

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY AND KENTUCKY UTILITIES)	
COMPANY FOR A CERTIFICATE OF)	CASE NO. 2018-00005
PUBLIC CONVENIENCE AND NECESSITY)	
FOR FULL DEPLOYMENT OF ADVANCED)	
METERING SYSTEMS)	

DATA REQUEST OF
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO THE KENTUCKY ATTORNEY GENERAL

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data request to the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“AG”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on January 26, 2018, and later amended on March 6, 2018.

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, the AG, 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 the AG 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 the AG 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 the AG, 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.

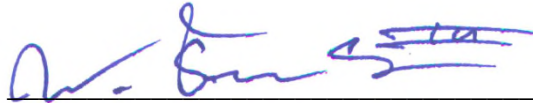
9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Request

1. Refer to the table on page 18 of Mr. Alvarez's testimony. Provide a full copy of the evaluations regarding Xcel Energy and Duke Energy cited in the table, as well as all supporting data, spreadsheets, analyses, communications, work-papers, and other documents Mr. Alvarez or his team reviewed, created, or relied upon in conducting or drafting the evaluations cited. Please provide all spreadsheets in native format with formulas intact.

Dated: May 29, 2018

Respectfully submitted,



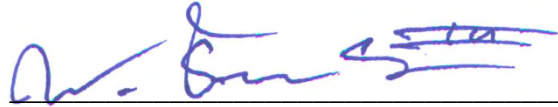
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*Counsel for Kentucky Utilities Company
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CERTIFICATE OF COMPLIANCE

This is to certify that Kentucky Utilities Company's and Louisville Gas and Electric Company's May 29, 2018 electronic filing of the Data Request 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 May 29, 2018; 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 Request, are being mailed by U.S. First Class Mail, postage prepaid, to the Commission on May 29, 2018.

A handwritten signature in blue ink, appearing to read "A. G. ...", is written above a horizontal line.

*Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company*