COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In th	ie M	[atter	of:
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ELECTONIC APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR AN ADJUSTMENT ELECTRIC)	CASE NO. 2016-00370
OF ITS RATES AND FOR CERTIFICATES OF)	
PUBLIC CONVIENCE AND NECESSITY)	

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT'S RESPONSES TO THE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Lexington-Fayette Urban County Government, by counsel, hereby submits the following responses to the Commission Staff's Initial Request for Information.

Respectfully submitted

STURGILL, TURNER, BARKER & MOLONEY, PLLC

James W. Gardner M. Todd Osterloh

333 W. Vine Street, Suite 1500

Lexington, Kentucky 40507

Telephone No.: (859) 255-8581 Facsimile No.: (859) 231-0851 jgardner@sturgillturner.com tosterloh@sturgillturner.com

and

Janet Graham, Commissioner of Law David J. Barberie, Managing Attorney Andrea C. Brown, Attorney Department of Law 200 East Main Street Lexington, Kentucky 40507 (859) 258-3500 jgraham@lexingtonky.gov dbarberi@lexingtonky.gov abrown2@lexingtonky.gov Attorneys for LFUCG

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the March 31, 2017, electronic filing of this Response is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be 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 an original paper medium of the Response will be delivered to the Commission within two business days.

Counsel for LFUCG

1. Refer to the Testimony of Douglas B. Jester ("Jester Testimony"), page 21, lines 4-7. Provide the calculation of the 74.9 percent.

RESPONSE - Please see the attached Excel spreadsheet named "KPSC 2016-00370 Jester Levelization Ratio Workpaper".

WITNESS – Douglas Jester

						Ir	ncome	Pr	operty			Di	scounted
Year	Value	Ea	arnings	Depr	eciation		Tax		Tax	RR	Discount		RR
1	\$ 1,000.00	\$	72.91	\$	40.00	\$	34.69	\$	18.24	\$ 165.84	1	\$	165.84
2	\$ 960.00	\$	69.99	\$	40.00	\$	33.30	\$	17.51	\$ 160.81	0.92709	\$	149.08
3	\$ 920.00	\$	67.08	\$	40.00	\$	31.91	\$	16.78	\$ 155.77	0.859496	\$	133.89
4	\$ 880.00	\$	64.16	\$	40.00	\$	30.53	\$	16.05	\$ 150.74	0.79683	\$	120.11
5	\$ 840.00	\$	61.24	\$	40.00	\$	29.14	\$	15.32	\$ 145.71	0.738733	\$	107.64
6	\$ 800.00	\$	58.33	\$	40.00	\$	27.75	\$	14.59	\$ 140.67	0.684872	\$	96.34
7	\$ 760.00	\$	55.41	\$	40.00	\$	26.36	\$	13.86	\$ 135.64	0.634938	\$	86.12
8	\$ 720.00	\$	52.50	\$	40.00	\$	24.98	\$	13.13	\$ 130.60	0.588645	\$	76.88
9	\$ 680.00	\$	49.58	\$	40.00	\$	23.59	\$	12.40	\$ 125.57	0.545727	\$	68.53
10	\$ 640.00	\$	46.66	\$	40.00	\$	22.20	\$	11.67	\$ 120.54	0.505938	\$	60.98
11	\$ 600.00	\$	43.75	\$	40.00	\$	20.81	\$	10.94	\$ 115.50	0.46905	\$	54.18
12	\$ 560.00	\$	40.83	\$	40.00	\$	19.43	\$	10.21	\$ 110.47	0.434851	\$	48.04
13	\$ 520.00	\$	37.91	\$	40.00	\$	18.04	\$	9.48	\$ 105.44	0.403146	\$	42.51
14	\$ 480.00	\$	35.00	\$	40.00	\$	16.65	\$	8.76	\$ 100.40	0.373753	\$	37.53
15	\$ 440.00	\$	32.08	\$	40.00	\$	15.26	\$	8.03	\$ 95.37	0.346503	\$	33.05
16	\$ 400.00	\$	29.16	\$	40.00	\$	13.88	\$	7.30	\$ 90.34	0.321239	\$	29.02
17	\$ 360.00	\$	26.25	\$	40.00	\$	12.49	\$	6.57	\$ 85.30	0.297818	\$	25.40
18	\$ 320.00	\$	23.33	\$	40.00	\$	11.10	\$	5.84	\$ 80.27	0.276104	\$	22.16
19	\$ 280.00	\$	20.41	\$	40.00	\$	9.71	\$	5.11	\$ 75.24	0.255973	\$	19.26
20	\$ 240.00	\$	17.50	\$	40.00	\$	8.33	\$	4.38	\$ 70.20	0.23731	\$	16.66
21	\$ 200.00	\$	14.58	\$	40.00	\$	6.94	\$	3.65	\$ 65.17	0.220008	\$	14.34
22	\$ 160.00	\$	11.67	\$	40.00	\$	5.55	\$	2.92	\$ 60.13	0.203967	\$	12.27
23	\$ 120.00	\$	8.75	\$	40.00	\$	4.16	\$	2.19	\$ 55.10	0.189096	\$	10.42
24	\$ 80.00	\$	5.83	\$	40.00	\$	2.78	\$	1.46	\$ 50.07	0.175309	\$	8.78
25	\$ 40.00	\$	2.92	\$	40.00	\$	1.39	\$	0.73	\$ 45.03	0.162527	\$	7.32

11.64892 \$ 1,446.33 \$ 124.16 74.9%

LFUCG Responses to PSC Staff Initial Request for Information

2. Refer to the Jester Testimony, page 25, lines 10-12. Explain what is meant by the term "future

proof."

RESPONSE - The term "future proof" is a term of art in the technology industry referring to the

practice of making a product that interfaces with the most advanced standards-based technology

even though that technology is not initially included in the product. The emerging standards-

based technology can then be added to, or integrated with, your product at a later time. In this

case, the manufacturers of advanced control systems for street lights have settled on a seven-pin

photocell receptor as the interface to the streetlight, making it possible to add advanced control

systems, communications technologies, sound detection systems, etc., at a later time without

replacing the light fixture.

WITNESS – Douglas Jester

AFFIDAVIT

The undersigned, Douglas B. Jester, being duly sworn, deposes and says that he is a principal of 5 Lakes Energy LLC, and that he has supervised the preparation of the foregoing responses to the Commission Staff's Initial Request for Information and Data Request of Kentucky Utilities to Lexington-Fayette Urban County Government, and that the responses are true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry

Douglas B. Jester, Affiant

NOTARY CERTIFICATE

STATE OF MICHIGAN

COUNTY OF Logham

Subscribed, acknowledged and sworn to before me by Douglas B. Jester on this 29

day of March, 2017.

My commission expires: 501. 23

LINDSI L. CHAPMAN
Notary Public, State of Michigan
County of Ingham
My Commission Expires Sep. 23, 2023
Acting in the County of

NOTARY PUBLIC