Data Request No. 1:

Provide DOD’s proposed revenue allocation for each class of customer in an electronic spreadsheet similar to pages 27-28 of WSS-28 and pages 29-30 of WSS-29. The spreadsheet should include the dollar amount of DOD’s proposed increase to each rate class, which is based on the DOD-proposed revenue allocation shown in column 4 of JTS-3 of the testimony of James T. Selecky, and the utility’s resulting rate of return for each rate class.

Response:

The DoD did not develop a revenue allocation for each individual class of customer or rate class in an electronic spreadsheet that shows the resulting rates of return. Exhibit JTS-3 utilizes LG&E’s proposed increase but does not reflect the increase that DoD would recommend in this case. DoD’s position on the rate of return on common equity and book depreciation rates would reduce the revenue increase from the level proposed by the Company.

Also, DoD is proposing a different cost of service methodology than the cost of service methodology proposed by LG&E in this case. Because of these factors, the spreadsheet requested was not prepared.
VERIFICATION

STATE OF MISSOURI  )
COUNTY OF ST. LOUIS )
SS:

The undersigned, James T. Selecky, being duly sworn, deposes and says that he is a Principal of Brubaker & Associates, Inc., 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.

[Signature]
James T. Selecky

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 7th day of February 2019.

[Signature]
Maria E. Decker
Notary Public

My commission expires: May 5, 2021