

**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

**Request for Information to  
OAG from  
Louisville/Jefferson County Metro Government**

Respectfully submitted,

Mike O'Connell w/r/b  
GTD

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](mailto:Mike.OConnell@louisvilleky.gov)

Gregory T. Dutton

Gregory T. Dutton  
Goldberg Simpson, LLC  
9301 Dayflower Street  
Prospect, Kentucky 40059  
Telephone: 502-589-4440  
[gtdutton@goldbergsimpson.com](mailto:gtdutton@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.

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  
First Discovery Requests of Office of Attorney General from Louisville Metro

*The following RFIs pertain to the Direct Testimony of Glenn A. Watkins.*

1. Referring to pages 21-22:
  - a. Provide a copy of all workpapers supporting the derivation of the allocation factors used in the POD Method in native (live EXCEL) format.
  - b. Provide the justification for assigning each plant's investment pro-ratably to each hour.
  - c. Identify each regulatory jurisdiction that has adopted the POD method in the past ten years and identify the utility and docket number.
2. Referring to page 22, based on the test year fuel costs alone, would KU install the same mix of generation capacity as is currently installed? Please explain why or why not.
3. Referring to page 23:
  - a. In calculating hourly fuel costs by individual generating unit, did Mr. Watkins make any assumptions about differences in unit heat rates or the amount of operable capacity?
  - b. Does Mr. Watkins believe that each particular generating unit has the same heat rate and operable capacity in each operating hour? Please explain your response.
4. Referring to page 27, provide support for the statement that differences in customer densities throughout a utility's service area are the primary reason for classifying distribution plant as partially customer-related. What other factors determine how distribution plant should be classified?
5. Referring to page 35, how many of KU's postal zip codes are located solely in rural vs. solely in urban areas?
6. Clarify that the report provided in Exhibit GAW-7 was authored by the Regulatory Assistance Project and not NARUC.