

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

In the Matter of:

APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN)	
ADJUSTMENT OF ITS ELECTRIC RATES)	CASE NO. 2016-00370
AND FOR CERTIFICATES OF PUBLIC)	
CONVENIENCE AND NECESSITY)	

**SIERRA CLUB, ALICE HOWELL, AND CARL VOGEL’S RESPONSES AND
OBJECTIONS TO KENTUCKY UTILITIES COMPANY’S DATA REQUESTS**

Intervenors Sierra Club, Alice Howell, and Carl Vogel (collectively “Sierra Club”) hereby submit their responses and objections to Kentucky Utility Company’s (“KU” or “the Company”) Data Requests, dated March 17, 2017.

GENERAL OBJECTIONS

- A. Sierra Club objects to Requests that are not relevant to the above referenced proceedings.
Kentucky Rule of Evidence 401.
- B. Sierra Club objects to Requests that are not “reasonably calculated to lead to the discovery of admissible evidence.” Kentucky Civil Rule 26.02(1).
- C. Sierra Club objects to Requests that are overly broad, unduly burdensome, oppressive, or calculated to take Sierra Club and its staff away from normal work activities, and require them to expend significant resources to provide complete and accurate answers.
Kentucky Civil Rule 26.02.

- D. Sierra Club reserves all of its evidentiary objections or other objections to the introduction or use of any response at any hearing in this action.
- E. Sierra Club does not, by any response to any Request, waive any objections to that Request.
- F. Sierra Club does not admit the validity of any legal or factual contention asserted or assumed in the text of any Request.
- G. Sierra Club reserves the right to assert additional objections as appropriate, and to amend or supplement these objections and responses as appropriate.
- H. The foregoing general objections shall apply to each of the following Requests whether or not restated in the response to any particular response.

Case No. 2016-00370
Sierra Club Response to KU Request No. 1
Respondent: Jonathan Wallach, VP, Resource Insight, Inc.

Request No. 1: “Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Wallach in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Wallach, please provide an electronic version of those documents with all formulas intact.”

Response to Request No. 1: The one electronic spreadsheet file prepared by Mr. Wallach in connection with this proceeding, Exhibit JFW-2 to Mr. Wallach’s direct testimony, is attached. Mr. Wallach did not prepare any other notes, data, or workpapers in connection with this proceeding.

Case No. 2016-00370
Sierra Club Response to KU Request No. 2
Respondent: Jonathan Wallach, VP, Resource Insight, Inc.

Request No. 2: “Provide the workpapers, source data, and Excel spreadsheets with formulas intact for JFW-1* of Mr. Wallach’s testimony.” (*Counsel for KU clarified to counsel for Sierra Club that this data request intended to refer to Exhibit JFW-2.)

Response to Request No. 2: See Response to Request No. 1.

Dated: March 31, 2017

Respectfully submitted,



Of counsel
(not licensed in Kentucky):

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*Counsel for Sierra Club, Alice Howell, and
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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of SIERRA CLUB, ALICE HOWELL, AND CARL VOGEL'S RESPONSES AND OBJECTIONS TO KENTUCKY UTILITIES COMPANY'S DATA REQUESTS is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on March 31, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being hand delivered to the Commission.



JOE F. CHILDERS