

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

-and-

ELECTRONIC APPLICATION OF LOUISVILLE GAS )  
AND ELECTRIC COMPANY FOR AN ADJUSTMENT )  
OF ITS ELECTRIC AND GAS RATES AND FOR ) CASE NO. 2016-00371  
CERTIFICATES OF PUBLIC CONVENIENCE AND )  
NECESSITY )

THE ATTORNEY GENERAL'S SUPPLEMENTAL RESPONSES  
TO CERTAIN DISCOVERY REQUESTS OF LOUISVILLE GAS &  
ELECTRIC CO. AND KENTUCKY UTILITIES CO.

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby provides the following supplemental responses to Certain Discovery requests of Louisville Gas & Electric Co. and Kentucky Utilities Co. propounded in the above-style matters.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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***Certificate of Service and Filing***

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on April 5, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 5<sup>th</sup> day of April, 2017.



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Assistant Attorney General

Application of Kentucky Utilities Co. for an Adjustment  
of its Electric Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00370  
Attorney General's Responses to Kentucky Utilities Company

**WITNESS/RESPONDENT RESPONSIBLE**  
**Larry W. Holloway, P.E./Counsel as to Objections**

**REQUEST No.2**  
**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Holloway in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Holloway, please provide an electronic version of those documents with all formulas intact.

ORIGINAL RESPONSE March 31, 2017: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiving this objection, Mr. Holloway provides the following documents in electronic format, being uploaded separately:

DA.xlsx  
Transmission.xlsx

AMENDED RESPONSE: All of the requested documents have been provided, and none are being withheld on the basis of any privilege.

Application of Kentucky Utilities Co. for an Adjustment  
of its Electric Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00370  
Attorney General's Responses to Kentucky Utilities Company

**WITNESS/RESPONDENT RESPONSIBLE**  
**Ralph C. Smith/ Counsel as to Objections**

**REQUEST No.6**  
**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Smith in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Smith, please provide an electronic version of those documents with all formulas intact.

ORIGINAL RESPONSE March 31, 2017: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, Mr. Smith states that his Exhibit workpapers in Excel were provided to the Company when his Direct Testimony was filed. See KU-AG Q6 Attachment 1 for Excel files for the tables in his testimony at pages 36 and 37 and KU-AG Q6 Attachment 2 for the tables in his testimony at page 44 for additional workpapers used to generate tables in the testimony.

AMENDED RESPONSE: All of the requested documents have been provided, and none are being withheld on the basis of any privilege.

Application of Kentucky Utilities Co. for an Adjustment  
of its Electric Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00370  
Attorney General's Responses to Kentucky Utilities Company

**WITNESS/RESPONDENT RESPONSIBLE**  
**Glenn A. Watkins/Counsel as to Objections**

**REQUEST No. 7**  
**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Watkins in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Watkins, please provide an electronic version of those documents with all formulas intact.

ORIGINAL RESPONSE March 31, 2017: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, Mr. Watkins is providing the following documents:

TAI BIP KU Classification.xls  
Schedule GAW-2.xls  
CCOSS Summary GAW-13.xls  
Customer Cost Analysis GAW-14.xls

In addition, the Excel workpapers and electronic spreadsheet relevant to class cost of service have previously been provided by the OAG.

See files:

KU\_Zip\_Code\_Analysis.xlsx  
KU\_Seeyle\_BIP\_Corrected\_for\_Errors\_with\_100\_percent\_Demand.xls  
KU\_Seeyle\_BIP\_Corrected\_for\_Errors.xls TAI\_BIP\_Primary\_100\_percent\_Demand.xls  
TAI\_BIP\_with\_Customer-Demand\_Split.xls TAI\_Prob\_Dispatch\_with\_100\_percent\_Demand.xls  
TAI\_Prob\_Dispatch\_with\_Time\_Fuel\_and\_Customer-Demand\_Split.xls  
Completed\_2\_Probability\_of\_Dispatch\_KU\_-\_Using\_Depreciation\_Reserve.xls  
Completed\_4\_Probability\_of\_Dispatch\_KU\_-\_Using\_Gross\_Plt.xls  
Hourly\_Fuel\_Costs\_KU\_and\_LGE\_-\_With\_Source\_and\_Meter\_-adjusted.xls

AMENDED RESPONSE: All of the requested documents have been provided, and none are being withheld on the basis of any privilege.

Application of Louisville Gas & Electric Co. for an Adjustment  
of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00371  
Attorney General's Responses to Data Requests of Louisville Gas & Electric Co.

**WITNESS/RESPONDENT RESPONSIBLE:**  
**LARRY HOLLOWAY/ Counsel as to Objections**

**QUESTION No. 2**  
**Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Holloway in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Holloway, please provide an electronic version of those documents with all formulas intact.

ORIGINAL RESPONSE dated March 31, 2017: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiving this objection, Mr. Holloway provides the following documents in electronic format, being uploaded separately:

DA.xlsx  
Transmission.xlsx

AMENDED RESPONSE: All of the requested documents have been provided, and none are being withheld on the basis of any privilege.

Application of Louisville Gas & Electric Co. for an Adjustment  
of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00371  
Attorney General's Responses to Data Requests of Louisville Gas & Electric Co.

**WITNESS/RESPONDENT RESPONSIBLE:  
RALPH SMITH/ Counsel as to Objections**

**QUESTION No. 6  
Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Smith in connection with this proceeding, including workpapers used to generate any and all tables and exhibits. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Smith, please provide an electronic version of those documents with all formulas intact.

ORIGINAL RESPONSE dated March 31, 2017: Objection. Some of Mr. Smith's notes are privileged under the attorney-client and/or the work product privilege(s), and thus will not be disclosed. Without waiving this objection, Mr. Smith states that his Exhibit workpapers in Excel were provided to the Company when his Direct Testimony was filed. See "LGE-AG Q6 Attachment 1" for Excel files for the tables in his testimony at pages 41 and 42 and "LGE-AG Q6 Attachment 2" for the tables in his testimony at pages 49 and 50 for additional workpapers used to generate tables in the testimony.

AMENDED RESPONSE: All of the requested documents have been provided, and none are being withheld on the basis of any privilege.

Application of Louisville Gas & Electric Co. for an Adjustment  
of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity  
Case No. 2016-00371  
Attorney General's Responses to Data Requests of Louisville Gas & Electric Co.

**WITNESS/RESPONDENT RESPONSIBLE:  
GLENN WATKINS/ Counsel as to Objections**

**QUESTION No. 7  
Page 1 of 1**

Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Watkins in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Watkins, please provide an electronic version of those documents with all formulas intact.

ORIGINAL RESPONSE dated March 31, 2017: Objection. The question seeks information covered by the Attorney-Client and/or Work Product privileges. Without waiver of this objection, Mr. Watkins is providing the following documents:

TAI BIP LG&E Classification.xls  
Schedule GAW-2.xls  
CCOSS Summary-LGE Electric.xls

In addition, the Excel workpapers and electronic spreadsheet relevant to class cost of service have previously been provided by the OAG. See files:

LGE\_Electric\_Zip\_Code\_Analysis.xlsx  
Seeyle\_Modified\_BIP\_as\_corrected.xls  
Seeyle\_Modified\_BIP\_as\_corrected\_100\_percent\_Demand.xls  
TAI\_BIP\_Primary\_100\_percent\_Demand.xls  
TAI\_BIP\_with\_Customer-Demand\_Split.xls  
TAI\_Prob\_Dispatch\_with\_100\_percent\_Demand.xls  
TAI\_Prob\_Dispatch\_with\_Time\_Fuel\_and\_Customer-Demand\_Split.xls  
TAI\_PandA\_100\_percent\_Demand.xls  
Completed\_3\_Probability\_of\_Dispatch\_LGE\_-\_Using\_Gross\_PLT.xls  
Completed\_1\_Probability\_of\_Dispatch\_LGE\_-\_Using\_Depreciated\_Reserve.xls  
Hourly\_Fuel\_Costs\_KU\_and\_LGE\_-\_With\_Source\_and\_Meter\_-adjusted.xls  
TAI\_Correction\_GAS\_CCOSS\_-\_Att\_LGE\_PSC\_1-53\_LGEGasCoss.xls  
Customer\_Cost\_Analysis-LGE\_Gas.xls  
Customer\_Cost\_Analysis\_-\_LGE\_Electric.xls

AMENDED RESPONSE: All of the requested documents have been provided, and none are being withheld on the basis of any privilege.