

**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 PUBLIC) CASE NO. 2018-00005
CONVENIENCE AND NECESSITY FOR FULL)
DEPLOYMENT OF ADVANCED METERING SYSTEMS)**

**SUPPLEMENTAL DATA REQUESTS OF
METROPOLITAN HOUSING COALITION
TO LOUISVILLE GAS & ELECTRIC COMPANY**

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Dated: April 27, 2018

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to

provide full and complete answers to any request, "you" or "your" may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "Company" or "LG&E" means Louisville Gas & Electric Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates including PPL Corporation.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Metropolitan Housing Coalition. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are

requested, each witness should respond individually to the information request.

7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

SUPPLEMENTAL DATA REQUESTS PROPOUNDED TO LOUISVILLE GAS AND ELECTRIC COMPANY BY METROPOLITAN HOUSING COALITION

Question 1-1

In answer to Question 19 of the First Set of Data Requests, "since Advance Metering is in use, this information should be available to LG&E. Will the change in the way data on utility usage is collected through Advanced Metering make utility usage by a customer more accessible to law enforcement, government agencies or any other group than is currently the case?", LG&E referred to their company policy at <https://lge-ku.com/privacy> . That policy says that LG&E will share information if there is a court order, subpoena or other compulsory process or by operation by law.

- a. How many times in the last five years was there a court order or subpoena or other compulsory process to share information and what were the case name and number?
- b. What is the internal process for LG&E to respond to the court order or subpoena or other compulsory process to share information, and to decide whether or not to provide that information?
- c. Was notice sent to the customer when a court order or subpoena was received that would potentially result in disclosure of that customers' information?
- d. What is the company policy of notifying the customer when there is a court order or subpoena or other compulsory order to share information?
- e. What is the process of notifying the customer when there is a court order or subpoena or other compulsory order to share information?
- f. Is disclosure of the information postponed for a period of time in order to allow the customer to determine whether to seek administrative or judicial relief against such disclosure?

- g. Has LG&E contested any court order, subpoena or other compulsory process in the last five years?
1. If the answer was yes, what were the case names and numbers ?
 2. If the answer was yes, what were the grounds for contesting?

Question 1-2

How long is customer account data retained currently?

Question 1-3

How long will customer account data be retained under the proposed Advanced Metering deployment?

Question 1-4

How will data under Advanced Metering be retained and protected against hacking and against unauthorized disclosure?

Question 1-5

Will LG&E share customer information with a third party without first obtaining explicit consent from the customer for each such request for sharing?

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that electronic version of the First Set of Data Requests Propounded to Louisville Gas and Electric Company by Metropolitan Housing Coalition 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 April 27, 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 (6) copies in paper medium of the Supplemental Data Requests Propounded to Louisville Gas and Electric Company by Metropolitan Housing Coalition will be delivered by priority mail within two (2) business day of April 27, 2018 to the Commission.



Tom FitzGerald