

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE ATTORNEY GENERAL'S POST-HEARING DATA REQUESTS
FOR INFORMATION
DATED MARCH 11, 2019

FILED: MARCH 20, 2019

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Gregory J. Meiman**, being duly sworn, deposes and says that he is Vice President, Human Resources 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.


Gregory J. Meiman

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 19th day of March 2019.


Notary Public

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

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Attorney General's Post-Hearing Data Requests for Information
Dated March 11, 2019**

Case No. 2018-00295

Question No. 1

Responding Witness: Gregory J. Meiman

- Q-1. March 5, 2019 Video Testimony Evidence ["VTE"] at 2:29:50. Provide a table in the form of that provided as a response to Commission Staff Post-Hearing Data Request ["PHDR"] 1-11, attachment 2, page 1 of 1 in Case No. 2016-00371, updated for the amounts in these matters. The table should include all of the same type of information, presented in the same manner, and broken out the same way between utilities and jurisdiction as the PHDR in Case No. 2016-00371, but updated with the corresponding amounts for the current period.
- A-1. See attached for 2018 actuals.

Employees who participate in both the Retirement Plan - eligible if hired prior to 1/1/06 and the 401(k) Company Match

	Bargaining Unit	Exempt	Hourly	Manager	Non-exempt	Officer & Director	Total
401k participant count - pension	348	607	230	123	274	63	1,645
401k Company Match - pension	1,362,652.04	2,719,513.79	993,749.04	796,770.21	805,366.16	564,819.40	7,242,870.64

Entity Split	%	\$	\$	\$	\$	\$	\$	\$
LG&E	46.94%	639,615	1,276,512	466,456	373,996	378,031	265,121	3,399,730
KU	52.87%	720,434	1,437,807	525,395	421,253	425,797	298,620	3,829,307
Other	0.19%	2,603	5,194	1,898	1,522	1,538	1,079	13,834
Total		1,362,652	2,719,514	993,749	796,770	805,366	564,819	7,242,871

LG&E Split	%	\$	\$	\$	\$	\$	\$	\$
Electric	73.08%	467,456	932,925	340,904	273,331	276,280	193,760	2,484,655
Gas	26.92%	172,159	343,587	125,552	100,665	101,751	71,360	915,075

LG&E Electric Operating Expense Split	%	\$	\$	\$	\$	\$	\$	\$
Operating Expense	73.45%	343,354	685,249	250,400	200,766	202,932	142,320	1,825,022
Less: Mechanism	0.49%	1,681	3,355	1,226	983	994	697	8,936
LG&E Electric Jurisdictional Operating Expense		341,673	681,894	249,174	199,783	201,938	141,623	1,816,086

LG&E Gas Operating Expense Split	%	\$	\$	\$	\$	\$	\$	\$
Operating Expense	75.61%	130,175	259,797	94,933	76,116	76,937	53,957	691,915
Less: Mechanism	0.52%	683	1,363	498	399	404	283	3,629
LG&E Gas Jurisdictional Operating Expense		129,492	258,434	94,435	75,717	76,533	53,674	688,286

KU Operating Expense Split	%	\$	\$	\$	\$	\$	\$	\$
Operating Expense	68.66%	494,677	987,252	360,756	289,248	292,368	205,044	2,629,344
Less: Mechanism	0.41%	2,011	4,014	1,467	1,176	1,189	834	10,689
KU Operating Expense		492,666	983,238	359,289	288,072	291,180	204,210	2,618,655
KU Jurisdictional Operating Expense	93.786%	462,054	922,144	336,965	270,172	273,087	191,521	2,455,943

LOUISVILLE GAS AND ELECTRIC COMPANY

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Case No. 2018-00295

Question No. 2

Responding Witness: Gregory J. Meiman

- Q-2. March 5, 2019 VTE at 2:21:54. Provide a narrative explanation of the amendments to the bargaining agreements KU is party to in regards to retirement contributions, including a description of how the language in the KU amendments effectuates the same intent and outcome as the language in the amendment to the bargaining agreement LG&E is party to.
- A-2. LG&E IBEW Collective Bargaining Agreement effective 2017- 2020: The Company and union agreed to modify the contractual language in Article 28 Section 28.07 to read as follows: Employees covered by this Agreement will participate in the company's employee savings plan on the same basis as all other regular full-time employees of the Company. Further, Section 26.01 of the agreement was amended to strike the following language regarding medical insurance from the previous agreement: "The Company will assume an increase of 4%, in each year of the contract in medical and hospitalization expense per employee, to the extent this expense increases over 4%, the employees will absorb increases up to the next 4%. Should the total increase exceed 8%, the Company and the employees will equally share in the balance of that expense."

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Attorney General's Post-Hearing Data Requests for Information
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Case No. 2018-00295

Question No. 3

Responding Witness: Gregory J. Meiman

- Q-3. March 5, 2019 VTE at 2:00:00. Provide the date on which the Companies first contacted Mercer in an effort to produce the retirement benefit study the Companies used as support in these matters. Further, provide the date in which Mercer initiated its study.
- A-3. Upon receipt of the final order in the prior case, the Companies commenced internal discussions regarding the potential analysis of benefit offerings. In late 2017, potential experts were asked to describe their analytical capabilities and availability of 2017 data. Based upon that review, Mercer was selected to perform the study. The Companies engaged Mercer to perform the study on March 9, 2018, given the timing of the most current survey data.