

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR AN ADJUSTMENT OF ITS)	CASE NO. 2014-00371
ELECTRIC RATES)	

DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY
PROPOUNDED TO THE ATTORNEY GENERAL

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“AG”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 12, 2014.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, the AG, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if the AG receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If the AG objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of the AG, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

Mr. Radigan

1. Please provide all schedules in electronic format with cells intact and all work-papers, source documents, and electronic spreadsheets used in the development of Mr. Radigan's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.
2. Please provide support for amounts listed in Exhibit AG-3 Schedule FWR-4, page 3 of 6.

Mr. Woolridge

3. Please provide all schedules in electronic format with cells intact and all work-papers, source documents, and electronic spreadsheets used in the development of Mr. Woolridge's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.
4. Reference page 32, lines 3-4. Please provide copies of all documents supporting Dr. Woolridge's position that the "three-stage DCF" is a "common application" for investment firms.
5. Reference page 57, lines 13-15. Please provide all analyses conducted by Dr. Woolridge to compare or evaluate KU's rate adjustment mechanisms against those available for the utilities in his proxy group.
6. Please provide Appendixes A, B, and C to Mr. Woolridge's Direct Testimony in pdf and their native format.

Dated: March 23, 2015

Respectfully submitted,



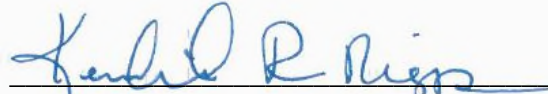
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CERTIFICATE OF COMPLIANCE

This is to certify that Kentucky Utilities Company's March 23, 2015 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 23, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Data Requests is being mailed, by first class United States mail, postage prepaid, to the Commission on March 23, 2015.



Counsel for Kentucky Utilities Company