

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

**In the Matter of:**

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

**DATA REQUESTS OF**  
**KENTUCKY UTILITIES COMPANY**  
**PROPOUNDED TO LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT**

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to Lexington-Fayette Urban County Government (“LFUCG”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 13, 2016.

**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, LFUCG, 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 LFUCG 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 LFUCG 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 LFUCG, 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

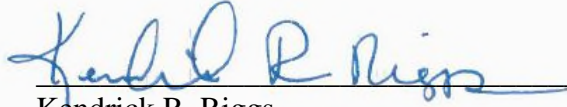
### Mr. Jester

1. Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Jester in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Jester, please provide an electronic version of those documents with all formulas intact.
2. Provide a copy of all direct and rebuttal testimony submitted by Mr. Jester in any state regulatory proceeding that deals with lighting rates.
3. Please indicate whether Mr. Jester performed an analysis of the purchased cost of LED lights from vendors that provide a 5-year warranty compared to LED lights from vendors that provide a 10-year warranty. If the answer is “yes,” provide Mr. Jester’s analysis.
4. On page 21, lines 4-7 of Mr. Jester’s testimony, he states as follows: “I note that using the weighted average cost of capital proposed by the Company in this case would result in a levelized fixed charge equal to approximately 74.9% of the fixed charges proposed by the Company for LED rates.” Please provide the supporting calculations for the 74.9% figure referenced by Mr. Jester.
5. On page 24, lines 1-5, of Mr. Jester’s testimony, he states as follows: “The Cities of Boston, Seattle, and Las Vegas are typically using long-life LED fixtures and photocell with anticipate 20-year life in current installations, reflecting their experience. It should be possible, and cost-effective, for Kentucky Utilities to use LED fixtures with an anticipated lifecycle consistent with an assumed 25-year depreciation schedule.” Please provide the following information regarding Mr. Jester’s statements:
  - a. Provide documents from Boston, Seattle, and Las Vegas where the city has stated that it anticipates a 20-year life for their current LED installations.
  - b. Please indicate whether the Cities of Boston, Seattle and Las Angeles performed a cost benefit analysis in support of their selection of LED lights that had a 20-year life. If so, provide a copy of the Cities’ or utility’s cost benefit analyses.
  - c. Please provide all analysis conducted by Mr. Jester demonstrating that it should be cost-effective for Kentucky Utilities to use LED fixtures with an anticipated lifecycle with an assumed 25-year depreciation schedule.
  - d. Please indicate whether the LED lights for the Cities of Boston, Seattle and Las Vegas were installed by (i) an investor-owned utility or by (ii) the Cities or the Cities’ municipal utilities.

6. Please indicate whether Mr. Jester is aware of any utility that experienced a complete life-cycle of an LED installation. If the answer is “yes,” please provide the name of the utility and the any documentation upon which Mr. Jester relies to support his answer.
7. Please indicate whether Mr. Jester has at any time performed any analysis of the lifespan of LEDs used in street lighting applications. If the answer is “yes,” provide Mr. Jester’s analysis.
8. Please indicate whether Mr. Jester has at any time performed any analysis of the costs to maintain LEDs used in street lighting applications. If the answer is “yes,” provide Mr. Jester’s analysis.
9. Refer to page 25, line 7 of Mr. Jester’s testimony. Please indicate whether Mr. Jester has conducted any analysis of features of LEDs used in street lighting applications, as compared to traditional street lighting options, including assessment of the capabilities or costs of remote detection or other sensors. If the answer is “yes,” provide Mr. Jester’s analysis.

Dated: March 17, 2017

Respectfully submitted,

A handwritten signature in blue ink, reading "Kendrick R. Riggs", is written over a horizontal line.

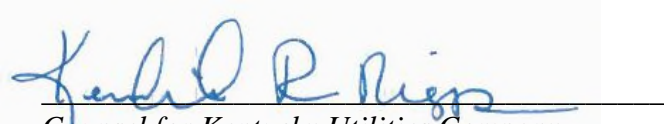
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*Counsel for Kentucky Utilities Company*

**CERTIFICATE OF COMPLIANCE**

This is to certify that Kentucky Utilities Company's March 17, 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 17, 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 U.S. First Class Mail, postage prepaid, to the Commission on March 17, 2017.



*Gerald R. Riess*  
Counsel for Kentucky Utilities Company