

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to Louisville/Jefferson County Metro Government's  
Second Request for Information  
Dated February 7, 2017**

**Question No. 24**

**Responding Witness: Counsel**

- Q-24. What are the total assets of LG&E and KU Capital LLC? Please provide all relevant documentation.
- A-24. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting base rates for LG&E beginning July 1, 2017. The total assets of LG&E and KU Capital LLC do not appear in or affect LG&E's forecasted test year or the rates derived from it. LG&E and KU Capital LLC is a non-regulated subsidiary of LG&E and KU Energy LLC that serves as a holding company for unregulated subsidiaries.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to Louisville/Jefferson County Metro Government's  
Second Request for Information  
Dated February 7, 2017**

**Question No. 25**

**Responding Witness: Counsel**

Q-25. Are the total assets and liabilities of LG&E and KU Capital LLC listed in any other public disclosure, such as Securities and Exchange Commission filing?

A-25. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting base rates for LG&E beginning July 1, 2017. The total assets of LG&E and KU Capital LLC do not appear in or affect LG&E's forecasted test year or the rates derived from it. LG&E and KU Capital LLC is a non-regulated subsidiary of LG&E and KU Energy LLC that serves as a holding company for unregulated subsidiaries. Without waiver of this objection, LG&E will supplement this response on February 20, 2017.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to Louisville/Jefferson County Metro Government's  
Second Request for Information  
Dated February 7, 2017**

**Question No. 26**

**Responding Witness: Counsel**

Q-26. What is the balance of LG&E and KU Capital LLC?

A-26. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting base rates for LG&E beginning July 1, 2017. The balance of LG&E and KU Capital LLC does not appear in or affect LG&E's forecasted test year or the rates derived from it. LG&E and KU Capital LLC is a non-regulated subsidiary of LG&E and KU energy LLC that serves as a holding company for unregulated subsidiaries.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to Louisville/Jefferson County Metro Government's  
Second Request for Information  
Dated February 7, 2017**

**Question No. 27**

**Responding Witness: Counsel**

Q-27. Is LG&E and KU Capital LLC regulated by any entity, be it another business organization, a government agency, or any legal rules and regulations?

A-27. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting base rates for LG&E beginning July 1, 2017. This information does not appear in or affect LG&E's forecasted test year or the rates derived from it. LG&E and KU Capital LLC is a non-regulated subsidiary of LG&E and KU Energy LLC that serves as a holding company for unregulated subsidiaries. Without waiver of this objection, LG&E will supplement this response on February 20, 2017.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to Louisville/Jefferson County Metro Government's  
Second Request for Information  
Dated February 7, 2017**

**Question No. 28**

**Responding Witness: Counsel**

Q-28. What are LG&E and KU Capital LLC's sources of funding?

A-28. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting base rates for LG&E beginning July 1, 2017. This information does not appear in or affect LG&E's forecasted test year or the rates derived from it. LG&E and KU Capital LLC is a non-regulated subsidiary of LG&E and KU Energy LLC that serves as a holding company for unregulated subsidiaries.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to Louisville/Jefferson County Metro Government's  
Second Request for Information  
Dated February 7, 2017**

**Question No. 29**

**Responding Witness: Counsel**

Q-29. Are LG&E and KU Capital LLC's assets and liabilities documented elsewhere in any format? If so, please provide all relevant documents.

A-29. Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting base rates for LG&E beginning July 1, 2017. This information does not appear in or affect LG&E's forecasted test year or the rates derived from it. LG&E and KU Capital LLC is a non-regulated subsidiary of LG&E and KU Energy LLC that serves as a holding company for unregulated subsidiaries.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to Second Request for Information  
of Kentucky Industrial Utility Customers, Inc.  
Dated February 7, 2017**

**Question No. 9**

**Responding Witness: Counsel**

Q.2-9. Refer to the Attachment 2 to the response to KIUC 1-28.

- a) Provide a complete copy of this attachment with no redactions.
- b) Identify the person(s), employer(s), and position(s) who redacted sections of Attachment 2.
- c) For each redaction, describe the content of the redaction, provide all reasons why the content was redacted, and explain why the Company believes that the content should be redacted in this proceeding.

A.2-9. a) – c) Objection. The requested information is irrelevant to the subject matter of this proceeding, namely setting base rates for LG&E beginning July 1, 2017. The redacted data is non-responsive information regarding an entity that is not a party to the case, and does not charge any party to the case via intercompany transactions. Without waiver of this objection, LG&E will supplement subpart b) of this response on February 20, 2017.