# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

#### In the Matter of:

ELECTRONIC JOINT APPLICATION OF	)	
LOUISVILLE GAS AND ELECTRIC	)	
COMPANY AND KENTUCKY UTILITIES	)	CASE NO. 2018-00003
COMPANY FOR CERTIFICATES OF PUBLIC	)	
CONVENIENCE AND NECESSITY FOR FULL	)	
DEPLOYMENT OF ADVANCED METERING	)	
SYSTEMS	)	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND
KENTUCKY UTILITIES COMPANY
TO COMMISSION STAFF'S HEARING AND POST-HEARING
REQUEST FOR INFORMATION
DATED JULY 26, 2018

**FILED: JULY 31, 2018** 

#### **VERIFICATION**

COMMONWEALTH OF KENTUCKY	)	
	)	SS:
COUNTY OF JEFFERSON	)	

The undersigned, **John P. Malloy**, being duly sworn, deposes and says that he is Vice President – Gas Distribution for Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

John P. Malloy

Subscribed and sworn to before me, a Notary Public in and before said County

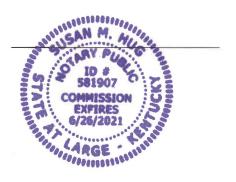
and State, this 3 day of

2018.

Notary Public

(SEAL)

My Commission Expires:



Case No. 2018-00005

## **Hearing Request No. 1**

Witness: John P. Malloy

- Q-1. What are the Meter Operations Center costs and where are they in the AMS Business Case?
- A-1. Please see page 49 of Exhibit JPM-1 attached to the Direct Testimony of John P. Malloy. Please see also the Companies' response to AG 2-13.

Case No. 2018-00005

## **Hearing Request No. 2**

Witness: John P. Malloy

- Q-2. Provide a breakdown of the \$108.8 million of recurring O&M shown in the verified informational update.
- A-2. Please see page 46 of Exhibit JPM-1 attached to the Direct Testimony of John P. Malloy. Please see also the Companies' response to AG 2-13.

Case No. 2018-00005

**Hearing Request No. 3** 

Witness: John P. Malloy

- Q-3. Was accumulated deferred income tax included in Tax Cuts and Jobs Act calculations contained in the July 3rd verified informational update?
- A-3. Yes.

#### Case No. 2018-00005

#### **Question No. 1**

Witness: John P. Malloy

- Q-1. Refer to KU/LG&E's response to Commission Staff's First Request for Information, Item 48. Provide the table in Excel spreadsheet format with formulas intact and unprotected, and all rows and columns fully accessible.
- A-1. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

The referenced table is attached as requested (Attachment 1), however it does not take into account the effects of the Tax Cuts and Jobs Act and is an output of the confidential attachment provided in response to AG 1-34. Therefore, an updated version of the table that includes the effects of the TCJA, as well as the financial model from which the table is calculated, are also attached (Attachment 2 and Confidential Attachment 3, respectively). The referenced table is contained in the tab labeled "CEM Inputs" in Attachment 3.

Attachments 1 and 2 are being provided in separate files in Excel format.

Attachment 3 is

Confidential and
provided under seal in
a separate file in Excel
format.