

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**ATTORNEY GENERAL'S RESPONSE TO THE DATA REQUEST  
OF KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND  
ELECTRIC COMPANY**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits the following response to the data request of Kentucky Utilities Company and Louisville Gas and Electric Company ("Companies") in the above-styled matter.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for  
Certificates of Public Convenience and Necessity for Full Deployment of Advanced Metering Systems  
Case No. 2018-00005  
Attorney General's Responses to the Data Request  
of Kentucky Utilities Company and Louisville Gas and Electric Company

WITNESS/RESPONDENT RESPONSIBLE:

Paul J. Alvarez/Counsel as to Objections

QUESTION No. 1

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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.

RESPONSE:

Objection. The Attorney General and Mr. Alvarez are unable to provide much of the information requested by the Companies due to the confidentiality of the documents and items requested. It is the Attorney General's understanding that the workpapers the Companies seek in the Excel Energy and Duke Energy evaluations were not made public and are the property of the clients of each evaluation (Xcel Energy and the Public Utilities Commission of Ohio). Furthermore, the Attorney General objects to the Companies' request on the basis that it is unreasonable, overbroad and unduly burdensome in that it seeks "*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" from evaluations conducted 7-8 years ago.<sup>1</sup> Finally, the Attorney General objects to the Companies' instruction number 9, wherein the Companies require "[i]f 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." The Companies' data request seeks public and confidential information from an evaluation referenced on page 18 of Mr. Alvarez's testimony. Along with introducing the two evaluations cited on page 18, Mr. Alvarez provided citations to both dockets where all public information of record is located. To the extent such information is publicly available from the cited dockets, such information is, and has been since before their request was propounded, equally available to the Companies for review. If the Companies have issues finding the referenced dockets, the Attorney General is willing to work with counsel to address same.

Without waving said objections, and to the extent discoverable, reference is made to the two attachments uploaded concurrent with this response. These

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<sup>1</sup> Emphasis added.

Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for  
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documents are the final public evaluations or assessments of the Xcel Energy and Duke Energy projects identified on page 18 of Mr. Alvarez's testimony.

The items are identified in the upload as:

SmartGridCity Evaluation Report - FINALv10\_ 10132011

Final\_Public\_Version\_2011-06-30\_DEO\_Audit\_and\_Assessment