

**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 )**

**POST-HEARING DATA REQUESTS OF  
METROPOLITAN HOUSING COALITION  
TO LOUISVILLE GAS & ELECTRIC COMPANY**

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Metropolitan Housing Coalition

Dated: July 26, 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.

**POST-HEARING DATA REQUESTS PROPOUNDED TO LOUISVILLE GAS AND ELECTRIC COMPANY BY METROPOLITAN HOUSING COALITION**

Question 1-1

Please provide the per-unit cost for the current meters utilized in the LG&E system, and the per-unit cost of the proposed advanced meters for which LG&E has requested the CPCN.

Question 1-2

Please provide the monthly cost to a residential customer for the current generation of electric meters deployed by LG&E, and the number of years for which the customers will pay that monthly cost.

Question 1-3

Please provide the monthly costs that would be paid by a residential customer for the advanced meter deployment, if approved, and identify the number of years during which the residential customer of LG&E will be paying a monthly cost for both the current generation of meters and the advanced meters.

Question 1-4

How long is the manufacturer's warranty for the proposed gas meter index, exclusive of the battery warranty?

Respectfully submitted,

A handwritten signature in black ink, consisting of a large initial 'D' followed by a series of loops and a long horizontal stroke.

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*Counsel for Intervener, Metropolitan  
Housing Coalition*

### **CERTIFICATE OF SERVICE**

This is to certify that electronic version of the Post-Hearing 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 July 26, 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 First Set of Data Requests Propounded to Louisville Gas and Electric Company by Metropolitan Housing Coalition will be delivered by priority mail within two (2) business days of July 26, 2018 to the Commission.



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Tom FitzGerald