

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Certificates of Public Convenience and Necessity)	Case No. 2014-
Green River Generating Station and a Solar Photovoltaic Facility at the)	00002
for the Construction of a Combined Cycle Combustion Turbine at the)	
E.W. Brown Generating Station)	

**DATA REQUESTS OF BLUEGRASS
GENERATION COMPANY, L.L.C. TO APPLICANTS**

Bluegrass Generation Company (Bluegrass), by counsel, submits the following data requests to the Applicants.

DEFINITIONS

1. "Company" or "Companies" shall mean the applicants in this case.
2. "Communication" or "communications" shall mean all meetings, conversations, conferences, discussions, correspondence, messages, telegrams, telefax, mailgrams, and all oral and written expressions or other occurrences whereby thoughts, opinions or data are transmitted between two or more persons.
3. The term or terms "you," or "your" shall refer to the Company, its predecessor(s), if any, as well as its divisions, parent and subsidiary and all related companies for which the Applicants have partial or full ownership or control, all other companies sharing management with the Company, and the officers, directors, employees, agents, representatives, and other personnel thereof and all Affiliates.
4. "Concerning" and "concern" shall mean memorializing, mentioning, to be connected with, comprising, consisting, indicating, describing, referring, relating to, evidencing, showing, discussing, or involving in any way whatsoever the subject matter of the data request.
5. "Describe" when used with respect to an occurrence, event, activity, or any transaction, means to provide a complete and detailed list of its nature, its time and

place and to identify the persons present and involved. The term "describe" when used with respect to a document, means to provide a complete and detailed description of its nature and content. The term "describe," when used with respect to a communication other than a document, means to provide a complete and detailed description of its nature and content.

6. The term or terms "document", "documentation", "data", "material" and "information" shall include, but are not limited to, the following-regardless of format (e.g., electronic, paper copy or other form of audio, electronic or visual recording items: correspondence, memoranda, Financial data, reports, investigations, studies, analyses, calculations, plans, communications, notes, notebooks, marginalia. telephone logs, recordings, opinions, decisions, photographs, drawings, sketches, graphic renderings, bulletins, pamphlets, circulars, articles, press releases, video tapes, data compilations, drafts, brochures, and other documents or tangible things of whatever description that may constitute or contain information within the scope of the data request, which are in the possession, custody and control of the Company - including without limitation, any officers, directors, employees, agents, attorneys or other representatives or Company's Affiliates.

7. "Identify" or "state the identity of" means:

(a) In the case of a person, to state the name; last known residence; employer or business affiliation; and occupation and business position held.

(b) In the case of a company, to state the name; if incorporated, the place of incorporation; the principal place of business; and the identity of the person(s) having knowledge of the matter with respect to which the company is named.

(c) In the case of a document, to state the identity of the person(s) who prepared it; the sender and recipient; the title or a description of the general nature of the subject matter; the date of preparation; the date and manner of distribution and publication; the location of each copy and the identity of the present custodian; and the identity of the person(s) who can identify it.

(d) In the case of a fact, an act or event, to state a complete description of the act or event; when it occurred; where it occurred; the identity of the person(s) performing said act (or omission); the identity of all persons who have knowledge, information or belief about the act; when the act, event, or omission first became known; the circumstances; the manner in which such knowledge was first obtained; and the documents or other writings which memorialize the instance.

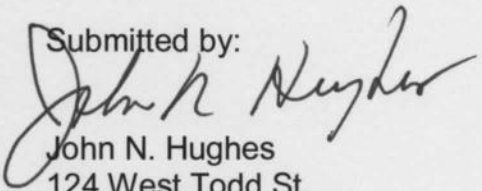
8. "Person" or "Persons" shall mean any individual, association, partnership, corporation, firm, organization, or entity.

9. "Refer," "referring to," "relate," "related" and "relating to" shall mean having a legal, factual or logical connection, relationship, correlation, or association with the subject matter of the request.

Data Requests

1. Refer to the Prefiled testimony of Paul Thompson, page 5. Explain the Applicants' efforts to revise the agreement with Bluegrass Generation Company, LLC to address the Federal Energy Regulatory Commission's (FERC) concerns that resulted in the rejection of the application in *Bluegrass Generation Company, L.L.C.* 139 FERC ¶ 61,094 (2012).
2. Refer to page 5 of the Prefiled Testimony of Paul Thompson, line 13. Describe the process that the Applicants followed to reach the conclusion that constructing the Green River NGCC is a cost effective and reasonable means of assuring adequate capacity for years to come.
3. Refer to page 8 of the Prefiled Testimony of Paul Thompson, line 13. Explain what is meant by "least reasonable cost option" and whether that is a different standard than "least cost option".
4. Refer to page 8 of the Prefiled Testimony of Paul Thompson, line 13. List all factors analyzed in the determination that the Green River NGCC the least cost option for meeting the Applicants demand and the weight given to each factor.
5. To the extent that your analysis treated owned assets differently than capacity acquired through a power purchase agreement, describe in detail the differences in treatment and the basis for such difference. If your analysis did not treat owned capacity differently from purchased capacity, provide all information available to demonstrate that such options were evaluated consistently.
6. Set forth in detail the cost per kW/year of each of the alternatives you evaluated.
7. For each of the first 10 years of operation of the Green River NGCC, what capacity factor did you use in your determination that the Green River NGCC was the least reasonable cost option?
8. In evaluating the Bluegrass Generation Company, LLC proposal, did you attribute any transmission costs to the proposal? Explain.
9. Did you attribute any transmission costs to your evaluation of the Green River NGCC proposal? Explain.
10. Did you evaluate the effect of natural gas availability if the Green River NGCC were to be built? Explain.

11. Refer to the Prefiled testimony of David Sinclair, page 4, line 21. Provide all analyses of the review of the "uncertainty of natural gas prices".
12. Refer to the Prefiled testimony of David Sinclair, pages 17-18. Explain the factors that made it uneconomical to purchase Bluegrass Generation Company.
13. Refer to DSS 1, page 3. Explain the increased costs related to Bluegrass Generation Company mitigation measures.

Submitted by:

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