

**Commonwealth of Kentucky
Before the Public Service Commission**

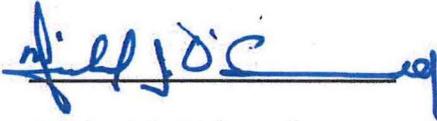
In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS ELECTRIC AND GAS)
RATES AND FOR CERTIFICATES OF PUBLIC)
CONVENIENCE AND NECESSITY)

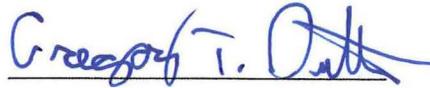
Case No.
2016-00371

**Initial Requests for Information to
Louisville Gas and Electric Co. from
Louisville/Jefferson County Metro Government**

Respectfully submitted,



Michael J. O'Connell
Jefferson County Attorney's Office
Brandeis Hall of Justice
600 West Jefferson Street, Suite 2086
Louisville, KY 40202
Telephone: 502-574-5772
Mike.OConnell@louisvilleky.gov



Gregory T. Dutton
Goldberg Simpson, LLC
9301 Dayflower Street
Prospect, Kentucky 40059
Telephone: 502-589-4440
gduyton@goldbergsimpson.com

INSTRUCTIONS

- (1) Please identify the witness (es) who will be prepared to answer questions concerning each request.
- (2) Please repeat the question to which each response is intended to refer. An electronic version of these data requests can be provided, upon request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon. Those supplemental responses shall be provided as soon as the Company becomes aware of or in possession of the new or additional information.
- (4) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (6) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available.
- (7) For any document withheld on the basis 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 called for has been destroyed or transferred beyond the control of the company, please 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 destroyed or disposed of by operation of a retention policy, state the retention policy.
- (9) Please provide all spreadsheets used in responses to these requests for information in excel format with all cells unlocked and functional.

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1. Referring to Application Attachment to Tab 4, LG&E Electric Tariffs, P.S.C. Electric No. 11, Original Sheet No. 15.1 (PDF Pg. No. 18):
 - a. Explain the circumstances that determine whether KU and LG&E choose to install a kilovolt-ampere (kVA) meter or to apply the formula for adjusting billing demand.
 - b. How many customers are billed under the formula?
2. Referring to Application Attachment to Tab 16 - Item A, page 5 (PDF Pg. No. 653), when does management approve the annual budget for the upcoming fiscal year?
3. Referring to Application Attachment to Tab 16 - Item G, page 7 (PDF Pg. No. 798):
 - a. Provide the planned maintenance schedule by generating unit, including the beginning/ending date, duration and reasons for the outage (*i.e.*, inspection, overhaul).
 - b. Provide a list of all maintenance outages by generating unit, including the beginning/ending date, duration and reasons for the outage (*i.e.*, inspection, overhaul) for the period 2013-2016.
 - c. Provide a schedule showing the Henry Hub natural gas prices for the years 2017 and 2018 used in the forecast.
4. Referring to Application Attachment to Tab 16 - Item H, page 19 (PDF Pg. No. 822), for each overhaul state the beginning/ending date and anticipated outage duration.
5. Referring to Application Attachment to Tab 16 - Item I, page 17 (PDF Pg. No. 870):
 - a. Provide the same information as presented in the schedule for the following periods:
 - i. Actual 2014;
 - ii. Actual 2016;
 - iii. Test Year.
 - b. Provide the same information as presented in this schedule for LG&E.
 - c. Provide the same information as presented in this schedule for LG&E for the following periods:
 - i. Actual 2014;
 - ii. Actual 2016;
 - iii. Test Year.

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6. Referring to Application Attachment to Tab 16 - Item I, page 49 (PDF Pg. No. 902):
 - a. Provide the information shown in this schedule for LG&E.
 - b. Provide actual information for 2016.
 - c. Provide the information for the Test Year.
 - d. Provide the assumptions underlying the \$1.1 million increase in Line Clearance expenses between the 2018 and 2019 Plans.
 - e. Provide the assumptions underlying the \$2.569 million increase in storm restoration costs between 2016 and 2017 and the \$673,000 increase between 2017 and 2018.
7. Referring to Application Attachment to Tab 16 - Item I, page 117 (PDF Pg. No. 970):
 - a. Provide the information for LG&E.
 - b. Provide the information for actual 2016.
 - c. Explain the projected escalation in Line Clearing expenses for the years 2016-2018.
 - d. Provide a history of transmission operation and maintenance (O&M) expenses associated with Line Clearing and Storm Restoration by KU and LG&E for the period 2012-2014.
8. Referring to Application Attachment to Tab 16 - Item I, page 128 (PDF Pg. No. 981):
 - a. Provide the information for LG&E.
 - b. Provide information for actual 2016.
 - c. Explain the projected escalation in Misc. Transmission Expense for the years 2016-2019.
9. Referring to Application Attachment to Tab 16 - Item I, page 129 (PDF Pg. No. 982):
 - a. Explain the scope of activities included under Overhead Lines.
 - b. Explain the increases in headcount for Overhead Lines projected in 2016-2018.
10. Referring to Application Attachment to Tab 16 - Item I, page 135 (PDF Pg. No. 988):
 - a. Provide the actual 2016 information.
 - b. Provide the information for LG&E for the periods shown and for the Test Year.
 - c. Explain the \$3 million jump in O&M expense in 2018.
11. Referring to the presentation entitled "Energy Supply and Analysis 2017 Business Plan" found in Application Attachment to Tab 16 - Item I, beginning on page 143 (PDF Pg. No. 996) , explain why pages 3, 4 and 11 (a.k.a. PDF Pg. Nos. 145, 146 and 153) are blank.
12. Referring to Application Attachment to Tab 16 - Item I, page 212 (PDF Pg. No. 1065):
 - a. Provide the information for LG&E.
 - b. Provide information for actual 2016.
 - c. Provide the information for LG&E for the Test Year.
 - d. Explain the projected escalations for the years 2017-2018.

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13. Referring to Application Attachment to Tab 16 - Item I, page 218 (PDF Pg. No. 1071), explain the increases in HW/SW Maintenance expenses projected in 2017 and 2018.
14. Referring to Application Attachment to Tab 16 - Item I, page 220 (PDF Pg. No. 1073), explain the reasons for the increase in the contingency amount from 2017 and 2018.
15. Referring to Application Attachment to Tab 16 - Item I, page 239 (PDF Pg. No. 1092):
 - a. Provide the actual 2016 information.
 - b. Provide the information for LG&E for the periods shown and for the Test Year.
 - c. Explain the projected increases in pension expense in 2017 and 2018.
16. Referring to Application Schedule B-5, page 1 (PDF Pg. No. 130):
 - a. Explain why fuel expense is not removed in determining cash working capital.
 - b. Provide citations to prior PSC decisions in the past 10 years authorizing a cash working capital allowance calculated in the manner being proposed in this case (*i.e.*, where fuel costs are not removed).
17. Referring to Application Schedule M-2.3, page 1 (PDF Pg. No. 462), reconcile the Revenue Adjusted in Schedule M-2.3 to the corresponding Total Revenue at Present Rates as shown in Schedule M-2.1.
18. Referring to Direct Testimony of Mr. Conroy, pages 6-7:
 - a. Provide a schedule showing the hourly loss of load probabilities (LOLPs) used in allocating fixed production costs in native (Live EXCEL workbooks or compatible) format.
 - b. Provide a schedule showing the hourly LOLPs for the years 2013-2016 in native (Live EXCEL workbooks or compatible) format.
19. Referring to Direct Testimony of Mr. Conroy, page 36:
 - a. Provide a schedule showing the projected \$470 million nominal dollar savings by year.
 - b. Provide workpapers demonstrating how these projected savings are being reflected in test year O&M expenses.
 - c. Quantify the projected savings associated with the proposed DA deployment by year and provide workpapers demonstrating how these projected savings are being reflected in test year O&M expenses.

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20. Referring to Direct Testimony of Mr. Seelye, page 9:
 - a. Explain how Mr. Seelye determined that capping the increase to 1 percentage point above the overall increase was reasonable.
 - b. Identify any regulatory decisions that adopted the proposal to cap the increase to 1 percentage point above the overall increase was reasonable.
 - c. Explain how Mr. Seelye determined that a 15% rate of return was a reasonable threshold for determining whether the rates charged to a particular class should not be increased.
 - d. Identify any regulatory decisions that adopted the proposal to assign no increase to a class that was producing a 15% or higher rate of return.

21. Referring to Direct Testimony of Mr. Seelye, page 9-10:
 - a. Explain how economic factors impact the rate of return that a class should provide?
 - b. Identify other economic factors that Mr. Seelye believes are relevant to determine a class's rate of return.
 - c. Define the time period over which LG&E plans to eliminate subsidies.
 - d. Define what Mr. Seelye believes would be an unduly large rate increase for any one major class.
 - e. Identify the major rate classes.
 - f. Does Mr. Seelye believe that different principles should be applied in applying gradualism to the non-major rate classes? If so, identify the gradualism principles that should be applied.

22. Referring to Direct Testimony of Mr. Seelye, page 27, with respect to the Rate PS (Power Service):
 - a. Provide the cost basis for the higher Demand charges applicable to Primary customers.
 - b. Provide the cost basis for narrowing the differential in the Energy charges for Secondary and Primary service.

23. Referring to Direct Testimony of Mr. Seelye, page 28, provide a copy of the treatise.

24. Referring to Direct Testimony of Mr. Seelye, page 56, provide documents supporting the statement that LED fixtures have shorter average service lives than conventional fixtures.

25. Referring to Direct Testimony of Mr. Seelye, page 72, are the rates shown in Table 10 based on the actual cost to serve customers; that is, will they produce a system average rate of return? If the response is no, restate the rates that would produce a system average rate of return.

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26. Referring to Direct Testimony of Mr. Seelye, page 73, explain how a 215% increase in gas rates applicable to a specific customer is not unduly large.
27. Referring to Direct Testimony of Mr. Seelye, pages 78-79, reconcile the statement that the GLT rate base would be moved from the GLT mechanism into general rate base with the statement on page 36 of Mr. Garrett's testimony stating that GLT rate base was removed from gas capitalization and rate base.
28. Referring to Direct Testimony of Mr. Seelye, page 90, explain the rationale for applying the Base-Intermediate-Peak (BIP) methodology to transmission fixed costs.
29. Referring to Direct Testimony of Mr. Seelye, pages 105-106, provide support for the statement that LG&E is required to use its storage gas to serving daily imbalances for all transportation customers.
30. Referring to Exhibit WSS-4, provide workpapers showing the derivation of the following:
 - a. Fixed Charges (\$/Yr);
 - b. Distribution Energy per kilowatt-hour (kWh)
 - c. (\$/Yr);
 - d. Distribution Energy Costs; and
 - e. O&M (\$/Yr).
31. Referring to Exhibit WSS-5, provide workpapers supporting the estimated investment per unit for each type of LED fixture.
32. Referring to Exhibit WSS-17, page 1, provide workpapers showing the derivation of Weighted LOLP factors by Rate Class in native (live EXCEL or compatible format).
33. Referring to Exhibit WSS-21, page 10, explain why energy costs were not similarly allocated between Base, Intermediate and Peak functions.
34. Referring to Exhibit WSS-22, page 43, provide workpapers showing the derivation of the F017 and PROFIX functional vectors.
35. Referring to Exhibit WSS-23, page 52, provide the workpapers showing the derivation of each Demand Allocator in native (live EXCEL or compatible) format.
36. Referring to Exhibit WSS-23, page 55, provide the workpapers showing the derivation of each Production Allocation factor in native (live EXCEL or compatible) format.

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37. Referring to Exhibit WSS-25, explain and provide workpapers supporting the determination of the amount of storage and non-storage feet for each size transmission main.
38. Referring to Exhibit WSS-29, explain how each DEM allocation factor was derived and provide supporting workpapers. The explanation should include but not be limited to:
 - a. The design day.
 - b. How the test year quantities were derived from historical quantities.
39. Referring to Exhibit WSS-30, identify the design day used in the DEM and storage allocation factors and provide supporting workpapers showing how the test year quantities were derived from historical quantities.
40. Provide the following pages from Direct Testimony of Mr. Spanos, Exhibit JJS-LG&E-1 in native Excel format with formulas intact:
 - a. VI-4 through VI-13
 - b. VIII-2 through VIII-3
41. Confirm from Direct Testimony of Mr. Spanos, Exhibit JJS-LG&E-1, Part IX, Detailed Depreciation Calculations:
 - a. Is the column titled “Calculated Accrued” the theoretical reserve?
 - b. Provide the formula used to calculate the “Calculated Accrued” amounts.
42. Provide the total amount of short-term incentive compensation included in the base period and forecasted period.
43. Provide the amount of short-term incentive compensation included in the base period and forecasted period that is related to financial based goals such as earnings, earnings per share (EPS), return on equity, etc. Provide work papers detailing how these amounts were determined.
44. Provide the total amount of long-term incentive compensation included in the base period and forecasted period.
45. Provide the amount of long-term incentive compensation included in the base period and forecasted period that is related to financial based goals such as earnings, EPS, return on equity, etc. Provide work papers detailing how these amounts were determined.

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46. Provide company instructions describing the short-term and long-term incentive compensation plans and which list goals and weightings used to determine the compensation amounts.
47. Provide the depreciation study that the current depreciation rates are based upon.
48. Provide the following parameters used to determine the current depreciation rates for each FERC Account and each Production Plant:
 - a. Retirement Year;
 - b. Interim Survivor Curve and Life;
 - c. Net Salvage Percent;
 - d. Remaining Life; and
 - e. Book Depreciation Reserve Ratio.
49. Provide explanations for all changes in the retirement years and survivor curves used to calculate the current rates and the proposed rates.
50. Provide an explanation for the differences in the accrual rates for Account No. 312 shown on Schedule B-3.2. Page 1 reflects an accrual rate of 3.16% and Page 3 reflects a rate of 3.85%. Please include explanations for all changes in the retirement years, survivor curves and net salvage used to calculate the current rates and the proposed rates
51. Provide the following parameters used to determine the current depreciation rates for each FERC account (Electric and Gas) for Transmission, Distribution and General plant:
 - c. Survivor Curve and Life
 - d. Net Salvage Percent
 - e. Remaining Life
 - f. Book Depreciation Reserve Ratio
 - g. Amortization Periods
52. Provide the annual O&M expenses associated with Steam Turbine/Generator overhauls for the following periods and provide a listing of overhauls that occurred or are planned to occur in each period:
 - a. 2012-2016;
 - b. Base Period;
 - c. Forecasted Test Year; and
 - d. Forecasted 2017 – 2020.

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53. Provide a schedule showing the following information for each current Louisville Metro account for calendar years 2015 and 2016:
 - a. Applicable tariff
 - b. Other tariffs that could be applicable to this account.
 - c. Total sum paid
 - d. Customer Class.
54. For each customer class listed in response to 53(d) above,
 - a. Provide the proposed percentage increase to that class.
 - b. Provide the percentage of the total revenue increase requested that will be allocated to that class.
55. Provide the quantity, size, type, and street address of each street light located within Jefferson County. Also indicate:
 - a. Which entity owns each street light.
 - b. The anticipated retirement/replacement date for each light fixture.
56. For each type of light located in Jefferson County, provide the cost of obtaining and annual maintenance.
57. Provide the average time to repair a malfunctioning street light from the time of discovery, either by public reporting or LG&E representative, to the time the light is restored to operation.
58. Provide a chart of maintenance and repair calls for each street light in Jefferson County and the total cost for each call, including both materials and labor.
59. Provide separately the number of calls from the public regarding street lights in Jefferson County and the rest of the LG&E system.
60. Provide any internal policies or procedures with regards to street light maintenance, repair and replacement.
61. Provide any data or research in LG&E's possession on the benefits both in terms of energy efficiency and cost savings related to the use of LED street lighting.
62. Provide the total miles and type of electrical line both above and underground located in Jefferson County.
63. Provide the total miles of natural gas mains and service lines located in Jefferson County.
64. Provide the most recent study conducted by LG&E or on behalf of LG&E tracking the flow of natural gas throughout the LG&E natural gas distribution system.

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65. Provide the number of utility poles located within Jefferson County.
 - a. Provide the number of poles located in the Rights of Way.
 - b. Provide the total revenue received by LG&E as a result of fees charged for third party attachments to the poles.
66. Regarding LG&E response to Commission DR 1-59, state for the years 2013-2015 and the base year the amount of the expense paid for by shareholders and the amount paid out of base rates.
67. Provide and explain any rate impacts LG&E customers will experience with the impending loss of 9 KU municipal customers.
68. Provide the dates, details and total expenses to LG&E of community events that it held or funded during the period from January 1, 2014 to December 31, 2016.
69. Provide the dates, details and total expenses to LKS of community events that it held or funded during the period from January 1, 2014 to December 31, 2016.
70. Provide the dates, details and total expenses to LKE of community events that it held or funded during the period from January 1, 2014 to December 31, 2016.
71. Provide the dates, details and total expenses to PPL of community events that it held or funded during the period from January 1, 2014 to December 31, 2016.
72. See LGE response to Commission DR 1-48(10) – what expense does LGE expect for use of Cities’ rights of way in forecast year.
73. Regarding LG&E response to Commission DR 1-59, state for the years 2013-2015 and the base year the amount of the expense paid for by shareholders and the amount paid out of base rates.
74. Regarding LG&E’s answer to the PSC’s 1st and 2nd data request, state how much money was, or will be, transmitted between LG&E and LKE during:
 - a. The period beginning January 1, 2012 and concluding December 31, 2016;
 - b. The Base Period, as defined for purposes of this case;
 - c. The Forecasted Test Year, as defined for purposes of this case; and
 - d. The forecasted period from January 1, 2017 to December 31, 2020.

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75. Regarding LG&E's answer to the PSC's 1st and 2nd data request, state how much money was, or will be, transmitted between KU and LKE during:
- The period beginning January 1, 2012 and concluding December 31, 2016;
 - The Base Period, as defined for purposes of this case;
 - The Forecasted Test Year, as defined for purposes of this case; and
 - The forecasted period from January 1, 2017 to December 31, 2020.
76. Regarding LG&E's answer to the PSC's 1st and 2nd data request, state how much money was, or will be, transmitted between LKS and LKE during:
- The period beginning January 1, 2012 and concluding December 31, 2016;
 - The Base Period, as defined for purposes of this case;
 - The Forecasted Test Year, as defined for purposes of this case; and
 - The forecasted period from January 1, 2017 to December 31, 2020.
77. Regarding LG&E's answer to the PSC's 1st and 2nd data request, please state how much money was, or will be, transmitted between unregulated entities and LKE during:
- The period beginning January 1, 2012 and concluding December 31, 2016;
 - The Base Period, as defined for purposes of this case;
 - The Forecasted Test Year, as defined for purposes of this case; and
 - The forecasted period from January 1, 2017 to December 31, 2020.
78. Regarding your answer to 77 above; if money was transferred, or will be transferred between unregulated entities and LKE, is this information listed in any public disclosures, such as Securities and Exchange Commission filing? If so, provide all relevant documentation.
79. What are the total assets of LKE? Please provide all relevant documentation
80. Are the total assets and liabilities of LKE listed in any other public disclosure, such as Securities and Exchange Commission filing?
81. What is the balance of LKS?
82. Is LKE regulated by any entity, be it another business organization, a government agency, or any legal rules and regulations?
83. What are LKE's sources of funding?
84. Are LKE's assets and liabilities documented elsewhere in any format?
85. What are the total assets of LG&E? Please provide all relevant documentation.

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86. Are the total assets and liabilities of LG&E listed in any other public disclosure, such as Securities and Exchange Commission filing?
87. What is the balance of LG&E?
88. Is LG&E regulated by any entity, be it another business organization, a government agency, or any legal rules and regulations?
89. What are LG&E's sources of funding?
90. Are LG&E's assets and liabilities documented elsewhere in any format? If so please provide all relevant documents.
91. What are the total assets of KU Capital LLC? Please provide all relevant documentation.
92. Are the total assets and liabilities of KU Capital LLC listed in any other public disclosure, such as Securities and Exchange Commission filing?
93. What is the balance of KU Capital LLC?
94. Is KU Capital LLC regulated by any entity, be it another business organization, a government agency, or any legal rules and regulations?
95. What are KU Capital LLC's sources of funding?
96. Are KU Capital LLC's assets and liabilities documented elsewhere in any format? If so, please provide all relevant documents.
97. Provide a schedule showing the dates, expense, and details associated with tickets or subscriptions (including those to KFC Yum Center, PGA, and Actors theater, Louisville Slugger Field, Broadway Series, and other venues and events) purchased in the years 2014, 2015, 2016 by:
 - a. LKE
 - b. LG&E
 - 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

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98. Reference LG&E response to PSC 1-6(b). Besides LGE and KU, who else pays dividends to LKE?
99. What percentage of PPL dividends are attributed to revenue from the following:
- a. LKE
 - b. KU
 - c. LG&E
 - d. LKS
 - e. LG&E and KU Capitol LLC
 - f. PPL Corp
 - g. PPL Electric Utilities Corp
 - h. PPL Services Corp
 - i. PPL Capital Funding, Inc.
 - j. PPL Energy Funding Corp.
 - k. PPL Energy Supply, LLC
 - l. PPL Montour, LLC
100. Provide the name and percentage of any other entities contributing a percentage of PPL's dividends.
101. Provide copies of all presentations made to rating agencies and/or investment firms by PPL, and/or Louisville Gas & Electric between January 1, 2015 and the present.
102. Provide copies of all prospectuses for any security issuances by PPL and/or Louisville Gas & Electric between January 1, 2013 and the present.
103. Provide copies of credit reports for PPL and/or Louisville Gas & Electric between January 1, 2015 and the present from the major credit rating agencies (Moody's, S&P, and Fitch).
104. Provide the corporate credit and bond ratings assigned to PPL and Louisville Gas & Electric since the year 2010 by S&P, Moody's, and Fitch. For any change in the credit and/or bond rating, provide a copy of the associated report.
105. Provide the breakdown in the expected return on pension plan assets for Louisville Gas & Electric. Specifically, provide the expected return on different assets classes (bonds, US stocks, international stocks, etc) used in determining the expected return on plan assets. Provide all associated source documents and work papers.

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106. For the past five years, provide the dates and amount of: (1) cash dividend payments made to PPL by Louisville Gas & Electric; and (2) cash equity infusions made by PPL into Louisville Gas & Electric.
107. Provide the Company's authorized and earned return on common equity for Louisville Gas & Electric over the past five years. Provide copies of all associated work papers and source documents. Provide copies of the source documents, work papers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
108. Provide copies of the financial statements (balance sheet, income statement, statement of cash flows, and the notes to the financial statements) for PPL and Louisville Gas & Electric for 2014, 2015, and 2016 (when available). Provide copies of the financial statements in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
109. Provide the working electronic copies of all pages of Schedule J – Cost of capital. Provide the copies of the data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
110. With regard to Schedule J: (1) provide copies of all data, source documents, calculations and work papers associated with development of the short-term and long-term debt costs; (2) detail all assumptions and show calculations for projected amounts and costs of short and long-term debt; (3) provide copies of prospectuses and inter-company loan agreements for all debt issuances; and (4) provide the data and work papers in (1) and (2) in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
111. Provide copies of all data, source documents, calculations and work papers associated with development of the proposed capital structure set forth in Schedule J. Provide copies of the source documents, work papers, and data in both hard copy and working electronic (Microsoft Excel) formats, with all data and formulas intact.
112. Provide a copy of Mr. Arbough's testimony in Microsoft Word.
113. Provide copies of all source documents, articles, cited documents listed in footnotes, regulatory decisions, work papers, and other sources used in the development and preparation of pages 8-13 in the testimony of Mr. Arbough.

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114. With reference to the Arbough testimony, page 8, lines 9-13, provide the quarterly capitalization amounts and ratios for Louisville Gas and Electric and PPL Corporation for the years 2014 – 2016. Provide the data and work papers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
115. With reference to the Arbough testimony page 9, lines 8-16, provide the data, source documents and calculations detailing the Moody's debt percentage ratios. Provide the data and work papers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
116. With reference to the Arbough testimony page 10, lines 15-21, provide the data, source documents and calculations detailing the S&P debt percentage ratios. Provide the data and work papers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
117. Provide a copy of Mr. McKenzie's testimony in Microsoft Word.
118. Provide copies of Mr. McKenzie's Exhibit Nos. 2 through 11 in Microsoft Excel, with data and formulas intact.
119. Provide copies of all source documents, articles, cited documents listed in footnotes, regulatory decisions, work papers, and other sources used in the development and preparation of the testimony of Mr. McKenzie.
120. Provide copies of the source documents, work papers, and underlying data used in the development of all exhibits for Mr. McKenzie (Exhibit No. 2 through Exhibit No. 11). Provide the data and work papers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
121. With reference to pages 20-23 of Mr. McKenzie's testimony: (1) indicate the universe of electric and utility companies as indicated by Value Line Investment Survey, (2) the companies eliminated from each group from each of the screens; and (3) the reasons each of the companies were eliminated.

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122. With reference to pages 20-23 of Mr. McKenzie's testimony, provide copies of all studies performed that compare the business, financial and overall investment risk of Louisville Gas & Electric to: (1) PPL Corporation and (2) the proxy group of electric and gas companies.
123. With reference to pages 45-46 of Mr. McKenzie's testimony, provide the theoretical and empirical studies that support the use of the size premium.
124. With reference to page 47 of Mr. McKenzie's testimony, provide the theoretical and empirical studies that support the use of the ECAPM with the .25/.75 weights versus the traditional CAPM.
125. With reference to pages 49-52 of Mr. McKenzie's testimony and Exhibit No. 9, provide the following: (1) the individual authorized ROEs that are used in computing the annual Allowed ROEs in Column (a); (2) for each of the individual ROEs, include all of the following: the order or docket number, the state, the utility, the decision date, the authorized ROE, the authorized common equity ratio, whether the rate case was fully litigated or settled, and whether the authorized included any specific ROE adders and/or penalties; and (3) the data and work papers for (1) and (2) in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Also include electronic copies (Microsoft Excel) of the Schedule, leaving all data and formulas intact.
126. With reference to page 59 of Mr. McKenzie's testimony, provide: (1) the details of the 3.6% flotation cost and how much is associated with the underwriting spread, company issuance costs, market pressure, and other expenses; and (2) the equity floatation costs paid by Louisville Gas & Electric over the past two years.
127. With reference to pages 59-63 of Mr. McKenzie's testimony: (1) list the screens applied to the Value Line database in establishing the Non-Utility Proxy Group; (2) indicate the justification for each of the screens applied to the companies in the Value Line Investment Survey in establishing the Non-Utility Proxy Group; (3) the companies eliminated from the group from each of the five screens; and (4) the reasons that each of the companies were eliminated.