

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

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The Kentucky School Boards Association (KSBA) intervener in this action, respectfully requests the applicant, Louisville Gas & Electric Company (the “Company”), to respond to the Supplemental 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.

#### **SUPPLEMENTAL REQUEST OF INFORMATION OF KSBA**

1. Please provide copies of all available peak day load profiles for rate schedules GS, AES, PS-sec and TODS recorded in the last five years in the same format as the Company's response to KSBA Question No. 2 (First Request for Information) and include the rate schedule for each account.
2. Please provide copies of all available peak day load profiles for any industrial accounts recorded in the last five years and include the rate schedule for each account.
3. Please provide copies of all available peak day load profiles for any commercial accounts recorded in the last five years and include the rate schedule for each account.
4. With regard to the response to KSBA Question No. 2 (First Request for Information) please provide the rate schedule and description (i.e. elementary, middle, high school, office, garage, etc.) for each listed account.
5. Please provide in Excel format an hourly load profile for the Company's monthly peak as shown on the 2014 Form page 401 provided in response to KSBA Question No. 23 (First Request for Information).
6. Please provide the combined LGE-KU monthly system peaks in the FERC Form 1 page 401 format and hourly profiles in Excel format for each peak day shown for the years 2004-2014.

7. With reference to the response to KU and LGE PSC 2-60 KUElectCOSS tab “Billing Det” please provide all work papers including calculations, derivations and source data for each item listed in columns shown on the spreadsheet.
8. Please provide the Company’s current estimate of expected percentage revenues increases by rate class to be passed through the ECR, DSM and FAC mechanisms for the next five years.
9. With regard to Mr. Conroy’s response to KSBA Question No. 20 (First Request for Information) please describe the facilities that would be idled.
10. With regard to Mr. Conroy’s response to KSBA Question No. 20 (First Request for Information) please explain how an off-peak secondary load idles generation, transmission and primary distribution facilities that are sized and otherwise used to serve peak hour load.

Respectfully submitted,

*Matt Malone*

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Matthew R. Malone  
William H. May, III.  
Hurt, Deckard & May PLLC  
127 West Main Street  
Lexington, Kentucky 40507  
(859) 254-0000 (office)  
(859) 254-4763 (facsimile)  
[mmalone@hdmfirm.com](mailto:mmalone@hdmfirm.com)  
[bmay@hdmfirm.com](mailto:bmay@hdmfirm.com)

Counsel for the Petitioner,  
**KENTUCKY SCHOOL BOARDS ASSOCIATION**

**CERTIFICATE OF SERVICE**

It is hereby certified, this the 6<sup>th</sup> Day of February 2015, that the attached Supplemental 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 February 6, 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 February 6, 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.

*Matt Malone*

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ATTORNEY FOR KSBA