

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of: :
: :
Joint Application Of Louisville Gas & Electric : Case No. 2014-00002
Company And Kentucky Utilities Company For :
Certificates Of Public Convenience And Necessity :
For The Construction Of A Combined Cycle :
Combustion Turbine At The Green River :
Generating Station And A Solar Photovoltaic :
Facility At The E.W. Brown Generating Station :

FIRST SET OF DATA REQUESTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO LOUISVILLE GAS & ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY

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March 13, 2014

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
11. "LG&E" means Louisville Gas & Electric Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates including PPL Corporation.
12. "KU" means Kentucky Utilities Company, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates including PPL Corporation.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total company as well as Intrastate data, unless otherwise requested.

**KIUC's FIRST SET OF DATA REQUESTS TO LG&E AND KU
PSC CASE NO. 2014-00002**

- Q.1-1. Please refer to the testimony of David Sinclair page 5 lines 20-23. With respect to the wholesale municipal load served by KU please provide the following:
- a. The names of the municipal utilities.
 - b. For the most recent two years, the monthly energy and capacity (demand) sales by municipal utility.
 - c. Copies of the wholesale power contracts.
 - d. The dates each of the municipal power contracts expire.
 - e. Have any of these municipal utilities given notice of contract termination? If yes, please explain.
 - f. Have any of these municipal utilities issued Requests For Proposals (RFP) for new wholesale power providers? If yes, then please provide a copy of the RFP.
 - g. If an RFP has been issued, please provide any response KU has made to the RFP and describe all offers made by KU to retain the load. Please also provide all correspondence, emails or other documents between KU and any of the municipal utilities regarding the termination, renewal or extension of the wholesale power contracts.
 - h. Assume that the KU municipal load was lost to another wholesale supplier, please describe the effect that would have on the projected reserve margins in this filing and the need for the proposed Green River combined cycle plant.
- Q.1-2. Please provide any study performed by KU/LG&E or on their behalf within the last three years quantifying the costs versus benefits of joining PJM or MISO. If no such study has been performed, please explain why not.
- Q.1-3. With respect to PJM, please provide the following:
- a. On a mw basis, how much would the KU/LG&E required reserve margin be reduced as a PJM member with reserves based on the KU/LG&E contribution to PJM's five PLC hours as opposed to the reserves required on a stand-alone basis?
 - b. For the last three years, please identify the KU/LG&E demand that occurred on each of the PJM five PLC hours. If you do not have this information, please explain why you have not been monitoring this issue for determining possible membership into PJM.
 - c. On an mw basis, how much would the KU/LG&E reserve share be reduced as a member of PJM as opposed to the reserve sharing agreement with TVA? How many MW of reserves does KU/LG&E have to carry under the TVA load sharing agreement?
 - d. If KU/LG&E were members of PJM would the market power concerns that caused FERC to conditionally approve the Bluegrass transaction be alleviated? Please explain.
 - e. Assuming that KU/LG&E were members of PJM, please explain the effect that would have on the need for the proposed Green River combined cycle plant.
- Q.1-4. Please provide all production cost models, financial models or other computer models in electronic format utilized in this filing.

- Q.1-5. Based upon the models used in this filing and assuming the Application is approved, please list by year the expected mwh of off-system sales. By off-system sales, we mean all wholesale energy sales not made to KU's all requirements wholesale customers.
- Q.1-6. Please provide all correspondence, emails or other documents in the possession of either Mr. Thompson or Mr. Sinclair that relates in any way to the decision to construct the Green River combined cycle plant or the 10 MW solar facility at the Brown site.
- Q.1-7. Please provide all economic studies that support the decision to build the 10 MW solar facility at the Brown site. If none exist, please explain why not.
- Q.1-8. Have KU/LG&E conducted any studies regarding whether any solar or wind renewable resources are available for purchase at a lower cost than the proposed 10 MW solar facility at the Brown site? If not, then please explain.
- Q.1-9. If KU/LG&E were members of PJM or MISO, would the purchase of wind or solar energy be more affordable? Please explain.
- Q.1-10. Please provide all studies regarding the cost of solar or wind Renewable Energy Credits (RECs).
- Q.1-11. Please explain why no Request for Proposals (RFP) was done to determine if lower cost solar power is available for purchase.

Respectfully submitted,



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