

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Attorney General's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 4**

**Responding Witness: Counsel**

- Q-4. For each KU witness that filed testimony, identify all documents relied upon by the witness.
- A-4. The Company objects to this question because it is vague, overly broad and unduly burdensome. Without waiving that objection, the Company states that the record in this matter is already replete with documents relied upon by the Company and its witnesses for the issues presented. The Application was supported by voluminous information set forth in the minimum filing requirements and each witness' testimony was supported by those same filing requirements, references to information within the testimony, and exhibits to the testimony. The record will be further supplemented with information relied upon by the Company in the course of responding to specific discovery requests issued by the Attorney General and all other parties.

**KENTUCKY UTILITIES COMPANY**

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**Question No. 5**

**Responding Witness: Counsel**

- Q-5. To the extent not already provided in response to discovery or other filings made in the current KU rate case, or in the witness' workpapers being provided in response to data requests, provide a copy of the documents relied upon by each KU witness.
- A-5. The Company objects to this question because it is vague, overly broad and unduly burdensome. Without waiving that objection, the Company states that the record in this matter is already replete with documents relied upon by the Company and its witnesses for the issues presented. The Application was supported by voluminous information set forth in the minimum filing requirements and each witness' testimony was supported by those same filing requirements, references to information within the testimony, and exhibits to the testimony. The record will be further supplemented with information relied upon by the Company in the course of responding to specific discovery requests issued by the Attorney General and all other parties.

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**Response to Attorney General's Initial Data Requests for Information  
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**Question No. 6**

**Responding Witness: Counsel**

- Q-6. For each KU witness filing testimony, provide the testimony electronically in native format (e.g., Word) and provide all exhibits and supporting calculations electronically in native format (e.g., Excel).
- A-6. Objection regarding all file types requested except Excel. An electronic version of KU's filing and workpapers in this case are already available to all parties via the Commission's website. The AG can use the electronic files (portable document format (PDF) and Excel) already provided on the Commission's website, and can use readily available software to convert the PDF files to any file format the AG prefers. The Commission discovery process should not permit the AG to impose a burden upon KU that the AG can bear itself.

In addition, under 807 KAR 5:001 Section 8, KU requested, and the Commission approved, the use of electronic filing procedures in this proceeding. The AG consented to the use of those procedures. Among the requirements of 807 KAR 5:001 Section 8 are that the only file types in which a party may make an electronic submission are portable document format (PDF), Excel (for spreadsheets), MP3 (for audio files), and MPEG-4 (for video files). To comply with the AG's request would therefore require KU to request a deviation from the filing procedures, as well as to require KU to make additional expenditures to create six copies of the requested information on data storage media to file with the Commission. KU respectfully submits the AG should not be permitted to require KU to seek a deviation from procedures to which the AG has already consented, and should not be permitted to require KU to make additional and unnecessary expenditures where the AG has stated no reason for needing the files in native format.

Without waiver of this objection, please contact counsel if the AG has a particular problem with a specific file.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Attorney General's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 19**

**Responding Witness: Counsel**

Q-19. Data requests of others: With regard to all data requests served on the Company concerning the testimony of KU witnesses and other issues being addressed in this proceeding and to the extent that any of the responses to these data requests involve calculations using a program such as Microsoft Excel or Access, provide a complete copy of the electronic files, with formulas, calculations, macros, and cell references intact.

A-19. Objection. To the extent any data request issued by any party has sought the production of a file or program compatible with the Commission's electronic filing procedures (such as Excel), KU has provided that file in response to that specific request, and those files are already available to all parties via the Commission's website. The AG can use the electronic files (portable document format (PDF) and Excel) already provided on the Commission's website, and can use readily available software to convert the PDF files to any file format the AG prefers. The Commission's discovery process should not permit the AG to impose a burden upon KU that the AG can bear itself, particularly when it has given no reason for needing non-Excel native files.

In addition, under 807 KAR 5:001 Section 8, KU requested, and the Commission approved, the use of electronic filing procedures in this proceeding. The AG consented to the use of those procedures. Among the requirements of 807 KAR 5:001 Section 8 are that the only file types in which a party may make an electronic submission are portable document format (PDF), Excel (for spreadsheets), MP3 (for audio files), and MPEG-4 (for video files). To comply with the AG's request would therefore require KU to request a deviation from the filing procedures, as well as to require KU to make additional expenditures to create six copies of the requested information on data storage media to file with the Commission. KU respectfully submits the AG should not be permitted to require KU to seek a deviation from procedures to which the AG has already consented, and should not be permitted to require KU to make additional and unnecessary expenditures where the AG has stated no reason for needing the files in native format.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Attorney General's Initial Data Requests for Information  
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**Question No. 24**

**Responding Witness: Counsel**

- Q-24. Provide a list of all internal audit reports for 2015 and 2016 to date, for departments and/or operations which charge costs to KU.
- A-24. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the work product of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. To the extent responsive documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce a list of responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response and can be reviewed upon request.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Attorney General's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 112**

**Responding Witness: Counsel**

- Q-112. Provide a copy of the KU and parent company Board of Directors minutes for 2015 and 2016.
- A-112. Objection. This question seeks the production of information that is irrelevant to the issues in this case and relates to expectations of forecasted rate case outcomes. This information is not relevant to the analysis of the test period in this case. Moreover, portions of the requested information are confidential. Without waiver of this objection, the Company will produce relevant information responsive to this request.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Attorney General's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 216**

**Responding Witness: Counsel**

- Q-216. Identify all expenses incurred during the test year for athletic events, tickets, sky boxes and all sporting activities.
- a. Specifically identify the activity and dollar amount.
  - b. Provide copies of paid vouchers and invoices supporting these expenditures.
- A-216. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting new base rates for KU beginning July 1, 2017. The cited expenses were not principally charged to KU. To the extent any expenses were chargeable to or incurred by KU, they were below the line and were not included in the test year.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Attorney General's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 263**

**Responding Witness: Counsel**

- Q-263. Provide copies of all presentations made to rating agencies and/or investment firms by PPL, and/or Kentucky Utilities between January 1, 2015 and the present.
- A-263. Objection. This request seeks the production of documents that are irrelevant to the issues in this case and relate to non-utility or non-jurisdictional entities. Without waiver of this objection, the Company will produce the rating agencies presentations with the irrelevant information redacted. The presentations will be provided under seal pursuant to a petition for confidential treatment.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Attorney General's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 293**

**Responding Witness: Counsel**

- Q-293. For each residential account, provide an electronic database of each account's billed KWH for each month during the most recent 12-month period as well as the number of days within each billing cycle (as readily available). In this response, exact account numbers are not required, however, provide a unique numerical identification for each account. Provide in ASCII, comma-delimited format with all fields defined or in Microsoft Access format.
- A-293. The Company objects on the basis that the request is unduly burdensome and seeks irrelevant information. This question seeks specific and monthly usage account information for every residential customer in the system. Providing that level of detail for hundreds of thousands of customers is unduly burdensome and that level of detail has no relevance to the issues presented in this case. To the extent the Attorney General is interested in system wide usage information, see the information provided at Tab 26 of the filing requirements in this case.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Kroger Company Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 1**

**Responding Witness: Counsel**

- Q-1. Please provide an electronic version of KU's filing and workpapers in this case. This should include the documents listed in parts (a) through (e) below. In supplying these materials please remove any passwords or other restrictions that may otherwise be required to open or modify the files:
- (a) KU's Application, Testimony, Exhibits and Schedules in their native electronic formats, *i.e.*, Word, Excel, etc., with working formulas and references included where applicable.
  - (b) All workpapers utilized in the preparation of KU's filing in this case, preferably in Excel format with all working formulas and links included to the extent practicable.
  - (c) A working copy of KU's Base Year and Forecast Test Year Revenue Requirement model(s) and supporting workpapers in Excel format with working formulas included. If there is any supporting documentation on the use/operation of these models, please include the documentation with this response.
  - (d) A working copy of KU's Class Cost of Service model and all supporting workpapers in Excel format with working formulas included.
  - (e) A working copy of KU's Rate Design model and all supporting workpapers in Excel format with working formulas included.
- A-1. Objection regarding all file types requested except Excel. An electronic version of KU's filing and workpapers in this case are already available to all parties via the Commission's website. Kroger can use the electronic files (portable document format (PDF) and Excel) already provided on the Commission's website, and can use readily available software to convert the PDF files to any file format Kroger prefers. The Commission's discovery process should not permit Kroger to impose a burden upon KU that Kroger can bear itself s.

In addition, under 807 KAR 5:001 Section 8, KU requested, and the Commission approved, the use of electronic filing procedures in this proceeding. Kroger

consented to the use of those procedures. Among the requirements of 807 KAR 5:001 Section 8 are that the only file types in which a party may make an electronic submission are portable document format (PDF), Excel (for spreadsheets), MP3 (for audio files), and MPEG-4 (for video files). To comply with Kroger's request would therefore require KU to request a deviation from the filing procedures, as well as to require KU to make additional expenditures to create six copies of the requested information on data storage media to file with the Commission. KU respectfully submits Kroger should not be permitted to require KU to seek a deviation from procedures to which Kroger has already consented, and should not be permitted to require KU to make additional and unnecessary expenditures where Kroger has stated no reason for needing the files in native format.

Without waiver of this objection, please contact counsel if Kroger has a particular problem with a specific file.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated January 11, 2017**

**Question No. 15**

**Responding Witness: Counsel**

Q.1-15. Refer to page 23, lines 8-14 of Mr. Malloy's Direct Testimony wherein he states:

The other large driver of savings results from customers using less energy and using it more efficiently as they learn more about their own usage from the web portal that will be available to them as part of the AMS deployment. The Companies and other utilities have observed that customers who actively access such information tend to decrease their usage slightly. Aggregating those savings through 2039 produces net savings of over \$166 million (nominal) and over \$66 million NPV, which are savings customers will receive directly by reducing their bills through reduced usage.

- a. Please confirm that a reduction in customer revenues is not a reduction in the Companies' costs and that the \$166 million is not a savings to the Companies. If the Company cannot confirm this, then please explain why not.
- b. Please confirm that the reduction in customer revenues does not result in a reduction in the Companies' revenue requirements; it simply means that the Companies' costs must be recovered over fewer billing units, all else equal. If the Company cannot confirm this, then please explain why not.
- c. Please provide a copy of all internal correspondence that addresses whether a reduction in revenues is a valid benefit that should be included in the Companies' cost/benefit analyses.
- d. Please identify each person, their position, and their role in the decision to include a reduction in revenues as a savings in the Companies' cost/benefit analyses.
- e. Please confirm that the Companies recover the revenues lost due to energy efficiency and demand response initiatives through increased charges per billing unit, all else equal. If the Company cannot confirm this, then please explain why not.

A.1-15.

- c. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and may seasonably supplement this response through a rolling production of documents.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to First Set of Data Requests of  
Kentucky Industrial Utility Customers, Inc.  
Dated January 11, 2017**

**Question No. 49**

**Responding Witness: Counsel**

Q.1-49. Referring to the proposed Curtailable Service Rider:

- a. Please provide in native format all workpapers, studies, analyses, and documents (all Excel worksheets with working formulas and intact links) supporting and/or underlying the development of the proposed rider.
- b. Provide all studies and/or analyses that Kentucky Utilities Company (KU) conducted concerning expected customer acceptance of and willingness to receive service under the proposed rider.
- c. Identify and provide all documents provided to and correspondence with existing interruptible customers related to the development, implementation, and operation of the proposed CSR rider.
- d. Provide all documents relating to any customer comments and/or feedback that KU received regarding the proposed reductions in rate credits under the CSR rider prior to KU's deciding to include the reduced credits in the proposed CSR rider.
- e. Identify and provide all alternative rate credits for the CSR rider that KU considered but rejected, and describe in detail the reasons for rejecting the considered alternative(s).

A.1-49.

- e. Objection. All decisions regarding the development of the CSR Rider proposed in this case were made in consultation with legal counsel. Any response to this question necessarily requires the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. The Commission determined in its July 30, 2010 Order in Case No. 2009-00548 that such information is not discoverable. See pages 6-10 and Ordering Paragraph 5 of the Commission's July 30, 2010 Order in that case.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Kentucky League of Cities Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 57**

**Responding Witness: Counsel**

- Q-57. Provide a scheduling showing the dates, expense, and details associated with tickets or subscriptions (including those to Rupp Arena, PGA, and other venues) purchased in the years 2014, 2015, 2016 by:
- a. LKE
  - b. KU
  - c. LKS
  - d. LG&E and KU Capitol LLC
  - e. PPL Corp
  - f. PPL Electric Utilities Corp
  - g. PPL Services Corp
  - h. PPL Capitol Funding, Inc.
  - i. PPL Energy Funding Corp.
  - j. PPL Energy Supply, LLC
  - k. PPL Montour, LLC
- A-57. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting new base rates for KU beginning July 1, 2017. All such cited expenses, to the extent any were chargeable to or incurred by KU, were below the line and were not included in test years used for setting rates for the years cited. In addition, the forecasted test year in this proceeding includes no such expenses, which are below the line to the extent any are chargeable to or incurred by KU. The request also seeks the production of documents that are irrelevant to the issues in this case because the requested information relates to non-utility or non-jurisdictional entities.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Kentucky League of Cities Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 58**

**Responding Witness: Counsel**

- Q-58. For each municipality served by KU, provide the date, details, and total expense of shareholder-funded community events held within the municipality for the years 2014, 2015, 2016 for the following companies:
- a. LKE
  - b. KU
  - c. LKS
  - d. LG&E and KU Capitol LLC
  - e. PPL Corp
  - f. PPL Electric Utilities Corp
  - g. PPL Services Corp
  - h. PPL Capitol Funding, Inc.
  - i. PPL Energy Funding Corp.
  - j. PPL Energy Supply, LLC
  - k. PPL Montour, LLC
- A-58. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting new base rates for KU beginning July 1, 2017. All such cited expenses, to the extent any were chargeable to or incurred by KU, were below the line and were not included in test years used for setting rates for the years cited. In addition, the forecasted test year in this proceeding includes no such expenses, which are below the line to the extent any are chargeable to or incurred by KU. The request also seeks the production of documents that are irrelevant to the issues in this case because the requested information relates to non-utility or non-jurisdictional entities.



**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to First Request for Information of  
Kentucky School Boards Association (KSBA)  
Dated January 11, 2017**

**Question No. 25**

**Responding Witness: Counsel**

- Q-25. Please provide the Company's current estimate of expected amount and percentage revenues increases to be passed through the ECR, DSM and FAC mechanisms for the next five years.
- A-25. Objection. The request seeks the provision of information that is irrelevant to the issues in this case. The revenues associated with these rate mechanisms are removed from the forecasted test period presented in KU's application. KU's base rate application does not seek to adjust the operation of these rate mechanisms and the approval of KU's proposed change in base rates is separate and apart from the revenues collected by these rate mechanisms. Without waiver of this objection, the Company will further supplement this response on January 25, 2017.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Sierra Club's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 6**

**Responding Witness: Counsel**

Q-6. Reference William Steven Seelye, p. 10, ll. 4-5.

- a) Please provide copies of all e-mail communications, internal memoranda, reports, or other documentation of Mr. Seelye's or the Company's consideration of the amount to increase the Basic Service Charge and of the decision to increase the Basic Service Charge to \$22.00 per month.
- b) Please provide copies of all presentations to Company management or the Company's Board of Directors regarding consideration of the amount to increase the Basic Service Charge and of the decision to increase the Basic Service Charge to \$22.00 per month.

A-6.

- a. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and may seasonably supplement this response through a rolling production of documents.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Response to Sierra Club's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 20**

**Responding Witness: Counsel**

Q-20. Reference William Steven Seelye at p. 24, ll. 20-21.

- a) Please provide the basis for your assessment that the demand charge structure currently in use for the Company's large customers "seems to operate effectively," including an explanation of what constitutes "effective" operation in this context.
- b) Please provide copies of any internal memoranda, reports, or other documents in the Company's possession that indicate that the demand charge structure currently in use for the Company's large customers would "operate effectively" for residential customers.

A-20.

- b. Objection. The response to this question may require the Company to reveal the contents of communications with counsel and the mental impressions of counsel, which information is protected from disclosure by the attorney-client privilege and the work product doctrine. Counsel for the Company is presently undertaking a reasonable and diligent search for documents responsive to the request, but the search is not yet completed. To the extent the completed search for responsive documents shows documents, the content of which are protected from disclosure by the attorney-client privilege and the work product doctrine, objections are made to the production of such documents. Without waiver of these objections, the Company will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response. Counsel for the Company is continuing to undertake a reasonable and diligent search for other such documents and may seasonably supplement this response through a rolling production of documents.