

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

In the matter of: : CASE NO. 2014-00372

THE APPLICATION OF LOUISVILLE GAS & :  
ELECTRIC COMPANY FOR AN ADJUSTMENT :  
OF ELECTRIC AND GAS RATES :

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**FIRST REQUEST FOR INFORMATION OF  
KENTUCKY SCHOOL BOARDS ASSOCIATION**

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The Kentucky School Boards Association (KSBA) prospective intervener in this action, and in effort to comply with the procedural schedule established, respectfully requests the applicant, Louisville Gas & Electric Company, to respond to the First Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

- A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.
- B. Restate the information inquiry immediately preceding each response.
- C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.
- D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KSBA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

#### Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means Louisville Gas and Electric Company or the witness, as the context requires.

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which Louisville Gas and Electric Company or its officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.

3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals

and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

(a) are now or were formerly in your possession, custody or control; or

(b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts

of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

9. The term "warranty company" means any company, individual, entity or other organization that engages in the business of providing or arranging for services on utility lines, including but not limited to gas, electric, water or sewer in a consumers home, apartment or other place of abode.

### **FIRST REQUEST OF INFORMATION OF KSBA**

1. Please provide copies all calculations, work papers and any other supporting documents including but not limited to load research reports used to develop the Allocation Factor Tables in Exhibits MJB-3 and MJB-9.
2. Please provide copies of all available peak day load profiles for any school accounts recorded in the last five years.
3. Please provide a copy of all class loss factors used in the development of MJB-3, MJB-8 and MJB-9 and any supporting studies and documentation.
4. Please confirm that line 10 Winter Peak Period Costs of MJB-4 calculates to 18.33 % rather than 34.10 % per the expressed formula.
5. Please confirm that line 12 Sumer Peak Period Costs of MJB-4 calculates to 46.67 % rather than 30.91 % per the expressed formula.

6. Please provide the calculation of the winter (2432) and summer (1308) peak hours shown on MJB-4.
7. Please provide load profiles for each monthly peak day as listed on the 2013 FERC Form 1 page 401b provided in Tab 41 for each company.
8. Please provide copies of all source documents including but not limited to bill frequencies used in the development of Witness M. J. Blake’s Schedule M-1.3.
9. With reference to Mr. Conroy’s Schedule N please provide the number of school accounts (SIC 821) in each of the kwh cohorts for Rates GS and in each of the kwh/load factor cohorts for Rates PS-secondary and TODS.
10. Please provide MJB-10 for each Rate Schedule.
11. Please provide a 2013 or most recent available annual bill frequency for SIC 821 ELEMENTARY AND SECONDARY SCHOOLS for Rates GS, PS-secondary, PS-primary and TODS.
12. Please provide the number of employees budgeted by year in each five-year budget period from 2005 through 2014 as follows separately by generation, transmission, (gas distribution-LGE), electric distribution, customer service, administrative and total:

**Generation**

Year	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
2005	500	505	510	515	520								
2006		505	495	495	500	500							
2007													
2008													
2009													
2010													
2011													
2012													
2013													
2014													
2015													
2016													
2017													

13. Please provide the actual number of employees as follows by year from 2005 through 2014:

Year	Generation	Transmission	Distribution	Customer Service	Administrative	Total
2005						
2006						
2007						
2008						
2009						
2010						
2011						
2012						
2013						
2014						
2015						
2016						
2017						

14. Please provide the average annual wage increase provided employees for the last ten years.
15. Please explain when and why the company began advising customers of their best available rate option.
16. Please provide a copy of FERC Form 1 page 401b for the years 2004 – 2012.
17. Please explain why the company does not offer a sports field rate schedule in its tariff.
18. Please explain why it is appropriate to charge sport fields the same rate that recovers peak service costs as other customers whose loads are also present during daytime hours.
19. Please describe and provide the cost savings provided customers from harmonizing the tariffs of KU and LGE.
20. Please provide the sales volume, number of customers and billing demands for each rate class for the years 2005 through 2014.
21. Please provide the 2014 monthly system sales volumes, peaks, dates and times in the same format as FERC Form 1 page 401b
22. Please reconcile the below Witnesses Thompson and K. Blake’s stated headcount increases since April, 2012 to the levels provided in Attachment to Filing Requirement 807 KAR 5:001 Section 16(7)(h)(9):

Generation	50
Transmission	19
Distribution	53

Gas Distribution	42
Customer Service	93
IT	53
Adm. Services	19

Respectfully submitted,

/s/ Matthew Malone  
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Counsel for the Petitioner,  
**KENTUCKY SCHOOL BOARDS ASSOCIATION**

### **CERTIFICATE OF SERVICE**

It is hereby certified, this the 8<sup>th</sup> day of January, 2015, that the attached First Request for Information of KSBA is a true and correct copy of the document being filed in paper medium; that the electronic filing has been transmitted to the Commission on January 8, 2015; that there are currently no parties that have been excused from participation by electronic service; that an original and one copy of this document is being mailed to the Commission for filing on January 8, 2015; and that an electronic notification of the electronic filing will be provided to all counsel listed on the Commission's service list in this proceeding.

/s/ Matthew Malone  
ATTORNEY FOR KSBA