

Verification

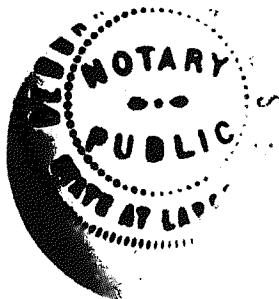
The undersigned, Daniel Frockt, being duly sworn, certifies that he is the Chief Financial Officer for the Louisville/Jefferson County metro Government, and that the Responses to Requests for Information contained herein are true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry.

Daniel Frockt  
(name)

STATE OF KENTUCKY            )  
  )  
COUNTY OF Jefferson        )

SUBSCRIBED AND SWORN to before me by (name) in the aforesaid state and county on the 7 day of April, 2017.

My commission expires 9/6/2020



Deborah M. Summers  
Notary Public

Electronic Application of Louisville Gas and Electric Company for a Declaratory Order  
Regarding the Proper Method of Municipal Franchise Fee Recovery  
Case No. 2016-00317  
Louisville Metro Responses to LG&E

QUESTION NO. 1

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Provide the basis of support for Councilman Blackwell's assertion that the Council does not believe that collecting a fee from customers is lawful. Produce all documents of any kind that support Councilman Blackwell's assertion.

RESPONSE:

Objection on the basis that the question asks for information that is subject to the attorney-client privilege. Without waiving this objection, see the legal arguments supplied by Louisville Metro in Case Nos. 2016-00317 and 2016-00347.

RESPONDING WITNESSES:

Counsel for Louisville Metro

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QUESTION NO. 2

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Provide all notes, data, and workpapers prepared by, or on behalf of, Councilman Blackwell in connection with this proceeding, including workpapers used to generate any and all tables and exhibits for his assertion: "By charging a fee based on usage of gas, the proper amount of the fee can be allocated to each individual LG&E gas customer, regardless of their location in the LG&E service territory." If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Councilman Blackwell, please provide an electronic version of those documents with all formulas intact.

RESPONSE:

Objection on the basis that the question asks for information that is subject to the attorney-client privilege. Without waiving this objection, see the current franchise agreement, as well as the agreements provided in response to Louisville Metro responses to PSC 1-2.

RESPONDING WITNESS:

Counsel for Louisville Metro, Rick Blackwell

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QUESTION NO. 3

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Provide the basis of support for Councilman Blackwell's assertion: "Those customers located in the satellite cities receive all the same benefits from the franchise fee as those customers located outside the satellite cities, except only one of those groups is actually paying for the benefits received." Produce all documents of any kind that support Councilman Blackwell's assertion.

RESPONSE:

See the Affidavit of Doug Hamilton, Exhibit 5 to the Louisville Metro Amended Complaint in Case No. 2016-00347. Franchise fee revenue is added to the Louisville Metro general fund, from which many of the benefits provided by the City are funded. Additionally, see the Louisville Metro response to PSC 1-4.

RESPONDING WITNESS:

Rick Blackwell, Daniel Frockt