

**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  
KIUC from  
Louisville/Jefferson County Metro Government**

Respectfully submitted,

Mike O'Connell w/p/b  
GTD

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## **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 KIUC from Louisville Metro

1. Has Mr. Baron developed corrected and/or alternative demand allocation factors to the test year allocation factors? If so, please provide the corrected and/or alternative demand allocation factors and supporting workpapers in live EXCEL workbooks.
2. Has Mr. Baron rerun the class cost-of-service study using either substitute or corrected demand allocation factors? If so, please provide a copy of all studies that were run in live EXCEL workbooks.
3. Has Mr. Baron determined that correcting the Company's class cost-of-service study would result in any below-cost classes becoming above-cost classes? If so, provide all workpapers in live EXCEL workbooks.
4. Please provide all workpapers previously filed in the docket in live excel format.