

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **John K. Wolfe**, being duly sworn, deposes and says that he is Vice President, Electric Distribution for Kentucky Utilities Company and 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 K. Wolfe

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 7th day of December 2018.



Notary Public

My Commission Expires:
Judy Schooler
Notary Public, ID No. 603967
State at Large, Kentucky
Commission Expires 7/11/2022

LOUISVILLE GAS & ELECTRIC COMPANY

**December 6, 2018 Supplemental Response to
to Attorney General's Initial Data Requests for Information
Dated November 13, 2018**

Case No. 2018-00295

Question No. 177

Responding Witness: John K. Wolfe

Q-177. Refer to the direct testimony of Paul W. Thompson, page 8.

- a. Provide a narrative explanation as to how the Companies calculated the avoided customers interruptions and minutes due to the installation of electronic reclosers. Provide all workpapers used in determining these amounts in executable electronic format, preferably in native Excel format, with all formulas intact and cells unprotected and with all columns and rows accessible.
- b. Provide the actual and budgeted costs of installing the 350 electronic reclosers, broken out by Capital and O&M.
- c. Confirm that due to the magnitude of the referenced July 2018 Storms, impacts arising from them would not be included in the calculation of System Average Interruption Frequency Index ("SAIFI") and System Average Interruption Duration Index ("SAIDI"). If this cannot be confirmed, explain why not.
- d. Provide the SAIDI and SAIFI information in Exhibit LEB-5 that is redacted, specifically the redacted information on page 4 of 16 through page 8 of 16.

A-177. **Original Response:**

- a. For each instance when a DA recloser operates to isolate a fault, the number of customers affected by the outage is compared to the number of customers who would have been affected if the recloser had not been in place. This difference determines the number of Customer Interruptions (CI) saved by the recloser. The outage duration, which is the time required for crews to arrive at the damage location and make repairs, is assumed to be the same in both cases. Thus, Customer Minutes of Interruption (CMI) saved is determined by multiplying the difference in the number of customers affected by the outage duration. See attached.
- b. All costs are Capital for the combined Companies.

Actual Cost: \$20,838,888

Forecasted Cost: \$21,975,977

Original Budgeted Cost: \$22,243,937

- c. It is confirmed that due to the magnitude of the referenced July 2018 Storms, impacts arising from them would not be in calculations of System Average Interruption Frequency Index (“SAIFI”) and System Average Interruption Duration Index (“SAIDI”) that exclude major event days (values typically reported).
- d. The referenced section of LEB-5 contains the Companies’ combined historical SAIDI and SAIFI performance charted against first, second and third quartile performance according to two different industry surveys. The quartile data from these surveys is subject to strict confidentiality obligations imposed by the survey entities. The Companies have sought consent from each survey entity to provide the information responsive to this request. Both entities have refused consent. The Companies are still negotiating for appropriate disclosure of the requested information.

December 6, 2018 Supplemental Response for Question 177(d):

- d. The referenced section of LEB-5 contains the Companies’ combined historical SAIDI and SAIFI performance charted against first, second and third quartile performance according to two different industry surveys. The quartile data from these surveys is subject to strict confidentiality obligations imposed by the survey entities. The Companies have sought consent from each survey entity to provide the information responsive to this request. Both entities have refused consent to disclosure of the redacted information as it appears in Exhibit LEB-5. The Companies are producing a modified disclosure that contains the same basic information as two of the redacted graphics from one survey. See attached. The information provided is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection. The Companies are continuing to negotiate for disclosure of the requested information from the second survey.

The entire attachment is
Confidential and
provided separately
under seal.