

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS &)	
ELECTRIC COMPANY FOR AN ADJUSTMENT)	CASE NO.
OF ITS ELECTRIC AND GAS RATES AND FOR)	2016-00371
CERTIFICATES OF PUBLIC CONVENIENCE AND)	
NECESSITY)	

**ATTORNEY GENERAL'S RESPONSES TO DATA REQUESTS
OF LOUISVILLE / JEFFERSON COUNTY METRO GOVERNMENT**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits the following responses to data requests of Louisville / Jefferson County Metro Government.

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL



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Certificate of Service and Filing

Counsel certifies that: (a) the foregoing is a true and accurate copy of the same document being filed in paper medium; (b) pursuant to 807 KAR 5:001 § 8(7)(c), there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and (c) the original and six copies in paper medium are being filed with the Commission no later than two (2) business days following the electronic filing.

this 31st day of March, 2017



Assistant Attorney General

WITNESS/RESPONDENT RESPONSIBLE:
GLENN WATKINS

QUESTION No. 1
Page 1 of 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.

RESPONSE:

- a. The Excel workpapers and electronic spreadsheet relevant to this request have previously been provided by the OAG.

See files:

TAI_Prob_Dispatch_with_100_percent_Demand.xls

TAI_Prob_Dispatch_with_Time_Fuel_and_Customer-Demand_Split.xls

Completed_3_Probability_of_Dispatch_LGE_-_Using_Gross_PLT.xls

Completed_1_Probability_of_Dispatch_LGE_-_Using_Depreciated_Reserve.xls

Hourly_Fuel_Costs_KU_and_LGE_-_With_Source_and_Meter_-adjusted.xls

- b. See Mr. Watkins' direct testimony, page 13, line 28 page 14, line 12.
- c. Mr. Watkins' does not maintain a list of class cost of service methodologies adopted for any methodology. As such, Mr. Watkins' is not aware of jurisdictions that have or have not adopted the POD method.

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of its Electric and Gas Rates and for Certificates of Public Convenience and Necessity
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WITNESS/RESPONDENT RESPONSIBLE:
GLENN WATKINS

QUESTION No. 2
Page 1 of 1

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.

RESPONSE:

See OAG's response to Kentucky League of Cities Data Request to OAG no. 2 (a) in Case No. 2016-00370.

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WITNESS/RESPONDENT RESPONSIBLE:
GLENN WATKINS

QUESTION No. 3
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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.

RESPONSE:

- a. Mr. Watkins' made no assumptions in calculating hourly fuel costs. Rather, he relied upon the Company's responses to discovery that provided hourly dispatch of generating units for the Forecasted Test Year along with forecasted monthly fuel costs by generating unit.
- b. No. See the Company's FERC Form 1.

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WITNESS/RESPONDENT RESPONSIBLE:
GLENN WATKINS

QUESTION No. 4
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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?

RESPONSE:

Please refer to Mr. Watkins' entire discussion regarding the classification of distribution plant on pages 27 through 44 of his direct testimony.

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WITNESS/RESPONDENT RESPONSIBLE:
GLENN WATKINS

QUESTION No. 5
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Referring to page 35, how many of KU's postal zip codes are located solely in rural vs. solely in urban areas?

RESPONSE:

See OAG's response to Kentucky League of Cities Data Request to OAG no. 4 in Case No. 2016-00370.

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WITNESS/RESPONDENT RESPONSIBLE:
GLENN WATKINS

QUESTION No. 6
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Clarify that the report provided in Exhibit GAW-7 was authored by the Regulatory Assistance Project and not NARUC.

RESPONSE:

Confirmed. Please also refer to Mr. Watkins' Schedule GAW-7, and to Mr. Watkins' response to Commission Staff Data Request to the OAG no. 4, Case No. 2016-00371.

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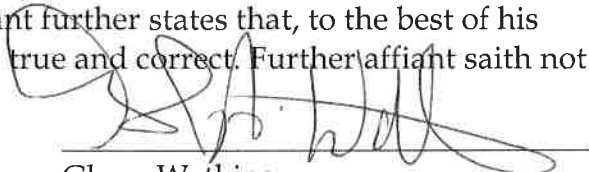
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AFFIDAVIT OF Glenn Watkins

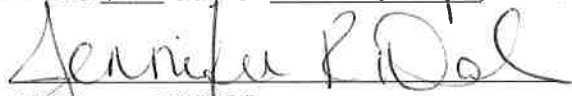
Commonwealth of Virginia)
)
)

Glenn Watkins, being first duly sworn, states the following: The prepared Pre-Filed Direct Testimony and the Schedules attached thereto constitute the direct testimony of Affiant in the above-styled case. Affiant states that he would give the answers set forth in the Pre-Filed Direct Testimony if asked the questions propounded therein. Affiant further states that, to the best of his knowledge, his statements made are true and correct. Further affiant saith not.



Glenn Watkins

SUBSCRIBED AND SWORN to before me this 17th day of February, 2017.



NOTARY PUBLIC

My Commission Expires: 10/31/2018

