

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

**DATA REQUESTS OF  
LOUISVILLE GAS AND ELECTRIC COMPANY  
PROPOUNDED TO JBS SWIFT & CO.**

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to JBS Swift & Co. (“Swift”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 13, 2016.

**Instructions**

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, Swift, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if Swift receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If Swift objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground 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 requested has been destroyed or transferred beyond the control of Swift, its counsel, or its witnesses, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

## Data Requests

Mr. Wallin

1. Provide a copy of all feasibility studies and cost-benefit analyses (preliminary or otherwise) performed by or on behalf of JBS Swift of the cogeneration project being evaluated by JBS, as well as all workpapers, bids or proposals, and all other supporting documents for such studies or analyses.
2. On page 4, lines 10 through 16, of his testimony, Mr. Wallin states as follows:

However, we have a substantial steam load and the boiler house is located in proximity to the majority of our electric load and where the electrical feed enters the facility. As a result, we may have the ability to cogenerate a steady volume of power, but not likely enough to offset the entire facility load. Therefore, we could end up with a blend of cogeneration and single-cycle generation. If cost-effective, the cogeneration would be used on a regular basis while any single cycle generation (either natural gas or diesel) would be used as back-up to LG&E service and in the CSR program.

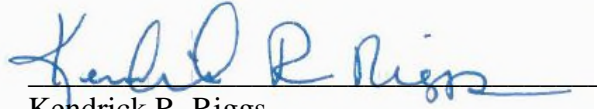
Please provide the following with respect to Mr. Wallin's testimony:

- a. What types of fuel are currently used to produce steam for JBS Swift's boiler?
- b. Please provide an approximate percentage on an MMBtu or similar basis of the fuel by fuel type currently used to generate steam on an annual basis for 2012 through and including 2016?
- c. Provide the approximate capacity (in kW) of the cogeneration unit or units that could be supported by JBS Swift's current steam load.
- d. Provide the approximate capacity (in kW) of the single-cycle generating unit that would be necessary to provide JB Swift's entire electric load in excess of the capacity that would be cogenerated.
- e. If different from the answer to sub-part d, provide the capacity of the single-cycle gas-fired generator that is currently contemplated by JBS Swift.
- f. Provide the anticipated capacity factors for the planned cogeneration unit(s).
- g. Provide the anticipated capacity factors for the planned single-cycle generating unit(s).

3. On page 5, line 11-12, Mr. Wallin states, “[W]e anticipate that our generator would have a very high run-time percentage.” Please provide the following information:
  - a. Indicate whether the statement refers to the cogeneration unit or the single-cycle generating unit or both.
  - b. Provide the anticipated run times for the cogenerating unit(s).
  - c. Provide the anticipated run times for the single-cycle generating unit(s).

Dated: March 17, 2017

Respectfully submitted,



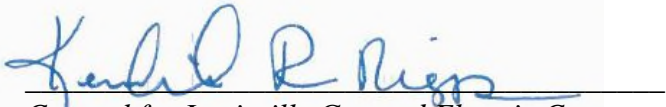
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*Counsel for Louisville Gas and Electric Company*

**CERTIFICATE OF COMPLIANCE**

This is to certify that Louisville Gas and Electric Company's March 17, 2017 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 17, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six copies, in paper medium of the Data Requests, are being mailed by U.S. First Class Mail, postage prepaid, to the Commission on March 17, 2017.



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*Counsel for Louisville Gas and Electric Company*