

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

In the Matter of:

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

**KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S
SUPPLEMENTAL DATA REQUESTS TO
LOUISVILLE GAS AND ELECTRIC COMPANY**

The Kentucky Cable Telecommunications Association, pursuant to the Commission's December 12, 2014 Order setting forth the procedural schedule in this case, hereby submits its Supplemental Data Requests to Louisville Gas and Electric Company ("LG&E"), in accordance with the following Definitions and Instructions.

DEFINITIONS

1. The terms "you," "your" and "the Company" refer to Louisville Gas and Electric Company.
2. The term "KCTA," refers to the Kentucky Cable Telecommunications Association.
3. The term "Commission" refers to the Kentucky Public Service Commission.
4. "Poles" means utility poles in your electric distribution network in Kentucky that you own or control.
5. "Pole rates" mean the annual charges for use of your poles by any other entity.

INSTRUCTIONS

1. In answering these Data Requests, please furnish all information that is known or available to you, regardless whether the information is possessed directly by you or your agents,

employees, representatives, or investigators, or by your attorneys or their agents, employees, representatives, or investigators.

2. Please identify at the end of each answer the person or persons most knowledgeable about such response and the person or persons responsible for the preparation of such response.

3. If any information responsive to these Data Requests is withheld, identify the Data Requests as to which such information is withheld and the reason(s) for withholding it.

4. For any information that you claim is unavailable, state why it is unavailable. If you cannot respond to the Data Request precisely as it is stated, provide any information that is available that would respond to the Request at a level of detail different from that specified herein.

5. KCTA requests that you produce all documents on which you relied or to which you referred in responding to these Data Requests.

6. For all data you produce, please produce it in its native electronic format (e.g., all Microsoft Excel spreadsheets should be produced in Excel format).

7. Unless otherwise stated, provide requested data as of the following dates: March 31, 2012, and October 31, 2014 and if different, the date conforming to Conroy Exhibit M5 from Case No. 2012-00222. To the extent that you rely on forecasted data to support your pole attachment rates, please also provide data for the forecasted time period ending June 30, 2016.

SUPPLEMENTAL DATA REQUESTS

2-1. Provide all data in native electronic format to support the Account 593 Subaccount Detail summary figures provided in your response to KCTA's Data Request Number 1-19.

2-2 To the extent not otherwise clearly identified in the Subaccount Detail data provided in response to request 2-1, identify each and every credit item associated with a regulatory asset, including, but not limited to the Winter Wind Storm Regulatory Asset (as identified in LG&E's attachment to its response to KCTA's Request 1-20 in Case No. 2009-00549).

2-3. In response to KCTA Request Number 1-1, LG&E provided Conroy Exhibit M5 from Case No. 2012-00222. Page 1 of Conroy Exhibit M5 provides data as of October 31, 2009. Please confirm that this is a typographical error and provide the accurate date for the data provided.

2-4. Provide LG&E's total labor expenses from LG&E's general ledger for all accounts as of March 31, 2012 and October 31, 2014, and if different, the date conforming to Conroy Exhibit M5 from Case No. 2012-00222.

2-5. Provide all records that reflect LG&E's investment in minor appurtenances. For purposes of this question, minor appurtenances include, but are not limited to, aerial cable clamps, pole top pins, and all other appurtenances and hardware that are not poles or major appurtenances.

2-6. Are the costs of minor appurtenances (as defined in Request 2-5) excluded from the LG&E pole-cost figures used in Conroy Exhibit M5?

2-7. If the answer to the preceding request is anything other than an unqualified yes, please provide data to support that response, including identification of the specific account or subaccount the costs of minor appurtenances have been booked to, and the amounts of such costs booked to the identified account or subaccount.

2-8. According to Mr. Seelye's Rebuttal Testimony in Case No. 2009-00549, the costs for aerial cable clamps, pole top pins "and other such items that relate to connecting conductors to poles" are recorded by LG&E in Account No. 365 and No. 368. Please provide evidence that this is the case.

2-9. For each of the following items, indicate whether LG&E has investment for the items in Account 364:

Anchors,

Head arms,

Strain insulators,

Pole plates,

Excavation and backfill, including disposal of excess material,

Extension arms,

Foundations,

Guards,

Insulator pins and suspension bolts,

Paving,

Permits for construction,

Pole steps and ladders,

Racks,

Railings,

Reinforcing and stubbing,

Settings,

Shaving, painting, gaining roofing, stenciling and tagging,

2-10. For each of the items in the previous data request for which LG&E has investment in Account 364, please indicate whether all of the investment in such items is included in any or all of the following subaccounts: “brackets”, “cross arms”, “fence”, “guy” and “platforms”.

2-11. Are the “installed cost” figures on page 1 of Conroy Exhibit M5 based on gross or net investment?

2-12. With regard to Conroy Exhibit M5, please explain (separately for each item) the basis for LG&E to have applied the “rate of return,” “depreciation sinking fund,” and “income tax” components of its carrying charge, each of which contains inputs under regulatory and/or accounting practice based on net book costs, to gross pole costs without either netting those figures to reflect depreciation and accumulated deferred taxes or applying an adjustment for the ratio of net to book costs. As part of this response, provide any and all support for LG&E’s application for inputs based on net book costs to gross investment cost figures.

2-13. With regard to Conroy Exhibit M5, and comparing to the comparable exhibit in Case No. 2009-00549, please provide a detailed explanation (separately for each item) along with supporting cost and continuing property records data, of the reduction in quantity of 40 foot poles from 61,023 poles to 59,477 poles and the corresponding increase in total installed costs from \$25,998,372 to \$27,701,656.

2-14. With regard to responses to KCTA Request Number 1-6 to 1-9, please provide a detailed explanation (separately for each item) along with supporting cost data, of the increase in

average bare pole cost between March 31, 2012 and October 31, 2014, for 40 and 45 foot poles, respectively.

2-15. Please provide the data in native electronic format for Account No. 593004 from page 3 of Conroy Exhibit M5.¹

2-16. What is the number of kilowatt hours used by a residential customer on average per year?

2-17. What is the total number of kilowatt hours used by all residential customers per year?

2-18. What was the total percentage revenue increase for LG&E's electric service according to Case No. 2009-00549?

2-19. What was the total percentage revenue increase for LG&E's electric service according to Case No. 2012-00222?

2-20. What is the total percentage revenue increase for electric service that LG&E requests in the current rate case, Case No. 2014-00372?

2-21. Please provide transcripts of any testimony in Case No. 2012-00222 in which the actual pole attachment rates and/or methodology regarding pole attachment rates were discussed before the Commission.

2-22. Please provide LG&E's gross distribution plant investment.

2-23. Please provide LG&E's accumulated depreciation reserve for distribution plant.

2-24. Please provide the amount in LG&E Account 190.

2-25. Please provide the amount in LG&E Accounts 281-283.

¹ In response to KCTA's Request No. 1-1 to Kentucky Utilities Company, Kentucky Utilities Company produced the data for Account 593004 in native format. LG&E did not produce this information.

2-26. Please provide the amount in LG&E Account 408.1.

2-27. Please provide the amount in LG&E Account 409.1.

2-28. Please provide the amount in LG&E Account 410.1.

2-29. Please provide the amount in LG&E Account 411.4.

2-30. Please provide the amount in LG&E Account 411.1.

2-31. Please provide the embedded costs in LG&E Accounts 365 and 369.

2-32. According to Mr. Seelye's Rebuttal Testimony in Case No. 2009-00549, LG&E has been using a levelized rate since the early 1980s and including Case No. 90-158. Please provide any and all data to support that statement, including, but not limited to, LG&E's pole rate calculations and supporting work papers pertaining to the early 1980s.

2-33. Please identify the basis of the Company's CATV pole attachment charge prior to the early 1980s.

2-34. Please identify any and all other jurisdictions of which LG&E is aware where the "levelized carrying charge approach," as applied by LG&E, has been used to determine a CATV pole attachment rate, including the use of a sinking fund methodology for calculating depreciation and a rate of return based on net book cost, has been applied, along with any supporting documentation.

2-35. Please indicate whether there are vintages of pole plant remaining in service that are older than 35 years. If the answer is anything other than an unqualified no, please identify the percentage of LG&E's pole plant in service associated with these older vintages of plant.

Respectfully submitted,

/s/ Laurence J. Zielke
Laurence J. Zielke
Janice M. Theriot
Zielke Law Firm, PLLC
1250 Meidinger Tower
462 South 4th Street
Louisville, KY 40202
(502) 589-4600

Gardner F. Gillespie (*application for pro hac vice admission pending*)
Amanda M. Lanham (*application for pro hac vice admission pending*)
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW
Suite 100
Washington, DC 20006
(202) 747-1900
ggillespie@sheppardmullin.com
alanham@sheppardmullin.com

**ATTORNEYS FOR THE KENTUCKY CABLE
TELECOMMUNICATIONS ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Kentucky Cable Telecommunications Association's Supplemental Data Requests to Louisville Gas & Electric Company has been served on all parties of record via hand delivery, facsimile, or electronically this 6th day of February, 2015.

/s/ Laurence J. Zielke
Laurence J. Zielke
Janice M. Theriot