

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

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

**ATTORNEY GENERAL’S INITIAL DATA REQUESTS TO KIUC**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Initial Data Requests to Kentucky Industrial Utility Customers [“KIUC”]. These data requests are to be answered by the date specified in the Commission’s Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for KIUC with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if KIUC receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If KIUC has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings

and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis 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.

(12) In the event any document called for has been destroyed or transferred beyond the control of the organization, 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 destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



REBECCA W. GOODMAN  
LAWRENCE W. COOK  
KENT A. CHANDLER  
JUSTIN M. McNEIL  
ASSISTANT ATTORNEYS GENERAL  
700 CAPITOL AVE., STE. 20  
FRANKFORT KY 40601  
(502) 696-5453  
FAX: (502) 573-8315  
[Rebecca.Goodman@ky.gov](mailto:Rebecca.Goodman@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[Kent.Chandler@ky.gov](mailto:Kent.Chandler@ky.gov)  
[Justin.McNeil@ky.gov](mailto:Justin.McNeil@ky.gov)

***Certificate of Service and Filing***

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; 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.

This 31<sup>st</sup> day of January, 2019.



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Assistant Attorney General

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The Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates  
Case No. 2018-00294  
The Electronic Application of Louisville Gas And Electric Company for an Adjustment of its Electric and Gas  
Rates  
Case No. 2018-00295  
Attorney General's Initial Data Requests to KIUC

1. Reference the Direct Testimony of Mr. Lane Kollen (Kollen Direct) at pages 17-18, including his statement that “capital expenditures are incurred as the result of a budgeted process in which capital projects are identified and then prioritized based on various factors, primarily need and capital constraints.” Further reference is made to page 19.
  - a. Other than the instance referenced on page 19, based upon Mr. Kollen’s experience appearing before the Kentucky Public Service Commission, is he aware of any instances where jurisdictional utilities amended or altered their capital plans and priorities based on outcomes of regulatory proceedings, or any instances where jurisdictional utilities have indicated they will amend or alter their capital plans and priorities based on outcomes of regulatory proceedings (i.e. reduction in revenue requirement requests, denial of CPCNs, etc.)?
2. Reference Kollen Direct, page 27, lines 24–26, wherein he discusses the Phoenix Paper Wickliffe new load. Provide the source and/or calculation for the additional revenues of \$7.62 million included in the Phoenix revenues adjustment.
3. Reference the Direct Testimony of Mr. Stephen J. Baron (Baron Direct) generally, including his critique of Mr. Seelye’s Loss of Load Probability (LOLP) method.
  - a. Does Mr. Baron believe that Mr. Seelye’s LOLP was performed in accordance with the National Association of Regulatory Utility Commissioners’ Electric Utility Cost Allocation Manual? Explain any response.
  - b. Does Mr. Baron believe Mr. Seelye’s LOLP allocated production plant costs to classes using appropriate allocation factors for each of the three rating periods (i.e. peak hours, intermediate or shoulder hours, and base loading hours)?
4. Reference Baron Direct at 10, lines 9-10, wherein he mentions factors regulators may consider in allocating revenue, such as “competitive issues and the impact on economic development.”
  - a. Explain what Mr. Baron means by “competitive issues and the impact on economic development.”
  - b. Explain, in complete detail, if “competitive issues and the impact on economic development” are items regulators, including the Kentucky Public Service Commission, can consider in setting rates.
5. Reference Baron Direct, wherein Mr. Baron discusses the 12 CP cost study he conducted.
  - a. From what data set did Mr. Baron ascertain his 12 peaks?