

Application of Louisville Gas and Electric Company
For an Adjustment of its Electric Rates
Case No. 2014-00372
Attorney General's Supplemental Requests for Information
PUBLIC VERSION

1. Please reference the response to AG 1-2. Please provide any explanation or other information the company may have to explain the approximate 148.56% increase in uncollectible expense for the residential class in 2014 compared with 2013.
2. Reference AG 1-2 and AG 1-3(a). Explain why uncollectible expense has increased significantly more than late payment charges.
3. Reference AG 1-2 and AG1-3(d). Confirm that while LGE seeks \$4,028,000 in uncollectible expense in the forecasted test period, the uncollectible average from 2010-2014 is \$3,730,184 and from 2011-2014 is \$3,186,619.
4. Reference response to AG 1-19. For each title listed in the response please indicate if the position will be at a plant or headquarters. For each position that will be located at a generation plant, please indicate which plant the position will be assigned to.
5. Reference the response to AG 1-14.
 - a. Provide information as to if there are any updates by FERC on the pending North American Energy Standards Board submission to change the natural gas industry scheduling process.
 - b. Please provide a copy of the NERC Reliability Guideline: Generating Unit Winter Weather Readiness-Current Industry Practices.
 - c. When will the Companies have these processes formalized and standardized across the fleet?
6. Reference the response to AG 1-18. Provide the compensation and employee benefits surveys and studies which the Companies rely upon for review.
7. Please reference the response to AG 1-80. Provide detailed information for each legal settlement amount contained in the chart including but not limited to case number, case name, nature of the legal claim, and reason for settlement.
8. Reference the response to AG 1-94. Explain the large increase in expense for advertising category "Info/Safety 909" between 2011 and 2014 and also the reason for the forecast decrease in expense between 2014 and the test year.
9. Reference the response to AG 1-94. Explain the large increase in expense for advertising category "Promotional 913" between 2013 and 2014 and also the reason for the forecast increase in expense between 2014 and the test year.
10. Reference response to AG 1-94. Explain the decrease in expense for advertising category "Institutional 930" between 2014 and the test year.

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10. Reference response to AG 1-94. Explain the decrease in expense for advertising category "Institutional 930" between 2014 and the test year.
11. Reference the response to AG 1-94. Provide a description of each category of advertising expense shown on the attachment to the response.
12. Reference the response to AG 1-155. For the period 2012, 2014, the base year and the test year, please provide the title and number of positions by generating station, at headquarters and in total.
13. Reference the response to AG 1-157. With respect to the 40 positions at the Cane Run generating stations that are scheduled to be retired, which are expected to be placed elsewhere in the generation fleet, please provide the position title and number of positions for each title that comprise the 40 employees.
14. Reference the response to AG 1-157. With respect to the 40 positions at the Cane Run generating stations that are scheduled to be retired, which are expected to be placed elsewhere in the generation fleet, please provide which plant the employee will be assigned to in the test year
15. Reference the response to AG 1-173. Provide the data attached to the response as an Excel spreadsheet, with all formulas intact and fully accessible.
16. Reference the response to AG 1 -173. Is the rate case expense level of \$894,414 for LGE-Electric the actual level of all rate case expenses for the electric rate case? If not, please provide the actual booked amount for case 2012-00222.
17. Reference the response to AG 1 -173. Is the rate case expense level of \$284,805.71 for LGE-Gas the actual level of all rate case expenses for the gas rate case? If not, please provide the actual booked amount for case 2012-00222.
18. Reference the response to AG 1-206. Provide the assumed cost of gas and coal delivered at each unit to determine the dispatch order and the associated average unit heat rate.
19. Reference the response to AG 1-206. Provide the assumed cost of gas and coal delivered at each unit to determine the dispatch order and the associated average unit heat rate.
20. Reference Paul W. Thompson's testimony on page 23, lines 15-17. For generation operations, for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.
21. Reference Paul W. Thompson's testimony on page 31, lines 5-15. For transmission operations, for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.

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22. Reference Paul W. Thompson's testimony on page 42. For electric distribution operations, by company (i.e. LGE, KU, and LKS) for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.
23. Reference Paul W. Thompson's testimony on page 48. For gas distribution operations, by company (i.e. LGE, KU, and LKS) for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.
24. Reference Paul W. Thompson's testimony on page 62. For customer services, by company (i.e. LGE, KU, and LKS) for 2012, 2014, the base year and test year, please provide a list of position titles and the number of positions for each title.
25. Reference Direct testimony of Kent Blake at page 9. Provide any and all studies performed by or for the Company regarding the demographics of the Company's workforce.
26. Reference CAC 1-1 in Case No 2014-00371. Please provide the same information in the same format for LGE.
27. Reference CAC 1-5 in Case No 2014-00371. Please provide the same information in the same format for LGE.
28. Reference CAC 1-7 in Case No 2014-00371. Please provide the same information in the same format for LGE.
29. Reference CAC 1-9 in Case No 2014-00371. Please provide the same information in the same format for LGE.
30. Reference CAC 1-10 in Case No 2014-00371. Please provide the same information in the same format for LGE.
31. Provide any policy LGE has regarding the use of coal combustion residue – specifically coal ash – for beneficial reuse.
32. Provide a list of projects where LGE coal ash has been or will be used in a beneficial reuse project.
33. With the level of certainty in regards to coal ash and beneficial reuses, does LGE intend to proactively identify and secure beneficial reuse projects for its coal ash?
34. On or about September 17, 2014, a leak occurred in an LG&E gas main in Oldham County, Kentucky, that led to an apparent catastrophic failure of the gas main. News

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reports indicated that as a result of the gas main's failure, several thousand gas customers were left without service for several days.

- a. Identify any and all claims occurring as a result of the gas main's failure, including any potential CERCLA claims.
- b. Identify any and all corrective measures the company has taken to repair the gas main failure in Oldham County.
- c. If the type of defect that the company believes led to the failure of the gas main in Oldham County has been found in any portions of the company's transportation and/or distribution systems, please identify what measures the company is taking to address any such issues.
- d. Identify any and all insurance coverage that provided compensation for any claims incurred as a result of the apparent gas main failure.
- e. Identify any and all insurance coverage that provided compensation for any repairs of any other defects or potential defects of a similar nature that may have been found elsewhere on the company's transportation and/or distribution system.
- f. Identify any and all ratepayer impacts, including any additional sums to be funded through the AMRP.

35. Reference the reliability study provided in response to Sierra Club 1-26b and please provide the following information:

a. **[BEGIN CONFIDENTIAL]**

b.

c.

d.

e.

[END CONFIDENTIAL]

36. As a non-RTO transmission operator, does LG&E have any obligation under the FERC Order 1000 policies to allow competitive transmission owners to construct and build transmission facilities in the LG&E/KU control area for cost recovery under the LG&E/KU Open Access Transmission Tariff?

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37. How does LG&E account for use of its transmission system by both retail and wholesale customers? For example are retail customers Network customers under the LG&E Open Access Transmission Tariff (OATT)?
38. Regarding the LG&E/KU OATT, please provide a list of all transmission dependent wholesale customers connected to the LG&E transmission facilities and indicate the type of transmission service provided to each wholesale customer above.
39. Please provide the criteria used to determine LG&E operating reserve and spinning reserve requirements.
40. Reference the response to PSC 2-42. Do the Companies plan on conducting a formal update of the analyses Avera and McKenzie presented in their direct testimony concerning the DCF analysis in the application? Please explain the answer in full detail.
41. Provide an estimated rate case expense for the pending case.
42. Provide actual rate case expenses that have accrued thus far in the case.