

KENTUCKY UTILITIES COMPANY

CASE NO. 2016-00370

**Response to Second Request for Information
of Kentucky Industrial Utility Customers, Inc.
Dated February 7, 2017**

Question No. 9

Responding Witness: Counsel

Q.2-9. Refer to the Attachment 2 to the response to KIUC 1-28.

- a) Provide a complete copy of this attachment with no redactions.
- b) Identify the person(s), employer(s), and position(s) who redacted sections of Attachment 2.
- c) For each redaction, describe the content of the redaction, provide all reasons why the content was redacted, and explain why the Company believes that the content should be redacted in this proceeding.

A.2-9. a) – c) Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting base rates for KU beginning July 1, 2017. The redacted data is non-responsive information regarding an entity that is not a party to the case, and does not charge any party to the case via intercompany transactions. Without waiver of this objection, KU will supplement subpart b) of this response on February 20, 2017.

KENTUCKY UTILITIES COMPANY

CASE NO. 2016-00370

**Response to Second Request for Information
of Lexington-Fayette Urban County Government
Dated February 7, 2017**

Question No. 3

Responding Witness: Counsel

- Q-3. Please refer to KU's response to LFUCG 1-22.
- a. Please identify what services EEI provides for the dues KU pays.
 - b. Please identify what services EEI provides for payments KU makes for lobbying activities.
 - c. Identify the specific issues on which EEI lobbies.
 - d. Identify to whom EEI lobbies on each specific issue.
- A-3. c. – d. Objection. The portion of dues KU related to lobbying activities 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. 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. When KU filed its Schedule F-1 as part of Tab 59 of its Application related to dues for the base period and forecasted period, it identified that a portion of the EEI dues were not sought to be recovered in rates.

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CASE NO. 2016-00370

**Response to Second Request for Information
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Dated February 7, 2017**

Question No. 30

Responding Witness: Counsel

Q-30. Please refer to KU's response to LFUCG 1-75.

- a. Please provide a detailed breakdown of the actual \$45,910.80 costs, separated by project.
- b. Provide copies of all invoices and other documentation to support the expenses identified in subparagraph (a) above.
- c. Please explain whether and how KU has accounted for the project cost of \$45,910.80 for the purposes of ratemaking.

A-30. a. – b. 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. 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. When KU filed its Schedule F-1 as part of Tab 59 of its Application related to dues for the base period and forecasted period, it identified that a portion of the EEI dues were not sought to be recovered in rates.