# LOUISVILLE GAS AND ELECTRIC COMPANY

## CASE NO. 2014-00372

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

#### **Question No. 79**

#### **Responding Witness: Counsel**

- Q-79. 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-79. 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. To the extent responsive 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 a list of responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response and can be reviewed upon request.