

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT’S REQUEST FOR
INFORMATION TO DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL
EXECUTIVE AGENCIES**

In accordance with the Public Service Commission’s (“Commission”) October 11, 2018, Order, Intervenor Louisville/Jefferson County Metro Government (“Louisville Metro”) propounds the following data requests upon the Department of Defense and all other Federal Executive Agencies (“DOD”). DOD shall respond to these requests in accordance with the provisions of the Commission’s October 11, 2018, Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate Louisville Metro’s request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for Louisville Metro.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

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

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

7. If DOD objects to any request on any grounds, please notify counsel for Louisville Metro as soon as possible.

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

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: 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.

10. These requests shall be deemed continuing so as to require further and supplemental responses if the company 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.

Respectfully submitted,



STURGILL, TURNER, BARKER & MOLONEY, PLLC
James W. Gardner
M. Todd Osterloh
333 W. Vine Street, Suite 1500
Lexington, Kentucky 40507
Telephone No.: (859) 255-8581
Facsimile No.: (859) 231-0851
jgardner@sturgillturner.com
tosterloh@sturgillturner.com

and

Mike O'Connell
JEFFERSON COUNTY ATTORNEY
600 West Jefferson St., Suite 2086
Louisville, Kentucky 40202
502-574-6333 (phone)
502-574-0009 (fax)
Mike.Oconnell @Louisvillekv.Gov
*Attorneys for Louisville/Jefferson County Metro
Government*

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the January 31, 2019, electronic filing of this document is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be 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 paper medium of the Notice of Filing will be delivered to the Commission within two business days.



Counsel for Louisville Metro

Requests for Information

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.