

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS)	
AND ELECTRIC COMPANY FOR AN)	CASE NO. 2014-00372
ADJUSTMENT OF ITS ELECTRIC)	
AND GAS RATES)	

**DATA REQUESTS OF
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION**

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to Kentucky Cable Telecommunications Association (“KCTA”), 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, KCTA, 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 KCTA 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 KCTA 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 KCTA, 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

1. Please explain fully and in detail why KCTA did not move to intervene in Kentucky Public Service Commission Case No. 2012-00222, which is the proceeding in which LG&E's current Cable Television Attachment Charge was approved by the Commission.
2. Please confirm that KCTA has intervened in every rate case in which LG&E has proposed changing a pole attachment rate except Case No. 2012-00222.
 - a. If the answer is anything other than yes, please list each case number in which KCTA did not intervene.

Ms. Kravtin

3. Please provide all schedules in electronic format with cells intact and all workpapers, source documents, and electronic spreadsheets used in the development of Ms. Kravtin's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.
4. Is Ms. Kravtin aware of Kentucky's statutory establishment of the filed rate doctrine at KRS 278.160(2):

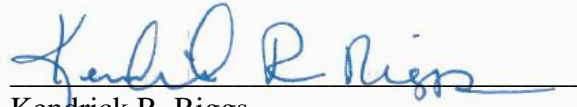
No utility shall charge, demand, collect, or receive from any person a greater or less compensation for any service rendered or to be rendered than that prescribed in its filed schedules, and no person shall receive any service from any utility for a compensation greater or less than that prescribed in such schedules.

 - a. Does Ms. Kravtin agree that the Companies are required to charge, demand, collect, and receive only the pole-attachment charges approved by the Commission?
5. Explain the relevance of her calculation of KCTA's preferred Rate CTAC charge based on the test year from LG&E's 2012 base-rate case (Case No. 2012-00222)?
6. Please see page 36 of Ms. Kravtin's testimony.
 - a. Does Ms. Kravtin acknowledge that she has no knowledge or evidence of what LG&E's actual pole-attachment methodology was prior to Administrative Case No. 251?
 - b. Does Ms. Kravtin therefore further acknowledge that her assertions about LG&E's pole-attachment methodology prior to Administrative Case No. 251 are based solely on what Ms. Kravtin believes is "reasonable to assume"?

7. Provide a copy of the direct testimony filed by Ms. Kravtin in the following proceedings:
 - a. 2013 – Before the Virginia State Corporation Commission regarding Northern Virginia Electric Cooperative.
 - b. 2012 – Before the State of New Hampshire Public Utilities Commission in the Time Warner dispute with Public Service Company of New Hampshire.
 - c. 2011 – Before the Public Utilities Commission of Ohio regarding the AEP Ohio proceeding.
 - d. 2002 – Before the Federal Energy Regulatory Commission in the Transcontinental Gas Pipeline Corporation proceeding.
 - e. 2001 – Before the Federal Energy Regulatory Commission in the Transcontinental Gas Pipeline Corporation proceeding.
 - f. 2000 – Before the Federal Energy Regulatory Commission in the Northern Border Pipeline Company.
 - g. If not provided in response to item (2) provide any other testimony that was submitted by Ms. Kravtin in an FERC proceeding.
8. If not provided in response to Question No. 7 above, please provide any other testimony that was submitted by Ms. Kravtin in any proceeding in which she addressed pole attachment charges.
9. If not provided in response to Question No. 7 above, please provide any other testimony that was submitted by Ms. Kravtin in any proceeding in which she addressed carrying charge calculations.
10. Provide a detailed definition of “minor appurtenances” as used on page 19 of Ms. Kravtin’s Direct Testimony.
11. Provide a list of items that Ms. Kravtin considers to be “minor appurtenances”.
12. Provide evidence that supports the assumption that “minor appurtenances” represent 15 percent of pole costs on LG&E’s system.
13. Provide any empirical data or calculations that support the derivation of a 15 percent factor for “minor appurtenances”.
14. Provide the formulas and the mathematical derivation of the formulas used by Ms. Kravtin to calculate the Sinking Fund Factor and the Income Tax Factor in Attachment 2 of her testimony.

Dated: March 23, 2015

Respectfully submitted,




Kendrick R. Riggs
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000
Fax: (502) 627-8722
kendrick.riggs@skofirm.com

Allyson K. Sturgeon
Senior Corporate Attorney
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
allyson.sturgeon@lge-ku.com

Counsel for Louisville Gas and Electric Company

CERTIFICATE OF COMPLIANCE

This is to certify that Louisville Gas and Electric 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 Louisville Gas and Electric Company