

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
ALICE HOWELL, CARL VOGEL, AND SIERRA CLUB'S SECOND SET OF
DATA REQUESTS
DATED FEBRUARY 6, 2015

FILED: FEBRUARY 20, 2015

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Dr. Martin J. Blake**, being duly sworn, deposes and states that he is a Principal of The Prime Group, LLC, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Martin J. Blake
Dr. Martin J. Blake

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 10th day of February 2015.

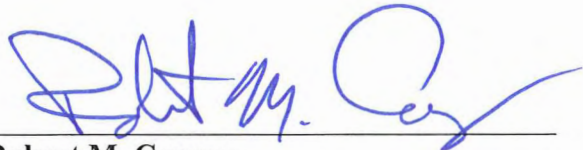
Judy Schooler (SEAL)
Notary Public

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Director - Rates for Louisville Gas and Electric Company and Kentucky Utilities Company, an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 18th day of February 2015.



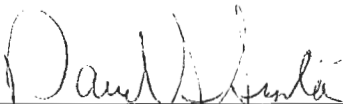
Notary Public (SEAL)

My Commission Expires:
JUDY SCHUSTER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **David S. Sinclair**, being duly sworn, deposes and says that he is Vice President, Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



David S. Sinclair

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 15th day of February 2015.



Notary Public (SEAL)

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

KENTUCKY UTILITIES COMPANY

CASE NO. 2014-00371

**Response to Alice Howell, Carl Vogel, and Sierra Club's Second Set of Data
Requests Dated February 6, 2015**

Question No. 1

Responding Witness: Robert M. Conroy / Counsel

- Q-1. Reference Attachment to Response to Sierra Club 1-5(b), pp. 1-2. In an October 29, 2014 e-mail, Jeff Wernert of the Prime Group poses the following question to Mr. Conroy: "For rate design, how many classes would you like to propose going to cost-based customer charges?"
- a) Please describe in detail the Company's response to Mr. Wernert's question. Specifically, for each rate class other than the residential class, please explain whether the Company is proposing to increase the customer charge to cost-based levels and describe the rationale for its decision regarding whether to increase the customer charge.
 - b) Please provide copies of all e-mail communications, text messages, internal memoranda, reports, or other documentation of the Company's consideration of Mr. Wernert's question and decisions regarding whether to increase customer charges for the non-residential rate classes
 - c) Please provide copies of all presentations to Company management or the Company's Board of Directors regarding consideration of Mr. Wernert's question and decisions regarding whether to increase customer charges for the non-residential rate classes.
- A-1.
- a) Outside of the residential rate class, the Basic Service Charge ("BSC") for the other rate classes closely approximated the cost of service. The Company directed the Prime Group to follow the cost of service when designing the BSC for each rate schedule while keeping the BSC at whole round numbers.
 - b) See the Company's Objection filed on February 16, 2015. See attached. The Company is also filing contemporaneously herewith a privilege log describing the responsive documents the Company is not producing on the ground of attorney-client or work product privilege.
 - c) The Company did not make any presentation to management or the Board of Directors on the proposed BSC for non-residential rate schedules.

From: Larry Feltner(lfeltner@theprimegroupplc.com)
To: Conroy, Robert
CC:
BCC:
Subject: Re: Customer Charges
Sent: 10/29/2014 11:28:18 AM -0400 (EDT)
Attachments:

Robert,

I'll try to get you something soon. I am on the phone with Clay and P am about a problem with the gas study.

Thanks

Larry

-----Original Message-----

From: Conroy, Robert
Sent: Wednesday, October 29, 2014 10:53 AM
To: 'jwernert@theprimegroupplc.com'
Cc: Larry Feltner ; Marty Blake
Subject: RE: Customer Charges

Do you have the LG&E numbers comparable to the below?

Robert M. Conroy
Director, Rates
LG&E and KU Services Company
(502) 627-3324 (phone)
(502) 627-3213 (fax)
(502) 741-4322 (mobile)
robert.conroy@lge-ku.com

-----Original Message-----

From: jwernert@theprimegroupplc.com [mailto:jwernert@theprimegroupplc.com]
Sent: Wednesday, October 29, 2014 10:18 AM
To: Conroy, Robert
Cc: Larry Feltner; Marty Blake
Subject: Customer Charges

Robert,

For rate design, how many classes would you like to propose going to cost-based customer charges? The only one I remember discussing specifically was Residential and for KU after the increase Larry sent to you, the Residential class is showing a \$21.47 customer charge which is slightly higher than we had discussed. You had tossed around the \$18 number internally but I wanted to see what your stomach was for going in closer to what the Study is showing. Below are the calculated customer charges for all of the classes for KU:

Residential: \$21.47
GS Single Phase: \$38.45
GS Three Phase: \$58.97
AES Single Phase: \$78.75
AES Three Phase: \$96.92
PS Secondary: \$82.27

PS Primary: \$173.17
TOD Secondary: \$213.27
TOD Primary: \$316.15
RTS: \$1001.93
FLS: \$1340.82

Thanks,

Jeff Wernert

----- The information contained in this transmission is intended only for the person or entity to which it is directly addressed or copied. It may contain material of confidential and/or private nature. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is not allowed. If you received this message and the information contained therein by error, please contact the sender and delete the material from your/any storage medium.

From: jwernert@theprimegrouppllc.com(jwernert@theprimegrouppllc.com)
To: Conroy, Robert
CC: Larry Feltner; Marty Blake
BCC:
Subject: Re: Customer Charges
Sent: 10/29/2014 10:56:19 AM -0400 (EDT)
Attachments:

Larry is looking at LG&E rates but I believe the residential rate after the increase is just under \$20.

Jeff

Quoting "Conroy, Robert" <Robert.Conroy@lge-ku.com>:

> Do you have the LG&E numbers comparable to the below?

>
>
>

> Robert M. Conroy
> Director, Rates
> LG&E and KU Services Company
> (502) 627-3324 (phone)
> (502) 627-3213 (fax)
> (502) 741-4322 (mobile)
> robert.conroy@lge-ku.com

>
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> Sent: Wednesday, October 29, 2014 10:18 AM
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> Subject: Customer Charges

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> sent to you, the Residential class is showing a \$21.47 customer
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> sender and delete the material from your/any storage medium.

From: Larry Feltner(lfeltner@theprimegroupplc.com)
To: Conroy, Robert
CC:
BCC:
Subject: Re: Customer Charges
Sent: 10/29/2014 10:38:24 AM -0400 (EDT)
Attachments:

When would you like to talk? Marty is out of the office until lunch. I am the only one here. If you want to do it now, that is fine with me. If you want to wait on Marty, lets do it after lunch.

Thanks

Larry

-----Original Message-----

From: Conroy, Robert
Sent: Wednesday, October 29, 2014 10:33 AM
To: 'jwernert@theprimegroupplc.com'
Cc: Larry Feltner ; Marty Blake
Subject: RE: Customer Charges

Can we have a quick call to discuss?

Robert M. Conroy
Director, Rates
LG&E and KU Services Company
(502) 627-3324 (phone)
(502) 627-3213 (fax)
(502) 741-4322 (mobile)
robert.conroy@lge-ku.com

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RTS: \$1001.93
FLS: \$1340.82

Thanks,

Jeff Wernert

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From: jwernert@theprimegroupplc.com(jwernert@theprimegroupplc.com)
To: Conroy, Robert
CC: Larry Feltner; Marty Blake
BCC:
Subject: Re: Customer Charges
Sent: 10/29/2014 10:37:35 AM -0400 (EDT)
Attachments:

Robert,

I'm in a meeting until 11:30 but am available anytime after that.
Would you like me to give you a call when I'm free?

Jeff

Quoting "Conroy, Robert" <Robert.Conroy@lge-ku.com>:

> Can we have a quick call to discuss?

>
>
>

> Robert M. Conroy
> Director, Rates
> LG&E and KU Services Company
> (502) 627-3324 (phone)
> (502) 627-3213 (fax)
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> robert.conroy@lge-ku.com

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> Sent: Wednesday, October 29, 2014 10:18 AM
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> Cc: Larry Feltner; Marty Blake
> Subject: Customer Charges

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> Thanks,

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> Jeff Wernert

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> sender and delete the material from your/any storage medium.

From: jwernert@theprimegrouppllc.com(jwernert@theprimegrouppllc.com)
To: Conroy, Robert
CC: Larry Feltner; Marty Blake
BCC:
Subject: Customer Charges
Sent: 10/29/2014 10:18:10 AM -0400 (EDT)
Attachments:

Robert,

For rate design, how many classes would you like to propose going to cost-based customer charges? The only one I remember discussing specifically was Residential and for KU after the increase Larry sent to you, the Residential class is showing a \$21.47 customer charge which is slightly higher than we had discussed. You had tossed around the \$18 number internally but I wanted to see what your stomach was for going in closer to what the Study is showing. Below are the calculated customer charges for all of the classes for KU:

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FLS: \$1340.82

Thanks,

Jeff Wernert

From: Conroy, Robert(/O=LGE/OU=LOUISVILLE/CN=RECIPIENTS/CN=CONROYR)
To: 'Larry Feltner'
CC:
BCC:
Subject: RE: Customer Charges
Sent: 10/29/2014 11:34:41 AM -0400 (EDT)
Attachments:

That is fine. I spoke to Jeff on the KU and he was going to coordinate with you on the LG&E.

Robert M. Conroy
Director, Rates
LG&E and KU Services Company
(502) 627-3324 (phone)
(502) 627-3213 (fax)
(502) 741-4322 (mobile)
robert.conroy@lge-ku.com

-----Original Message-----

From: Larry Feltner [mailto:lfeltner@theprimegroupllc.com]
Sent: Wednesday, October 29, 2014 11:28 AM
To: Conroy, Robert
Subject: Re: Customer Charges

Robert,

I'll try to get you something soon. I am on the phone with Clay and P am about a problem with the gas study.

Thanks

Larry

-----Original Message-----

From: Conroy, Robert
Sent: Wednesday, October 29, 2014 10:53 AM
To: 'jwernert@theprimegroupllc.com'
Cc: Larry Feltner ; Marty Blake
Subject: RE: Customer Charges

Do you have the LG&E numbers comparable to the below?

Robert M. Conroy
Director, Rates
LG&E and KU Services Company
(502) 627-3324 (phone)
(502) 627-3213 (fax)
(502) 741-4322 (mobile)
robert.conroy@lge-ku.com

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From: Conroy, Robert(/O=LGE/OU=LOUISVILLE/CN=RECIPIENTS/CN=CONROYR)
To: 'jwernert@theprimegroupplc.com'
CC: Larry Feltner; Marty Blake
BCC:
Subject: RE: Customer Charges
Sent: 10/29/2014 10:53:00 AM -0400 (EDT)
Attachments:

Do you have the LG&E numbers comparable to the below?

Robert M. Conroy
Director, Rates
LG&E and KU Services Company
(502) 627-3324 (phone)
(502) 627-3213 (fax)
(502) 741-4322 (mobile)
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FLS: \$1340.82

Thanks,

Jeff Wernert

From: Conroy, Robert(/O=LGE/OU=LOUISVILLE/CN=RECIPIENTS/CN=CONROYR)
To: 'Larry Feltner'
CC:
BCC:
Subject: RE: Customer Charges
Sent: 10/29/2014 10:49:25 AM -0400 (EDT)
Attachments:

I will give you a quick call.

Robert M. Conroy
Director, Rates
LG&E and KU Services Company
(502) 627-3324 (phone)
(502) 627-3213 (fax)
(502) 741-4322 (mobile)
robert.conroy@lge-ku.com

-----Original Message-----

From: Larry Feltner [mailto:lfeltner@theprimegroupplc.com]
Sent: Wednesday, October 29, 2014 10:38 AM
To: Conroy, Robert
Subject: Re: Customer Charges

When would you like to talk? Marty is out of the office until lunch. I am the only one here. If you want to do it now, that is fine with me. If you want to wait on Marty, lets do it after lunch.

Thanks

Larry

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From: Conroy, Robert(/O=LGE/OU=LOUISVILLE/CN=RECIPIENTS/CN=CONROYR)
To: 'jwernert@theprimegroupplc.com'
CC: Larry Feltner; Marty Blake
BCC:
Subject: RE: Customer Charges
Sent: 10/29/2014 10:33:58 AM -0400 (EDT)
Attachments:

Can we have a quick call to discuss?

Robert M. Conroy
Director, Rates
LG&E and KU Services Company
(502) 627-3324 (phone)
(502) 627-3213 (fax)
(502) 741-4322 (mobile)
robert.conroy@lge-ku.com

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Cc: Larry Feltner; Marty Blake
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Thanks,

Jeff Wernert

**Kentucky Public Service Commission
Case Nos. 2014-00371 and 2014-00372**

Privilege Log of Kentucky Utilities Company and Louisville Gas and Electric Company

February 20, 2015

Document ID	Document Date	Data Request(s) to Which Document Is Responsive	E-mail Subject or Document File Name	From	To	Cc	Bcc	Privilege Type Asserted	Basis for Asserting Privilege	
33441	2014-10-15	SC 2-1(b)	RE: ROC Meeting - KY Rate Case	Conroy, Robert /O=LGE/OU=LOUISVILLE /CN=RECIPIENTS/CN=C ONROYR	Sturgeon, Allyson Allyson.Sturgeon@lge-ku.com; Staton, Ed Ed.Staton@lge-ku.com; Blake, Kent Kent.Blake@lge-ku.com; Thompson, Paul Paul.Thompson@lge-ku.com; Siemens, George George.Siemens@lge-ku.com; Malloy, John John.Malloy@lge-ku.com; O brien, Dorothy (Dot) Dorothy.O brien@lge-ku.com; Scott, Valerie Valerie.Scott@lge-ku.com; Beer, Mike Mike.Beer@lge-ku.com; Voyles, John John.Voyles@lge-ku.com; Lovekamp, Rick Rick.Lovekamp@lge-ku.com; Sinclair, David David.Sinclair@lge-ku.com; Rives, Brad Brad.Rives@lge-ku.com; Jessee, Tom Tom.Jessee@lge-ku.com; Bellar, Lonnie Lonnie.Bellar@lge-ku.com; Whelan, Chris Chris.Whelan@lge-ku.com; Huff, David David.Huff@lge-ku.com; Reynolds, Gerald Gerald.Reynolds@lge-ku.com	Thomas, Greg Greg.Thomas@lge-ku.com; Woodworth, Steve Steve.Woodworth@lge-ku.com; Brunner, Bob Bob.Brunner@lge-ku.com; Bruner, Cheryl Cheryl.Bruner@lge-ku.com; Schram, Chuck Chuck.Schram@lge-ku.com; Arbough, Dan Dan.Arbough@lge-ku.com; Cosby, David David.Cosby@lge-ku.com; Garrett, Chris Chris.Garrett@lge-ku.com; Collins, Natasha Natasha.Collins@lge-ku.com; Freibert, David David.Freibert@lge-ku.com; Pottinger, Paula Paula.Pottinger@lge-ku.com; Mudd, Ken Ken.Mudd@lge-ku.com; Leichty, Doug Doug.Leichty@lge-ku.com; Schroeder, Andrea Andrea.Schroeder@lge-ku.com; Conroy, Robert Robert.Conroy@lge-ku.com			Attorney-Client and Work Product	Confidential and privileged communication between client and counsel re proposed tariff changes. Document contains attorney work product created in anticipation of rate case supervised by counsel.

**Kentucky Public Service Commission
Case Nos. 2014-00371 and 2014-00372**

Privilege Log of Kentucky Utilities Company and Louisville Gas and Electric Company

February 20, 2015

Document ID	Document Date	Data Request(s) to Which Document Is Responsive	E-mail Subject or Document File Name	From	To	Cc	Bcc	Privilege Type Asserted	Basis for Asserting Privilege	
					Staton, Ed Ed.Staton@lge-ku.com; Bellar, Lonnie Lonnie.Bellar@lge-ku.com; Thomas, Greg Greg.Thomas@lge-ku.com; Malloy, John John.Malloy@lge-ku.com; Murphy, Clay Clay.Murphy@lge-ku.com; Sturgeon, Allyson Allyson.Sturgeon@lge-ku.com; Crosby, W. Duncan (duncan.crosby@skofirm.com) duncan.crosby@skofirm.com; Bruner, Cheryl Cheryl.Bruner@lge-ku.com; Huff, David David.Huff@lge-ku.com; Cockerill, Butch Butch.Cockerill@lge-ku.com; Wolfe, John John.Wolfe@lge-ku.com; Simon, Denise Denise.Simon@lge-ku.com;					
33442	2014-10-15	SC 2-1(b)	FW: Final Versions of Proposed Tariffs	Woodworth, Steve /O=LGE/OU=LOUISVILLE /CN=RECIPIENTS/CN=W OODWORTHS	McFarland, Beth Beth.McFarland@lge-ku.com; Lowery, Mike Mike.Lowery@lge-ku.com		Conroy, Robert Robert.Conroy@lge-ku.com; Bush, Howard Howard.Bush@lge-ku.com; Reinert, Marty Marty.Reinert@lge-ku.com	Attorney-Client and Work Product	Confidential and privileged communication between client and counsel re proposed tariff changes. Document contains attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.	
33443	2014-10-14	SC 2-1(b)	KU Proposed Tariff PSC No. 17 -8th DRAFT 10-14-14-redlined.docx					Attorney-Client and Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.	
33444	2014-10-14	SC 2-1(b)	LG&E Proposed Tariff PSC Gas No. 10 - 6th DRAFT- 10-14-14-redlined.docx					Attorney-Client and Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.	
33445	2014-10-14	SC 2-1(b)	LGE Proposed Tariff PSC Electric No 10-8th DRAFT- 10-14-14-redlined.docx					Attorney-Client and Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.	
35041	2009-01-12	SC 2-1(b)	KU Rate Summary - Current vs Proposed.xls					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.	

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February 20, 2015

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35042	2009-01-12	SC 2-1(b)	LG&E Electric Rate Summary - Current vs Proposed.xls					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
35043	2009-01-12	SC 2-1(b)	LG&E Gas Rate Summary - Current vs Proposed.xls					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
35489	2014-11-17	SC 2-1(b)	Revised Conroy testimony drafts (2014-00371 and 2014-00372)	Crosby, W. Duncan duncan.crosby@skofirm.com	Sturgeon, Allyson Allyson.Sturgeon@lge-ku.com; Conroy, Robert Robert.Conroy@lge-ku.com	Ingram III, Lindsey L.Ingram@skofirm.com; Riggs, Kendrick R. kendrick.riggs@skofirm.com		Attorney-Client	Confidential and privileged communication between client and counsel re rate-case testimony. Confidential and privileged communication between client and counsel re rate-case testimony.
35490	2014-11-17	SC 2-1(b)	Conroy KU redline.pdf					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re rate-case testimony.
35491	2014-11-17	SC 2-1(b)	Conroy LG&E redline.pdf					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re rate-case testimony.
35492	2014-11-17	SC 2-1(b)	LOUISVILLE-#1120931-v11-ROBERT_M__CO_NROY_-_KU_Direct_Testimony_(2014_KY_Rate_Case).DOCX					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
35493	2014-11-17	SC 2-1(b)	LOUISVILLE-#1121166-v11-ROBERT_M__CO_NROY_-_LG&E_Direct_Testimony_(2014_KY_Rate_Case).DOCX					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication re tariff changes.
37884	2014-11-03	SC 2-1(b)	FW: Notice of Filing	Conroy, Robert /O=LGE/OU=LOUISVILLE/CN=RECIPIENTS/CN=CONROYR	Gillespie, Mary Mary.Gillespie@lge-ku.com; Sturgeon, Allyson Allyson.Sturgeon@lge-ku.com			Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.

**Kentucky Public Service Commission
Case Nos. 2014-00371 and 2014-00372**

Privilege Log of Kentucky Utilities Company and Louisville Gas and Electric Company

February 20, 2015

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									Confidential and privileged communication re tariff changes.
37885	2014-11-03	SC 2-1(b)	KU Notice of Filing - 2014-00371-5th DRAFT (SKO).docx					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication re tariff changes.
37886	2014-11-03	SC 2-1(b)	LGE Notice of Filing - 2014-00372 - 5th DRAFT (SKO).doc					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
89301	2009-01-12	SC 2-1(b)	KU Rate Summary - Current vs Proposed.xls					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
89302	2009-01-12	SC 2-1(b)	LG&E Electric Rate Summary - Current vs Proposed.xls					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
89369	2009-01-12	SC 2-1(b)	KU Rate Summary - Current vs Proposed.xls					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
89370	2014-11-10	SC 2-1(b)	KU Side-By Side Tariffs-2014-00371-FINAL.pdf					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
89371	2009-01-12	SC 2-1(b)	LG&E Electric Rate Summary - Current vs Proposed.xls					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
89372	2009-01-12	SC 2-1(b)	LG&E Gas Rate Summary - Current vs Proposed.xls					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
89373	2014-07-07	SC 2-1(b)	LGE Electric Side-By-Side Tariffs-2014-00372-FINAL.pdf					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
89374	2014-10-31	SC 2-1(b)	LGE Gas Side-By-Side Tariffs - 2014-00372-FINAL.pdf					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
95510	2009-01-12	SC 2-1(b)	KU Rate Summary - Current vs Proposed.xls					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
95512	2009-01-12	SC 2-1(b)	LG&E Electric Rate Summary - Current vs Proposed.xls					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.

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Privilege Log of Kentucky Utilities Company and Louisville Gas and Electric Company

February 20, 2015

Document ID	Document Date	Data Request(s) to Which Document Is Responsive	E-mail Subject or Document File Name	From	To	Cc	Bcc	Privilege Type Asserted	Basis for Asserting Privilege
95513	2009-01-12	SC 2-1(b)	LG&E Gas Rate Summary - Current vs Proposed.xls					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
338887	2014-06-25	SC 2-1(b)	KU TEMPLATE - 06252014 Tariff Changes.docx					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
338888	2014-06-25	SC 2-1(b)	LG&E TEMPLATE - 06252014 Tariff Changes.docx					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
					Conroy, Robert Robert.Conroy@lge-ku.com; Sturgeon, Allyson Allyson.Sturgeon@lge-ku.com;				Confidential and privileged communication between client and counsel re proposed tariff changes.
338889	2014-07-28	SC 2-1(b)	FW: Proposed tariff changes	Woodworth, Steve /O=LGE/OU=LOUISVILLE /CN=RECIPIENTS/CN=W OODWORTHS	Lovekamp, Rick Rick.Lovekamp@lge-ku.com; Crosby, Duncan Duncan.Crosby@lge-ku.com	Reinert, Marty Marty.Reinert@lge-ku.com; Bush, Howard Howard.Bush@lge-ku.com		Attorney-Client and Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.
338890	2014-07-24	SC 2-1(b)	KU TEMPLATE - 072314 Tariff Changes.docx					Attorney-Client and Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.
338891	2014-07-24	SC 2-1(b)	LGE ELECTRIC TEMPLATE - 072314 Tariff Changes.docx					Attorney-Client and Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.
338892	2014-07-28	SC 2-1(b)	LGE GAS TEMPLATE - 071714 Tariff Changes.docx					Attorney-Client and Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
338895	2014-07-15	SC 2-1(b)	KU TEMPLATE - 07152014 Tariff Changes.docx					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
338896	2014-07-15	SC 2-1(b)	LG&E TEMPLATE - 07152014 Tariff Changes.docx					Work Product	Document contains attorney work product created in anticipation of rate case supervised by counsel.
338958	2014-07-07	SC 2-1(b)	KU TEMPLATE - 070714 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.

**Kentucky Public Service Commission
Case Nos. 2014-00371 and 2014-00372**

Privilege Log of Kentucky Utilities Company and Louisville Gas and Electric Company

February 20, 2015

Document ID	Document Date	Data Request(s) to Which Document Is Responsive	E-mail Subject or Document File Name	From	To	Cc	Bcc	Privilege Type Asserted	Basis for Asserting Privilege
338959	2014-07-07	SC 2-1(b)	LGE TEMPLATE - 070714 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
					Sturgeon, Allyson Allyson.Sturgeon@lge-ku.com; Staton, Ed Ed.Staton@lge-ku.com; Riggs, Kendrick R. Conroy, Robert /O=LGE/OU=LOUISVILLE /CN=RECIPIENTS/CN=C ONROYR	kendrick.riggs@skofirm.com; Schroeder, Andrea Andrea.Schroeder@lge-ku.com		Attorney-Client and Work Product	Confidential and privileged communication between client and counsel re: proposed tariff changes. Document is attorney work product created in anticipation of rate case supervised by counsel.
346194	2014-06-03	SC 2-1(b)	RE: Discuss Rate Case Issues						Confidential and privileged communication between client and counsel re: proposed tariff changes.
346198	2014-06-03	SC 2-1(b)	Summary - Tariff Topics-Issues 06-01-14.docx					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
346241	2014-06-03	SC 2-1(b)	Summary - Tariff Topics-Issues 06-01-14.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
347496	2014-07-02	SC 2-1(b)	KU TEMPLATE - 07022014 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
347497	2014-07-03	SC 2-1(b)	LG&E TEMPLATE - 07022014 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
348022	2014-07-07	SC 2-1(b)	KU TEMPLATE - 070714 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
348023	2014-07-07	SC 2-1(b)	LGE TEMPLATE - 070714 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
348025	2014-07-15	SC 2-1(b)	KU TEMPLATE - 07152014 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
348026	2014-07-15	SC 2-1(b)	LG&E TEMPLATE - 07152014 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
430376	2014-07-18	SC 2-1(b)	GAS LG&E TEMPLATE - 07172014 Tariff changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
430377	2014-07-17	SC 2-1(b)	KU TEMPLATE - 071714 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
430378	2014-07-18	SC 2-1(b)	LGE TEMPLATE - 071714 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.

**Kentucky Public Service Commission
Case Nos. 2014-00371 and 2014-00372**

Privilege Log of Kentucky Utilities Company and Louisville Gas and Electric Company

February 20, 2015

Document ID	Document Date	Data Request(s) to Which Document Is Responsive	E-mail Subject or Document File Name	From	To	Cc	Bcc	Privilege Type Asserted	Basis for Asserting Privilege
515510	2014-07-02	SC 2-1(b)	KU TEMPLATE - 07022014 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
515511	2014-07-03	SC 2-1(b)	LG&E TEMPLATE - 07022014 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
516002	2014-07-07	SC 2-1(b)	KU TEMPLATE - 070714 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.
516003	2014-07-07	SC 2-1(b)	LGE TEMPLATE - 070714 Tariff Changes.docx					Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.
516682	2014-07-24	SC 2-1(b)	KU TEMPLATE - 072314 Tariff Changes.docx					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.
516683	2014-07-24	SC 2-1(b)	LGE ELECTRIC TEMPLATE - 072314 Tariff Changes.docx					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.
516684	2014-07-28	SC 2-1(b)	LGE GAS TEMPLATE - 071714 Tariff Changes.docx					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel. Confidential and privileged communication between client and counsel re proposed tariff changes.
516686	2014-07-24	SC 2-1(b)	KU TEMPLATE - 072314 Tariff Changes.docx					Attorney-Client and Work Product	Document is attorney work product created in anticipation of rate case supervised by counsel.

**Kentucky Public Service Commission
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516687	2014-07-24	SC 2-1(b)	LGE ELECTRIC TEMPLATE - 072314 Tariff Changes.docx					Attorney-Client and Work Product	Confidential and privileged communication between client and counsel re proposed tariff changes. Document is attorney work product created in anticipation of rate case supervised by counsel.
516688	2014-07-28	SC 2-1(b)	LGE GAS TEMPLATE - 071714 Tariff Changes.docx					Attorney-Client and Work Product	Confidential and privileged communication between client and counsel re proposed tariff changes. Document is attorney work product created in anticipation of rate case supervised by counsel.

KENTUCKY UTILITIES COMPANY

CASE NO. 2014-00371

**Response to Alice Howell, Carl Vogel, and Sierra Club's Second Set of Data
Requests Dated February 6, 2015**

Question No. 2

Responding Witness: Robert M. Conroy / Dr. Martin J. Blake

Q-2. Reference Response to Sierra Club 1-9(a).

- a) Please describe the "other energy solutions" that may be more cost-effective than "installing, operating and maintaining the minimum set of equipment necessary to provide service" to residential customers with low kWh usage. Please provide copies of all memoranda, presentations, reports, or other documents in the Company's possession regarding these "other energy solutions."
- b) Is the Company aware of any low-usage residential customers who initiated service under the current customer charge rather than installing more cost-effective energy solutions? If so, please explain how the Company determined that it was uneconomic for these customers to initiate service.

A-2. a) Dr. Blake has extensive experience with increasing customer charges for rural electric cooperatives to reflect the full customer-related distribution fixed cost. When the customer charge is increased to reflect cost causation, some low-usage customers that have electric service to a low-usage load, such as a stock tank or a barn, have discontinued utility service and have met their need with other energy solutions. In the case of stock tanks, solar powered low pumps were used to replace utility service. In the case of service to barns, some customers used gasoline or diesel powered generators to meet this need. In the case of KU, it is hard to tell what other energy solutions, if any, may be employed, because customers have had no cost based price signal to which to respond.

The Company is not aware of any "other energy solutions [that] may be more cost effective" for residential customers. The Company's rates remain among the lowest in the nation, which would tend to make it more challenging to have more cost-effective energy solutions. Because the Company is unaware of any such "other energy solutions" for residential customers and has not undertaken an effort to identify them if they exist, there are no documents responsive to the request.

b) No. See the response to part a.

KENTUCKY UTILITIES COMPANY

CASE NO. 2014-00371

**Response to Alice Howell, Carl Vogel, and Sierra Club's Second Set of Data
Requests Dated February 6, 2015**

Question No. 3

Responding Witness: David S. Sinclair / Robert M. Conroy

- Q-3. Reference Attachment to Response to Sierra Club 1-10(d).
- a) For each rate period specified for avoided energy costs (e.g., Spring Weekend Off-Peak), please provide:
 - i) The calendar months included in each seasonal period.
 - ii) The clock hours included in each daily time period.
 - iii) The kWh usage by an average residential customer during the rate period, either forecasted for the test year or for the most recent historical period for which such usage data exists.
 - b) Please provide the average annual load factor for the residential class, either forecasted for the test year or for the most recent 12-month period for which such data exists.
- A-3. (a)(i) Winter includes December through February, spring includes March through May, summer includes June through September, and autumn includes October through November.
- (a)(ii) Winter and autumn peak hours include weekday hours ending 8 through 23. Summer and spring peak hours include weekday hours ending 7 through 22. All other hours are considered off-peak, respectively.
- (a)(iii) The table below represents the estimated kWh usage by an average residential customer based on a sample of residential customers from the period July 2013 through June 2014.

Season	Day	Type	Est. Avg. kWh
Winter	Weekday	Off-peak	1,371
		Peak	2,670
	Weekend	Off-peak	1,426
Spring	Weekday	Off-peak	682
		Peak	1,542
	Weekend	Off-peak	922
Summer	Weekday	Off-peak	734
		Peak	2,603
	Weekend	Off-peak	1,328
Autumn	Weekday	Off-peak	458
		Peak	994
	Weekend	Off-peak	610

- b) The data does not exist on a revenue class basis. The load factor for the residential (“RS”) rate class was 30.8% for the period July 2013 through June 2014.

KENTUCKY UTILITIES COMPANY

CASE NO. 2014-00371

**Response to Alice Howell, Carl Vogel, and Sierra Club's Second Set of Data
Requests Dated February 6, 2015**

Question No. 4

Responding Witness: Robert M. Conroy

- Q-4. Reference Response to Sierra Club 1-18. For the 12-month period from January through December of 2013, please provide the following information:
- a) Number of residential customers.
 - b) Annual kWh sales to all residential customers.
 - c) Average monthly kWh consumption by all residential customers.
 - d) Number of residential customers who received assistance from a third-party agency in 2013.
 - e) Annual kWh sales to residential customers who received assistance from a third-party agency in 2013.
 - f) Average monthly kWh consumption by residential customers who received assistance from a third-party agency in 2013.
 - g) Number of residential customers whose average monthly consumption equals or falls below the average monthly consumption for all residential customers.
 - h) Number of residential customers whose average monthly consumption exceeds the average monthly consumption for all residential customers.
 - i) Average monthly consumption of all residential customers whose average monthly consumption equals or falls below the average monthly consumption for all residential customers.
 - j) Average monthly consumption of all residential customers whose average monthly consumption exceeds the average monthly consumption for all residential customers.
 - k) Number of residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption equals or falls below the average monthly consumption for all residential customers.

- l) Number of residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption exceeds the average monthly consumption for all residential customers.
 - m) Average monthly consumption of those residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption equals or falls below the average monthly consumption for all residential customers.
 - n) Average monthly consumption of those residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption exceeds the average monthly consumption for all residential customers.
- A-4. The responses below are for the 12-month period from January through December of 2013:
- a) Number of electric residential customers billed and incurred consumption in 2013 is 556,604.
 - b) Annual kWh sales to all residential customers in part a) is 6,176,358,279 kWh.
 - c) Average monthly kWh for all residential customers in part a), calculated using the total kWh in part b) divided by the total billing periods for the customers in part a), is 1,216 kWh.
 - d) Number of residential customers who received assistance from a third-party agency and incurred usage in 2013 is 28,031 customers.
 - e) Annual kWh sales to residential customers who received assistance from a third-party agency in part d) is 365,885,555 kWh.
 - f) Average monthly kWh for all residential customers who received assistance from a third party agency in part d), calculated using the total kWh in part e) divided by the total billing periods for the customers in part d), is 1,344 kWh.
 - g) Number of residential customers whose average monthly consumption equals or falls below the average monthly consumption for all residential customers is 341,595.
 - h) Number of residential customers whose average monthly consumption exceeds the average monthly consumption for all residential customers is 215,009.

- i) Average monthly consumption of all residential customers whose average monthly consumption equals or falls below the average monthly consumption for all residential customers is 706 kWh.
- j) Average monthly consumption of all residential customers whose average monthly consumption exceeds the average monthly consumption for all residential customers is 1,877 kWh.
- k) Number of residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption equals or falls below the average monthly consumption for all residential customers is 13,486.
- l) Number of residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption exceeds the average monthly consumption for all residential customers is 14,545.
- m) Average monthly consumption of those residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption equals or falls below the average monthly consumption for all residential customers is 791 kWh.
- n) Average monthly consumption of those residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption exceeds the average monthly consumption for all residential customers is 1,857 kWh.

KENTUCKY UTILITIES COMPANY

CASE NO. 2014-00371

**Response to Alice Howell, Carl Vogel, and Sierra Club's Second Set of Data
Requests Dated February 6, 2015**

Question No. 5

Responding Witness: David S. Sinclair / Robert M. Conroy

Q-5. Reference Supplemental Response to Sierra Club 1-23. This response includes a series of email messages referencing attached files named as follows:

- “Customer Service Rate Case Pre-Planning Team - Proposed Tariff Revisions--DEH-04-07-14 - SEW-04-08-14 Response.docx”,
- “Customer Service Rate Case Pre-Planning Team - Proposed Tariff Revisions--DEH-04-07-14.docx”,
- “[http://home/projects/pprc/Shared%20Documents/Customer%20Service%20Rate%20Case%20Pre-Planning%20Team%20-%20Proposed%](http://home/projects/pprc/Shared%20Documents/Customer%20Service%20Rate%20Case%20Pre-Planning%20Team%20-%20Proposed%20Tariff%20Revisions.docx)”, and
- “[20Tariff%20Revisions.docx](http://home/projects/pprc/Shared%20Documents/Customer%20Service%20Rate%20Case%20Pre-Planning%20Team%20-%20Proposed%20Tariff%20Revisions.docx)”.

Significant portions of these attachments were redacted as nonresponsive to DR 1-23(c), which asked only about the CSR tariff. Please provide copies of these attachments with portions relating to the standard residential service and residential time-of-day tariffs unredacted.

A-5. See attached.

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Item	LOB	Tariff Description and Sheet No.	Proposed Revision	Volume / Customer Impact	Sponsor
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4	E	LG&E / KU- CSR10 & CSR30 = Sheet # 50 and #51 - Curtailable Service Rider	Under the CSR rider, a customer is provided a monthly credit for allowing LGE/KU to curtail their load. In some months the credit a customer receives does not allow LGE/KU to recover the cost to serve. Discount does not reflect the intrinsic value and should be adjusted and more closely align with <u>"call option" valuation.</u>	KU CSR10 – 3 KU CSR30 – 2 LGE CSR10 – 1 LGE CSR30 - 1	Conroy

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Item	LOB	Tariff Description and Sheet No.	Proposed Revision	Volume / Customer Impact	Sponsor
12	E	LG&E Electric / KU – Sheet # 100	<p>Refine “residence” definition – Does it include houseboat and trailer homes (which could be permanent or seasonal)?</p> <p>This whole sheet needs to be rewritten. It is out of date and contradictory. This was written in the days of traditional homes but today this has expanded as people are remodeling and using it as a home – there is more than just traditional “single family units” like a house, townhome, apt. The tariff doesn’t say this has to be permanent so as mentioned above this opens the door to RV’s, camps, boats etc. Sheet 45 allows for a temp suspension on a residence so that validates the concept of a non-permanent/seasonal residence.</p> <p>Revise # 2 and condense to home office. . It seems all new homes are equipped with an office. Remove verbiage about musicians and artists.</p> <p># 5 says where both residential and commercial classes are supplied through a single meter, such combined service is billed at the appropriate nonresidential rate but #6 says if Barns, etc. are located at such a distance from the residence that it is impractical to serve through the residential meter - to me this has always been contradictory. Detached garages that go through the single meter are billed on residential rate but according to #5 this is incorrect.</p>		Aria

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20		New Tariff	Do we want or need to offer residential and general service customers one or more time differentiated rates?		Huff

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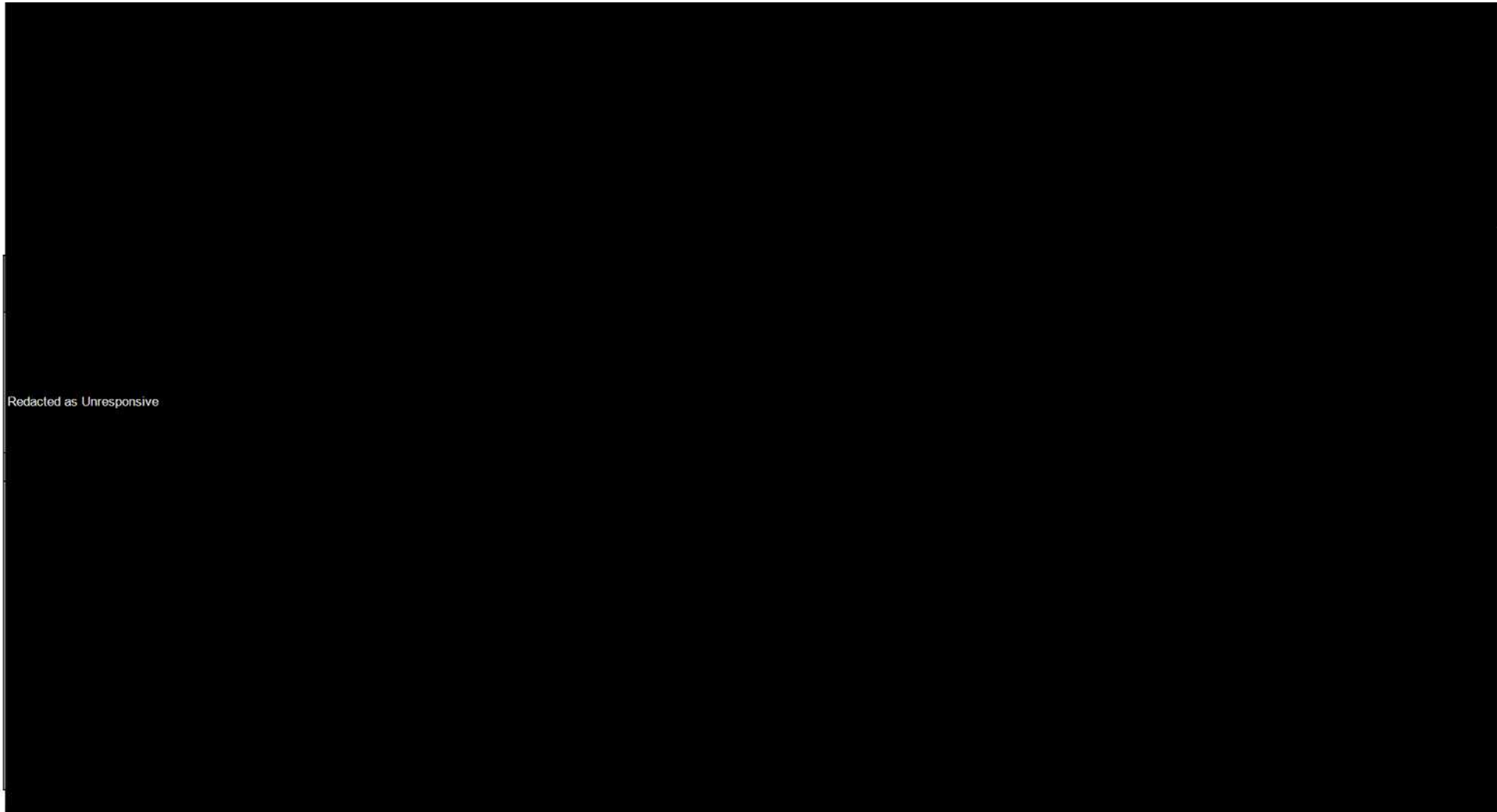
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19		New Tariff	Do we want or need to offer residential and general service customers one or more time differentiated rates?	NA	Huff

Item	LOB	Tariff Description and Sheet No.	Proposed Revision	Volume / Customer Impact	Sponsor
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22	E	Sheet #5 – RS	Add language (matching GS) to only allow secondary service		Reinert
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42			Create 3 Phase residential tariff		Reinert
43			Restrictions on RS and GS customer use of welding and instantaneous water heating or create RS/GS demand tariff		Reinert

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KENTUCKY UTILITIES COMPANY

CASE NO. 2014-00371

**Response to Alice Howell, Carl Vogel, and Sierra Club's Second Set of Data
Requests Dated February 6, 2015**

Question No. 6

Responding Witness: Robert M. Conroy

- Q-6. If the basic electric service charge for the residential class remained at \$10.75, and the Company is granted the full amount of its requested revenue increase, what would the volumetric energy rate be?
- A-6. The Company does not agree with the hypothetical scenario of leaving the basic service charge at its present level. The Company is proposing basic service charges and volumetric rates consistent with its cost of service studies. With that said, for a residential electric customer, if the basic service charge remained at \$10.75, the energy charge would need to be \$0.08661 per kWh in order to collect the same allocated revenue requirement.