

**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 THE U.S. DEPARTMENT OF DEFENSE  
AND ALL OTHER FEDERAL EXECUTIVE AGENCIES**

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to the U.S. Department of Defense and all other Federal Executive Agencies (“DoD/FEA”), 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, DoD/FEA, 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 DoD/FEA 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 DoD/FEA 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 DoD/FEA, 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. Selecky

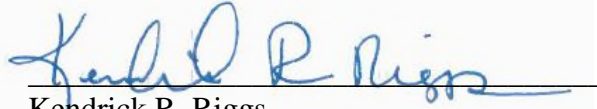
1. Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Selecky in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Selecky, please provide an electronic version of those documents with all formulas intact.
2. Provide all cost support or other analysis to support the 50% factor shown on line 9 of Exhibit JTS-1.
3. Please explain whether the 50% factor shown on line 9 of Exhibit JTS-1 was based on a detailed cost analysis of the cost per kW of the 34 kV system.

### Mr. Walters

4. Refer to Exhibit CCW-18 at page 4 of 4. Please provide a complete copy of the information described in the footer as “Standard and Poors Global Credit Portal, downloaded November 18, 2016.”
5. Please provide copies of all electronic files used in the preparation of Mr. Walters’ testimony exhibits with all data and formulas intact.
6. Please provide copies of all articles, publications, and other sources documents referenced in Mr. Walters’ testimony and exhibits.
7. Please provide a complete explanation for Mr. Walters’ decision to exclude authorized common equity ratios decided in Arkansas, Florida, Indiana, and Michigan from the analysis shown on page 26, Table 5. Please provide a complete list of all data excluded by Mr. Walters on this basis.
8. Is Mr. Walters aware of any investment analyst reports that advise investors to consider growth in GDP as a ceiling on the long-run growth rate for an electric utility or gas utility stock, or specifically references expected growth in GDP in developing its expectations or advising investors as to the utility’s future prospects? If so, please provide copies of all such reports.

Dated: March 17, 2017

Respectfully submitted,



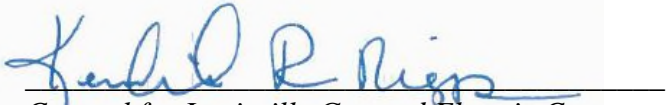
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*Counsel for Louisville Gas and Electric Company*

**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*