

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2014-00371**

**Response to Sierra Club's Initial Data Requests  
Dated January 8, 2015**

**Question No. 5**

**Responding Witness: Counsel**

- Q-5. Reference Martin Blake, p. 19, ll. 10-19.
- a) Please provide the rationale for not increasing the basic service charge to \$21.47 per month, as indicated by the cost of service study.
  - b) Please provide copies of all e-mail communications, internal memoranda, reports, or other documentation of Dr. Blake's and the Company's consideration of the amount to increase the basic service charge and of the decision to increase the basic service charge to \$18.00 per month.
  - c) Please provide copies of all presentations to Company management or the Company's Board of Directors regarding consideration of the amount by which to increase the basic service charge and of the decision to increase the basic service charge to \$18.00 per month.
- A-5. b) Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

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**Question No. 19**

**Responding Witness: Counsel**

Q-19. Reference Robert Conroy, p. 20, ll. 5-7.

- a) Please provide copies of all e-mails, memoranda, or other correspondence between the Company and Dr. Blake regarding the development and design of the two proposed optional rate schedules for residential customers.
- b) Please provide copies of all e-mails, memoranda, or other documentation provided to the Company by Dr. Blake of his proposed rate designs for the two optional rate schedules.
- c) Please provide copies of all memoranda, reports, or other documentation of the Company's evaluation of the rate designs proposed by Dr. Blake for the two optional rate schedules.

A-19. a) Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

- b) Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search

is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

- c) Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

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**Question No. 20**

**Responding Witness: Counsel**

Q-20. Reference Robert Conroy, pp. 20-23.

- a) Please provide all documents and communications relating to the success of Rate LEV in shifting consumption away from peak hours, and any other evaluation of customer behavior under the tariff.
- b) Did the Company compare the usage characteristics of Rate LEV customers to that of the residential class more generally? Please explain.
- c) Please describe the Company's analysis in determining what changes were needed in the opt-in time-of-day rates when removing the low-emission vehicle eligibility requirement from its opt-in residential time-of-day rate.

A-20. a) Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

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**Question No. 23**

**Responding Witness: Counsel**

Q-23. Reference Testimony of David Sinclair, pp. 26-27.

- a) Please provide the current number of CSR customers and the total CSR customer demand subject to curtailment.
- b) Please provide the Company's estimate of the effect of the proposed changes to CSR tariffs on the number of CSR customers or customer demand subject to curtailment. Please provide copies of all workpapers relied on to derive these estimates.
- c) Please provide copies of all e-mail communications, internal memoranda, reports, or other documentation of the Company's consideration of changes to the provisions of the CSR tariffs and of the decision to adopt the proposed changes.
- d) Please provide copies of all presentations to Company management or the Company's Board of Directors regarding consideration of changes to the provisions of the CSR tariffs and of the decision to adopt the proposed changes.
- e) Please state the basis for the Company's proposal to limit the total hours of curtailment to 100.
- f) Has the Company evaluated any additional load control or demand response mechanisms in addition to the CSR? If so, please describe. If not, why not?

A-23. c) Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's

procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

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**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated January 8, 2015**

**Question No. 17**

**Responding Witness: Counsel**

- Q.1-17. Please provide a copy of all studies, analyses, reports, and correspondence between the Company and its pension actuaries discussing and/or quantifying the change in the 2015, 2016, and/or 2017 pension cost proposed by the Company for the test year in this filing.
- A.1-17. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

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**Question No. 30**

**Responding Witness: Counsel**

- Q.1-30. Refer to pages 21-22 of Mr. Thompson's Direct Testimony wherein he addresses the Trimble County 2 design issues that had to be remedied during outages in 2014.
- a. Please provide a detailed description of the design flaws that had to be remedied and the course of action taken to complete the project.
  - b. Please provide the total costs, both capital and O&M, incurred to correct the design flaws.
  - c. Please indicate who was primarily responsible for paying for the remediation work caused by the design flaws.
  - d. Please indicate the extent to which the remediation efforts were covered under vendor warranties that were exercised.
  - e. Please provide the accounting entries and related backup documentation used to book the costs of the remediation efforts. In addition, provide the dates when the entries were recorded.
  - f. Please provide copies of all reports, studies, memos, or emails describing any of the following: the scope of the problem, increased fuel expense due to the problem, increased purchase power expense due to the problem, reduced off-system sales due to the problem, remediation required due to the problem, costs incurred to correct the problem, or problem resolution.
  - g. Please provide the amount of depreciation expense taken by the Company in 2013, in the base year, and in the test year related to the remediation efforts.
  - h. Please provide the amount of accumulated depreciation and ADIT included in the base year and in the test year related to the remediation efforts.

A.1-30. f. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine and otherwise seeks the production of information irrelevant to the issues in the case. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, or otherwise are irrelevant, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

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**Response to First Set of Data Requests of  
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Dated January 8, 2015**

**Question No. 40**

**Responding Witness: Counsel**

- Q.1-40. Please provide all internal emails in the possession of any of the witnesses in this case which discuss the expected level of off-system sales margins for the base year and the test year.
- A.1-40. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

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**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
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**Question No. 56**

**Responding Witness: Counsel**

- Q.1-56. Please provide all emails in the possession of any of the witnesses in this case that address or discuss the decision of LGE/KU to modify its CSR tariff to change the curtailment limitation criterion from “only during system reliability events” to “none.”
- A.1-56. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission’s procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2014-00371**

**Response to Attorney General's Initial Requests for Information  
Dated January 8, 2015**

**Question No. 80**

**Responding Witness: Counsel**

- Q-80. Internal Audits. Provide a list of internal audits completed, scheduled, or in progress at the Company for the years 2010-2014. For each, list the subject of the audit, date of audit, date of report, and title of report. Provide a copy of each of the completed studies for review on-site.
- A-80. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the work product of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and will seasonably supplement this response through a rolling production of documents.

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**Question No. 120**

**Responding Witness: Counsel**

Q-120. Please provide complete copies of all correspondence with the following parties from 2008-2012, inclusive, regarding FASB Statement No. 143, FIN 47 and FERC Order 631 in RM02-7-000:

- a. External auditors and other public accounting firms,
- b. Consultants,
- c. External counsel,
- d. Federal and State regulatory agencies, and
- e. Internal Revenue Service.

A-120.c. Objection. The response to this question requires the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine.

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**Question No. 171**

**Responding Witness: Counsel**

- Q-171. Board of Directors Meeting Minutes. Please provide copies of the Board of Directors Meeting Minutes for the years 2009 through 2012 and 2013 year-to-date.
- A-171. Objection. This question seeks the production of information that is irrelevant to the issues in this case and relates to expectations of forecasted rate case outcomes. This information is not relevant to the analysis of the test period in this case. Without waiver of this objection, the Company will produce relevant information responsive to this request in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2014-00371**

**Response to Attorney General's Initial Requests for Information  
Dated January 8, 2015**

**Question No. 179**

**Responding Witness: Counsel**

- Q-179. Please provide copies of all presentations made to rating agencies and/or investment firms by PPL, and/or Kentucky Utilities between January 1, 2013 and the present.
- A-179. Objection. This question seeks the production of documents that are irrelevant to the issues in this case and relate to non-utility or non-jurisdictional utility activities. These activities are not relevant to the analysis of the test period in this case. Without waiver of this objection, the Company will produce relevant information responsive to this request in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response.