000	2,934,479	64.02	22
Vectren Corporation	34,825,000	3,399,000	9,428,000	47,652,000	731,133	65.18	23
UNS Energy Corporation	115,571,000	46,022,000	0	161,593,000	2,452,024	65.90	24
CMS Energy Corporation	336,597,000	257,616,000	948,000	595,161,000	8,966,307	66.38	25
Progress Energy, Inc.	470,750,000	541,710,000	21,688,000	1,034,148,000	15,401,577	67.15	26
AES Corporation	296,386,000	36,919,000	25,000	333,330,000	4,912,550	67.85	27
Empire District Electric Company	48,959,000	7,455,000	1,831,000	58,245,000	836,915	69.59	28
American Electric Power	1,148,821,000	341,005,000	1,566,000	1,491,392,000	21,369,853	69.79	29
FirstEnergy Corp.	1,058,224,000	1,062,024,000	18,570,000	2,138,818,000	30,211,727	70.79	30
NV Energy, Inc.	281,709,000	140,173,000	2,927,000	424,809,000	5,924,156	71.71	31
Energy Corporation	772,831,142	152,415,915	49,774,273	975,021,330	13,560,323	71.90	32
Alaska Energy & Resources Company	5,704,000	99,000	0	5,803,000	79,910	72.62	33
SCANA Corporation	230,383,000	19,560,000	9,658,000	259,601,000	3,255,651	79.74	34
Portland General Electric Company	275,460,000	52,006,000	(2,000)	327,464,000	4,071,208	80.43	35
Consolidated Edison, Inc.	1,201,429,000	218,371,000	82,042,000	1,501,842,000	17,913,471	83.84	36
PPL Electric Utilities*	323,607,000	261,744,000	19,982,000	605,333,000	6,980,798	86.71	37
Exelon Corporation	2,333,508,000	545,789,000	5,645,000	2,884,942,000	32,996,711	87.43	38
Xcel Energy Inc.	645,724,000	867,537,000	7,299,000	1,520,560,000	16,882,915	90.07	39
TECO Energy, Inc.	145,333,000	152,628,000	7,328,000	305,289,000	3,347,157	91.21	40
Cleco Corporation	81,964,000	29,089,000	18,404,000	129,457,000	1,386,010	93.40	41
Integrus Energy Group, Inc.	104,192,000	126,888,000	52,000	231,132,000	2,435,976	94.88	42
Unitil Corporation	29,904,000	20,153,000	1,236,000	51,293,000	522,622	98.15	43
Iberdrola, S.A.	545,274,000	335,231,000	47,502,000	928,007,000	9,206,811	100.80	44
DTE Energy Company	747,227,000	333,582,000	8,773,000	1,089,582,000	10,686,791	101.96	45
Avista Corporation	66,499,000	112,387,000	2,851,000	181,737,000	1,769,512	102.70	46
Pinnacle West Capital Corporation	339,699,000	173,852,000	55,983,000	569,534,000	5,532,559	102.94	47
Berkshire Hathaway Inc.	610,458,000	625,820,000	28,897,000	1,265,175,000	12,200,071	103.70	48
MGE Energy, Inc.	34,622,000	38,329,000	990,000	73,941,000	699,178	105.75	49
Southern Company	1,470,537,000	552,110,000	305,409,000	2,328,056,000	21,987,304	105.88	50
Alliant Energy Corporation	155,551,000	366,947,000	6,000	522,504,000	4,908,391	106.45	51
Wisconsin Energy Corporation	330,469,000	261,574,000	1,513,000	593,556,000	5,572,433	106.52	52
Puget Holdings LLC	231,784,000	367,192,000	1,476,000	600,452,000	5,347,063	112.30	53
ALLETE, Inc.	34,470,000	54,753,000	931,000	90,154,000	788,544	114.33	54
Pepco Holdings, Inc.	902,031,000	141,070,000	9,758,000	1,052,859,000	9,098,984	115.71	55
IDACORP, Inc.	103,917,000	192,187,000	0	296,104,000	2,434,041	121.65	56
National Grid plc	506,677,000	565,741,000	2,720,000	1,075,138,000	8,509,413	126.35	57
Otter Tail Corporation	56,159,944	30,969,884	5,200,329	92,330,157	646,213	142.88	58
CH Energy Group, Inc.	84,547,000	115,974,000	2,266,000	202,787,000	1,415,659	143.25	59
Northeast Utilities	965,012,000	1,235,621,000	14,279,000	2,214,912,000	15,280,807	144.95	60
Sempra Energy	282,028,000	717,630,000	94,000	999,752,000	6,852,854	145.89	61
Edison International	1,052,308,000	2,762,000,000	73,185,000	3,887,493,000	24,393,795	159.36	62
Public Service Enterprise Group	1,086,669,000	722,446,000	11,723,000	1,820,838,000	10,653,710	170.91	63
PG&E Corporation	1,258,673,000	3,267,418,000	30,512,000	4,556,603,000	26,154,851	174.22	64
UIL Holdings Corporation	189,012,000	164,576,000	0	353,588,000	1,621,035	218.12	65
Cerberus Capital Mgt (Consolidated Water Power)	177,000	256,000	0	433,000	1,634	264.99	66
Grand Total	25,069,950,248	19,756,378,737	1,015,177,420	45,841,506,405	505,009,858		

A&G Five Year Rankings (2007-2011) Source: SNL

<u>Holding Company</u>	<u>A&G O&M Expense \$</u>	<u>Total Sales of Electricity (MWh)</u>	<u>A&G \$/MWh</u>	<u>Ranking</u>
Texas Energy Future Holdings LP (formerly TXU)	1,186,698,000	545,431,252	2.18	1
CenterPoint Energy, Inc.	849,644,000	382,553,878	2.22	2
American Electric Power Company	3,260,832,000	1,350,689,480	2.41	3
Berkshire Hathaway Inc.	1,244,662,000	498,972,380	2.49	4
FirstEnergy Corp.	2,266,506,000	833,438,044	2.72	5
NextEra Energy, Inc.	1,568,963,000	533,675,458	2.94	6
Puget Holdings LLC	454,056,000	133,396,816	3.40	7
LKE	786,328,000	203,328,871	3.87	8
PPL Electric Utilities*	746,621,000	191,755,127	3.89	9
Xcel Energy Inc.	2,271,222,000	571,522,218	3.97	10
OGE Energy Corp.	567,726,000	139,764,579	4.06	11
Southern Company	4,228,870,000	1,005,653,208	4.21	12
Entergy Corporation	3,071,759,000	728,446,073	4.22	13
Pepco Holdings, Inc.	1,129,467,000	266,941,475	4.23	14
Exelon Corporation	3,558,898,000	822,432,006	4.33	15
Public Service Enterprise Group Inc	1,029,966,000	237,938,830	4.33	16
Ameren Corporation	2,392,196,000	550,049,722	4.35	17
Cleco Corporation	235,733,000	52,752,183	4.47	18
Alliant Energy Corporation	756,233,000	163,165,465	4.63	19
ALLETE, Inc.	313,533,000	67,566,181	4.64	20
Avista Corporation	308,030,000	65,976,188	4.67	21
Otter Tail Corporation	169,420,000	36,232,299	4.68	22
Portland General Electric Company	635,797,000	127,668,348	4.98	23
Pinnacle West Capital Corporation	844,985,000	162,635,417	5.20	24
UNS Energy Corporation	419,377,000	80,685,081	5.20	25
SCANA Corporation	728,721,000	139,292,646	5.23	26
AES Corporation	892,023,000	166,285,253	5.36	27
Empire District Electric Company	157,330,000	28,592,970	5.50	28
Progress Energy, Inc.	2,786,972,000	506,198,380	5.51	29
CMS Energy Corporation	1,003,600,000	180,930,388	5.55	30
NorthWestern Corporation	280,885,000	49,740,320	5.65	31
Dominion Resources, Inc.	2,362,465,000	417,349,778	5.66	32
Vectren Corporation	180,900,000	31,953,789	5.66	33
TECO Energy, Inc.	567,372,000	98,172,005	5.78	34
Black Hills Corporation	145,901,000	25,040,375	5.83	35
Westar Energy, Inc.	881,357,000	147,325,365	5.98	36
Gaz Métro Limited Partnership (includes Green Mountain Power)	65,559,000	10,946,739	5.99	37
Integrus Energy Group, Inc.	510,654,000	84,747,411	6.03	38
Wisconsin Energy Corporation	966,640,000	159,369,413	6.07	39
Emera Incorporated	56,850,000	9,231,555	6.16	40
Duke Energy Corporation	4,994,025,000	807,415,517	6.19	41
Duquesne Light Holdings, Inc.	432,978,000	69,366,545	6.24	42
MDU Resources Group, Inc.	89,343,000	14,195,649	6.29	43
NV Energy, Inc.	1,013,013,000	158,402,913	6.40	44
PNM Resources, Inc.	719,218,000	107,763,657	6.67	45
IDACORP, Inc.	569,810,000	83,525,522	6.82	46
Wisconsin River Power Company	5,929,000	867,590	6.83	47
UGI Corporation	34,339,000	4,942,673	6.95	48
Iberdrola, S.A. (formerly Energy East Corp)	1,103,769,000	151,557,107	7.28	49
Unitil Corporation	65,476,000	8,958,686	7.31	50
Northeast Utilities	2,376,701,000	315,611,134	7.53	51
Great Plains Energy Inc.	1,157,772,000	150,468,380	7.69	52
NISource Inc.	681,695,000	85,276,634	7.99	53
DTE Energy Company	2,164,551,000	260,785,835	8.30	54
MGE Energy, Inc.	168,210,000	18,230,478	9.23	55
PG&E Corporation	4,137,305,000	437,095,396	9.47	56
El Paso Electric Company	524,708,000	54,014,961	9.71	57
Edison International	5,135,689,000	494,694,688	10.38	58
Alaska Energy & Resources Company	19,594,000	1,736,996	11.28	59
National Grid plc	1,484,788,000	124,074,213	11.97	60
Central Vermont Public Service Corp	194,133,000	14,968,443	12.97	61
UIL Holdings Corporation	457,391,000	29,436,236	15.54	62
Consolidated Edison, Inc.	4,420,582,000	268,479,112	16.47	63
Sempra Energy	1,535,193,000	81,891,375	18.75	64
CH Energy Group, Inc.	354,534,000	18,657,832	19.00	65
Mt. Carmel Public Utility Company	12,220,000	542,887	22.51	66
Grand Total	79,737,717,000	15,570,807,425		

2007 - 2011 Value Chain Pyramid Summary Source: SNL

	<u>Generation</u>	<u>Distribution</u>	<u>Retail</u>	<u>Transmission</u>	<u>A&G</u>	<u>Total</u>
LG&E and KU	1		1	1	1	4
Ameren Corporation	1			1	1	3
MDU Resources Group, Inc.		1	1	1		3
NextEra Energy, Inc.	1	1			1	3
NiSource Inc.		1	1	1		3
NorthWestern Corporation		1	1	1		3
American Electric Power Company				1	1	2
Berkshire Hathaway Inc.	1				1	2
Duke Energy Corporation			1	1		2
El Paso Electric Company			1	1		2
Empire District Electric Company	1			1		2
Entergy Corporation				1	1	2
FirstEnergy Corp.		1			1	2
Great Plains Energy Inc.			1	1		2
Iberdrola, S.A.	1	1				2
IDACORP, Inc.	1			1		2
NV Energy, Inc.	1	1				2
OGE Energy Corp.	1				1	2
Otter Tail Corporation	1			1		2
PNM Resources, Inc.		1	1			2
Xcel Energy Inc.		1			1	2
AES Corporation		1				1
Alaska Energy & Resources Company		1				1
Avista Corporation	1					1
Black Hills Corporation			1			1
Central Vermont Public Service Corp			1			1
Cleco Corporation	1					1
Dominion Resources, Inc.			1			1
Exelon Corporation					1	1
Gaz Métro Limited Partnership			1			1
Portland General Electric Company	1					1
Progress Energy, Inc.		1				1
Puget Holdings LLC					1	1
SCANA Corporation				1		1
Southern Company					1	1
Westar Energy, Inc.			1			1
ALLETE, Inc.						0
CH Energy Group, Inc.						0
Consolidated Edison, Inc.						0
Edison International						0
National Grid plc						0
Northeast Utilities						0
PG&E Corporation						0
Pinnacle West Capital Corporation						0
Sempra Energy						0
TECO Energy, Inc.						0
UNS Energy Corporation						0
Vectren Corporation						0
Wisconsin Energy Corp						0

Value Chain Components	# of Companies
	0
5	0
4	1
3	5
2	15
1	15
0	13
	<u>49</u>

No companies finished in the top quartile in all segments.
LKE (LG&E and KU) finished in the top quartile in 4 segments.
5 companies finished in the top quartile in 3 segments.
15 companies finished in the top quartile in 2 segments.
15 companies finished in the top quartile in 1 segment.
13 companies did not finish in the top quartile in any segments.

Notes:

- a) Ameren - moved up from 4 to 3 segments last year. Fell from 1Q to 2Q in retail. (3rd in 2Q)
b) PPL is not in the pyramid.

2007 - 2011 Value Chain Pyramid Detail

Source: SNL

	<u>Generation</u>	<u>Distribution</u>	<u>Retail</u>	<u>Transmission</u>	<u>A&G</u>	<u>Total</u>
1 AES Corporation	1	1	1	1	1	5
2 Alaska Energy & Resources Company	1	1	1	1	1	5
3 ALLETE, Inc.	1	1	1	1	1	5
4 Ameren Corporation	1	1	1	1	1	5
5 American Electric Power Company	1	1	1	1	1	5
6 Avista Corporation	1	1	1	1	1	5
7 Berkshire Hathaway Inc.	1	1	1	1	1	5
8 Black Hills Corporation	1	1	1	1	1	5
9 Central Vermont Public Service Corp	1	1	1	1	1	5
10 CH Energy Group, Inc.	1	1	1	1	1	5
11 Cleco Corporation	1	1	1	1	1	5
12 Consolidated Edison, Inc.	1	1	1	1	1	5
13 Dominion Resources, Inc.	1	1	1	1	1	5
14 Duke Energy Corporation	1	1	1	1	1	5
15 Edison International	1	1	1	1	1	5
16 El Paso Electric Company	1	1	1	1	1	5
17 Empire District Electric Company	1	1	1	1	1	5
18 Entergy Corporation	1	1	1	1	1	5
19 Exelon Corporation	1	1	1	1	1	5
20 FirstEnergy Corp.	1	1	1	1	1	5
21 Gaz Métro Limited Partnership	1	1	1	1	1	5
22 Great Plains Energy Inc.	1	1	1	1	1	5
23 Iberdrola, S.A.	1	1	1	1	1	5
24 IDACORP, Inc.	1	1	1	1	1	5
25 LKE	1	1	1	1	1	5
26 MDU Resources Group, Inc.	1	1	1	1	1	5
27 National Grid plc	1	1	1	1	1	5
28 NextEra Energy, Inc.	1	1	1	1	1	5
29 NiSource Inc.	1	1	1	1	1	5
30 Northeast Utilities	1	1	1	1	1	5
31 NorthWestern Corporation	1	1	1	1	1	5
32 NV Energy, Inc.	1	1	1	1	1	5
33 OGE Energy Corp.	1	1	1	1	1	5
34 Otter Tail Corporation	1	1	1	1	1	5
35 PG&E Corporation	1	1	1	1	1	5
36 Pinnacle West Capital Corporation	1	1	1	1	1	5
37 PNM Resources, Inc.	1	1	1	1	1	5
38 Portland General Electric Company	1	1	1	1	1	5
39 Progress Energy, Inc.	1	1	1	1	1	5
40 Puget Holdings LLC	1	1	1	1	1	5
41 SCANA Corporation	1	1	1	1	1	5
42 Sempra Energy	1	1	1	1	1	5
43 Southern Company	1	1	1	1	1	5
44 TECO Energy, Inc.	1	1	1	1	1	5
45 UNS Energy Corporation	1	1	1	1	1	5
46 Vectren Corporation	1	1	1	1	1	5
47 Westar Energy, Inc.	1	1	1	1	1	5
48 Wisconsin Energy Corp	1	1	1	1	1	5
49 Xcel Energy Inc.	1	1	1	1	1	5
50 Alliant Energy Corporation	1	1	1	1	1	4
51 CenterPoint Energy, Inc.	1	1	1	1	1	4
52 Cerberus Capital Management, L.P.	1	1	1	1	1	4
53 CMS Energy Corporation	1	1	1	1	1	4
54 DTE Energy Company	1	1	1	1	1	4
55 Duquesne Light Holdings, Inc.	1	1	1	1	1	4
56 Emera Incorporated	1	1	1	1	1	4
57 Integrys Energy Group, Inc.	1	1	1	1	1	4
58 MGE Energy, Inc.	1	1	1	1	1	4
59 Mt. Carmel Public Utility Company	1	1	1	1	1	4
60 Pepco Holdings, Inc.	1	1	1	1	1	4
61 PPL Electric Utilities*	1	1	1	1	1	4
62 Public Service Enterprise Group	1	1	1	1	1	4
63 Texas Energy Future Holdings LP	1	1	1	1	1	4
64 Unitil Corporation	1	1	1	1	1	4
65 UGI Corporation	1	1	1	1	1	3
66 UIL Holdings Corporation	1	1	1	1	1	3
67 Wisconsin River Power Company	1	1	1	1	1	2
68 ITC Holdings Corp.	1	1	1	1	1	1
69 Vermont Transco LLC	1	1	1	1	1	1
Total # of companies in each segment	56	66	66	61	66	

Value Chain Components	# of Companies
5	49
4	15
3	2
2	1
1	2
	<u>69</u>

49 companies participating in 5 segments
 15 companies participating in 4 segments
 2 companies participating in 3 segments
 1 company participating in 2 segments
 2 companies participating in 1 segment

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2012-00222

**Response to First Set of Data Requests of
The Kroger Company
Dated July 31, 2012**

Question No. 2

Responding Witness: Lonnie E. Bellar

- Q-2. Please refer to LG&E Witness Blake's Exhibit 1, Schedule 1.09. Please provide the Off-System Sales Margins by month for 2012 using the latest information available. Please provide this calculation in Excel format.
- A-2. See response to KIUC 1-38(a).

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2012-00222

**Response to First Set of Data Requests of
The Kroger Company
Dated July 31, 2012**

Question No. 3

Responding Witness: Lonnie E. Bellar

- Q-3. Please refer to LG&E Witness Blake's Exhibit 1, Schedule 1.09. Please provide the Off-System Sales Margins for the last five calendar years. Please provide this calculation in Excel format.
- A-3. See response to PSC 2-63(c).

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2012-00222

**Response to First Set of Data Requests of
The Kroger Company
Dated July 31, 2012**

Question No. 4

Responding Witness: Valerie L. Scott

- Q-4. Please refer to LG&E Witness Blake's Exhibit 1, Schedule 1.15. By including the test period (12 months ending March 2012) in the ten year average, does LG&E agree that it may have double weighted some storm damage expenses that are already included in the calendar year 2011 data? Please explain why the proposed averaging does not double count these expenses.
- A-4. Yes, the methodology used by LG&E to compute the 10 year average storm damage expense is a normalization adjustment that includes the nine months from April to December 2011 in both the 12 months ending December 2011 and the 12 months ending March 2012. This methodology is consistent with the approach approved by the Commission in its Orders in Case Nos. 2009-00549 and 2003-00433. LG&E also proposed a similar adjustment in Case No. 2008-00252, which was resolved by a settlement approved by the Commission.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2012-00222

**Response to First Set of Data Requests of
The Kroger Company
Dated July 31, 2012**

Question No. 5

Responding Witness: Valerie L. Scott

Q-5. Please refer to LG&E Witness Blake's Exhibit 1, Schedule 1.15. Please recalculate the ten year storm damage average expense using the ten years covering 2002 - 2011. Please provide this calculation in Excel format with formulas intact.

A-5. See attached.

The attachment is being provided in a separate file in Excel format.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2012-00222

**Response to First Set of Data Requests of
The Kroger Company
Dated July 31, 2012**

Question No. 6

Responding Witness: Valerie L. Scott

- Q-6. Please refer to LG&E Witness Blake's Exhibit 1, Schedule 1.16. By including the test period (12 months ending March 2012) in the ten year average, does LG&E agree that it may have double weighted some injury and damages expenses that are already included in the calendar year 2011 data? Please explain why the proposed averaging does not double count these expenses.
- A-6. Yes, the methodology used by LG&E to compute the 10 year average injuries and damages expense is a normalization adjustment that includes the nine months from April to December 2011 in both the 12 months ending December 2011 and the 12 months ending March 2012. This methodology is consistent with the approach approved by the Commission in its Orders in Case Nos. 2009-00549 and 2003-00433. LG&E also proposed a similar adjustment in Case No. 2008-00252, which was resolved by a settlement approved by the Commission.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2012-00222

**Response to First Set of Data Requests of
The Kroger Company
Dated July 31, 2012**

Question No. 7

Responding Witness: Valerie L. Scott

Q-7. Please refer to LG&E Witness Blake's Exhibit 1, Schedule 1.16. Please recalculate the ten year injury and damages average expense using the ten years covering 2002 - 2011. Please provide this calculation in Excel format with formulas intact.

A-7. See attached.

The attachment is being provided in a separate file in Excel format.