

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

**In The Matter Of:** :

**Joint Application Of Louisville Gas & Electric Company And** : **Case No. 2014-00002**  
**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** :

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

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**COUNSEL FOR KENTUCKY INDUSTRIAL  
UTILITY CUSTOMERS, INC.**

September 5, 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 THIRD SET OF DATA REQUESTS TO LG&E AND KU  
PSC CASE NO. 2014-00002**

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- Q.3-1. With respect to Supplemental Exhibit DSS-3, please provide the following information:
- a. All workpapers (in electronic format with formulas intact) that support the Exhibit.
  - b. The documents that support the REC price forecast.
  - c. The documents that support the avoided energy cost forecast.
  - d. If the avoided energy cost forecast used in DSS-3 is different than the avoided energy cost forecast used in Case No. 2014-00003, please explain the difference. Specifically, refer to Response to Sierra Club Question 12 Attachment 1, page 1 of 1.
  - e. Please reproduce Exhibit DSS-3 using the avoided energy cost forecast from Case No. 2014-00003.
  - f. If Exhibit DSS-3 assumes that RECs from the project will be sold over the life of the project, then please explain how the 10 MW Brown Solar Facility can be used to meet Kentucky's statewide CO2 emission reduction requirements under the EPA's proposed Section 111(d) rule.
- Q.3-2. Explain why the ratepayers of KU and LG&E should be required to pay for the 10 MW Brown Solar Facility if the zero carbon renewable energy from the project will assist in meeting Kentucky's statewide CO2 requirements under the EPA's proposed Section 111(d) rule.
- Q.3-3. Do the Companies agree that the proposed Brown Solar Facility will provide state-wide benefits by reducing Kentucky's carbon intensity under EPA's proposed Section 111(d) rule? Please explain.
- Q.3-4. Are KU's all-requirements FERC wholesale customers going to be allocated their proportional share of the costs and benefits of the Brown Solar Facility? Please explain.
- Q.3-5. Is KU's Virginia jurisdictional utility going to be allocated a proportional share of the costs and benefits of the Brown Solar Facility? If yes, then for purposes of Section 111(d) compliance, will its proportional share of REC's be awarded to Virginia or Kentucky? Please explain.
- Q.3-6. Does Exhibit DSS-3 assume Kentucky retail load will pay for 100% of the Brown Solar Facility, or does it assume a cost assignment to KU's wholesale and Virginia loads?

Respectfully submitted,



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