

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN ADJUSTMENT) CASE No.
OF ITS ELECTRIC RATES AND FOR CERTIFICATES) 2016-00370
PUBLIC CONVENIENCE AND NECESSITY)

-and-

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

**ATTORNEY GENERAL'S RESPONSES TO SUPPLEMENTAL DATA REQUEST
OF LOUISVILLE GAS & ELECTRIC Co. and KENTUCKY UTILITIES Co.**

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 Gas & Electric Co. and Kentucky Utilities Co. in the above-styled matters.

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 27th day of April, 2017



Assistant Attorney General

-and-

Attorney General's Responses to Data Requests of Louisville Gas & Electric Co. and Kentucky Utilities Co.

WITNESS/RESPONDENT RESPONSIBLE:
GLENN WATKINS

QUESTION No. 1
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Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Watkins in connection with supplemental testimony filed in this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Watkins, please provide an electronic version of those documents with all formulas intact.

RESPONSE:

The referenced files are being uploaded separately.

The following files contain information subject to pending petitions for confidentiality and are thus provided to the Commission and Companies in accordance with Commission regulations:

1. "Updated Forecasted Hourly Fuel Costs KU and LGE-With Source and Meter-adjusted"
2. "Fuel Costs Using Historical Demand and Losses allocated (2)"
3. "Loss Factor Updated Forecasted Hourly Fuel Costs KU and LGE With Source Meter adjusted Historical"
4. "Summary File Probability of Dispatch Historical with Loss Factors to Calculate Source"
5. "1 Probability of Dispatch LGE Depreciation Reserve Historical with Calculated Loss"
6. "1 Revised Probability of Dispatch LGE - Depreciation Reserve and Historical Loads"
7. "1 Revised Probability of Dispatch LGE - Depreciation Reserve and updated Forecasted Loads"
8. "3 Probability of Dispatch LGE Investment Historical with Calculated Loss"
9. "3 Revised Probability of Dispatch LGE - Investment and Historical Loads"
10. "3 Revised Probability of Dispatch LGE - Investment and updated Forecasted Loads"
11. "Historical At Source using loss factors"
12. "2 Probability of Dispatch KU Depreciation Reserve Historical with Calculated Loss"
13. "2 Revised Probability of Dispatch KU - Depreciation Reserve and Historical Loads"
14. "2 Revised Probability of Dispatch KU - Depreciation Reserve and updated Forecasted Loads"
15. "4 Probability of Dispatch KU Investment Historical with Calculated Loss"
16. "4 Revised Probability of Dispatch KU - Investment and Historical Loads"
17. "4 Revised Probability of Dispatch KU - Investment and updated Forecasted Loads"