

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

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>LOUISVILLE GAS AND ELECTRIC</b>	)	
<b>COMPANY FOR A DECLARATORY ORDER</b>	)	<b>CASE NO. 2016-00317</b>
<b>REGARDING THE PROPER METHOD OF</b>	)	
<b>MUNICIPAL FRANCHISE FEE RECOVERY</b>	)	

**DATA REQUESTS OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**PROPOUNDED TO LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT**

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to Louisville/Jefferson County Metro Government (“Louisville Metro”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on February 27, 2017.

**Instructions**

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, Louisville Metro, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if Louisville Metro receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If Louisville Metro objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of Louisville Metro, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

## Data Requests

### Councilman Blackwell

1. Provide the basis of support for Councilman Blackwell's assertion that the Council does not believe that collecting a fee from customers is lawful.<sup>1</sup> Produce all documents of any kind that support Councilman Blackwell's assertion.
2. 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."<sup>2</sup> 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.
3. 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."<sup>3</sup> Produce all documents of any kind that support Councilman Blackwell's assertion.

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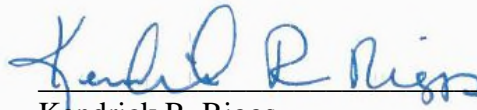
<sup>1</sup> Blackwell Testimony at 2.

<sup>2</sup> Blackwell Testimony at 2.

<sup>3</sup> Blackwell Testimony at 3.

Dated: March 24, 2017

Respectfully submitted,



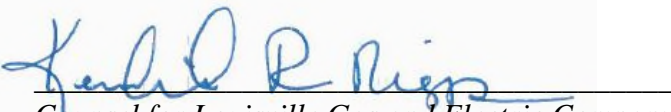
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*Counsel for Louisville Gas and Electric Company*

**CERTIFICATE OF COMPLIANCE**

This is to certify that Louisville Gas and Electric Company's March 24, 2017 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 24, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six copies, in paper medium, of the Data Requests are being mailed by first class United States mail, postage prepaid, to the Commission on March 24, 2017.



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*Counsel for Louisville Gas and Electric Company*