

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC APPLICATION OF )**  
**KENTUCKY UTILITIES COMPANY FOR AN )** **CASE NO. 2018-00294**  
**ADJUSTMENT OF ITS RATES )**

**ELECTRONIC APPLICATION OF )**  
**LOUISVILLE GAS AND ELECTRIC )** **CASE NO. 2018-00295**  
**COMPANY FOR AN ADJUSTMENT OF ITS )**  
**ELECTRIC AND GAS RATES )**

**DATA REQUESTS OF**  
**KENTUCKY UTILITIES COMPANY AND**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**PROPOUNDED TO THE KENTUCKY ATTORNEY GENERAL,**  
**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT AND**  
**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“AG”), Louisville/Jefferson County Metro Government (“Lou Metro”) and Lexington-Fayette Urban County Government (“LFUCG”) to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on October 11, 2018.

**Instructions**

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, the AG, Lou Metro and LFUCG, its witnesses, or its counsel.

2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if the AG, Lou Metro and LFUCG receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If the AG, Lou Metro and LFUCG object to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of the AG, Lou Metro and LFUCG, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its

destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If 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.

## Data Requests

### Lexington-Fayette Urban County Government

1. Provide a copy of any agreement between the AG, Lou Metro and LFUCG regarding their joint participation in this proceeding.

### Louisville/Jefferson County Metro Government

2. Provide a copy of any agreement between the AG, Lou Metro and LFUCG regarding their joint participation in this proceeding.

### Attorney General

3. Provide a copy of any agreement between the AG, Lou Metro and LFUCG regarding their joint participation in this proceeding.

### Ms. Mullinax

4. Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all work papers supporting your testimony, analyses, and conclusions.
5. Reference Mullinax Testimony, p. 28. Provide any studies or analyses relied upon by you that support the contention that employees and employers consider various components of compensation and benefits in isolation rather than considering them holistically or in the aggregate when making employment decisions.
6. Reference Mullinax Testimony, pp. 28–29. Provide detailed characteristics and parameters that should be used to form a proxy group by which a utility's compensation and benefits may be compared. The answer should include all characteristics that you think should be included (including company size, location, area of business, etc.) and define those parameters of any such characteristic.
7. Reference Mullinax Testimony, pp. 30–31. Please state whether Ms. Mullinax is aware of the Commission's decision in the recent Duke Energy case (Case No. 2017-00321) on the issue of the recovery of matching 401(k) contributions made to those participating in a pension plan. If so, describe why the Commission should not reach the same conclusion in the Companies' cases as it reached in Case No. 2017-00321 on this issue.

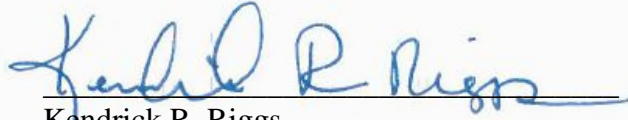
### Mr. Watkins

8. Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all work papers supporting your testimony, analyses, and conclusions.

9. Watkins Testimony, footnote 7, p. 6: Why were Trimble County Units 5 and 6 and Brown Units 5, 6, and 7 considered “intermediate” units, while other similar combustion turbines were considered “peakers?”
10. Refer to Schedule GAW-3.
  - a. Explain the “(1)” noted for Dix Dam 1 and Ohio Falls 1.
  - b. Explain how Dix Dam 1 can have a capacity factor of 83.13%.
  - c. Explain how Ohio Falls 1 can have a capacity factor of 263.03%.
11. Refer to page 22, lines 7-11. Provide specific citations to the referenced testimony supporting the statement “that the primary objective of the Companies residential rate design is to guarantee revenue collection and profitability.”
12. Refer to page 32. Provide all Commission orders in any jurisdiction where Mr. Watkins’ “direct customer cost analysis” has been specifically accepted in setting customer charges for residential customers.

Dated: January 31, 2019

Respectfully submitted,

A handwritten signature in blue ink that reads "Kendrick R. Riggs". The signature is written in a cursive style and is positioned above a horizontal line.


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*Counsel for Kentucky Utilities Company  
and Louisville Gas and Electric Company*

**CERTIFICATE OF COMPLIANCE**

This is to certify that Kentucky Utilities Company's and Louisville Gas and Electric Company's January 31, 2019 electronic filing of the Data Requests 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 January 31, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original in paper medium of the Data Requests will be hand-delivered to the Commission within two business days from the date of the electronic filing.

  
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*Counsel for Kentucky Utilities Company  
and Louisville Gas and Electric Company*