

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

**In the Matter of:**

<b>ELECTRONIC JOINT APPLICATION OF</b>	)	
<b>KENTUCKY UTILITIES COMPANY AND</b>	)	
<b>LOUISVILLE GAS AND ELECTRIC</b>	)	
<b>COMPANY FOR AN ORDER APPROVING</b>	)	
<b>THE ESTABLISHMENT OF REGULATORY</b>	)	<b>CASE NO. 2018-00304</b>
<b>LIABILITIES AND REGULATORY ASSETS</b>	)	
	)	

**RESPONSE OF**  
**KENTUCKY UTILITIES COMPANY AND**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**TO**  
**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**  
**DATED OCTOBER 26, 2018**

**FILED: NOVEMBER 12, 2018**







**KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY**

**Response to Commission Staff's Second Request for Information  
Dated October 26, 2018**

**Case No. 2018-00304**

**Question No. 1**

**Responding Witness: John K. Wolfe**

Q-1. Refer to the application, paragraphs 17 and 18. Provide the number of customers without power, downed wires, and damaged poles because of the July 2018 Storm, by utility.

A-1. Below are updated July 20<sup>th</sup> storm statistics by utility through October 29, 2018.

<b>Category</b>	<b>KU</b>	<b>LG&amp;E</b>	<b>Total</b>
Customers without power	112,900	61,800	174,700
Downed wires	800	560	1,360
Damaged poles	182	74	256

**KENTUCKY UTILITIES COMPANY AND  
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**Response to Commission Staff's Second Request for Information  
Dated October 26, 2018**

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**Question No. 2**

**Responding Witness: John K. Wolfe**

- Q-2. Refer to KU/LG&E's response to Commission Staff's First Request for Information (Response to Staff's First Request), Item 2(b). Provide a list of the number of damaged poles by size, and by utility.
- A-2. Below are updated July 20<sup>th</sup> storm pole statistics by size and by utility through October 29, 2018.

<b>Size (in feet)</b>	<b>KU</b>	<b>LG&amp;E</b>	<b>Total</b>
30	7	21	28
35	9	0	9
40	64	0	64
45	55	5	60
50	32	27	59
55	8	14	22
60	0	1	1
65	0	4	4
70	7	2	9
<b>Total</b>	<b>182</b>	<b>74</b>	<b>256</b>

**KENTUCKY UTILITIES COMPANY AND  
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**Response to Commission Staff's Second Request for Information  
Dated October 26, 2018**

**Case No. 2018-00304**

**Question No. 3**

**Responding Witness: Robert M. Conroy / John K. Wolfe**

- Q-3. Refer to the application, paragraph 18, regarding the statement that the July 2018 Storm ranks among the top five most damaging storms to hit the KU/LG&E system as a whole. Refer also to Response to Staff's First Request, Item 3.
- a. State whether KU/LG&E defines "damaging" in this sentence based on repair cost or some other criteria.
  - b. State whether the 2018 Storm "ranks among the top five most damaging storms to hit" the KU system, in which damaging is measured by repair cost, using constant 2018 dollars.
  - c. State whether the 2018 Storm "ranks among the top five most damaging storms to hit" the LG&E system, in which damaging is measured by repair cost, using constant 2018 dollars.
  - d. To the extent not already provided, provide further details on storms that caused as much or more damage for KU (based on repair cost, using constant 2018 dollars) than the July 2018 Storm. Include, but not limited to, a description of each storm, the number of customers impacted, the cost of each of those storm damages, the operations and maintenance (O&M) expense budgets for storm damage that were then embedded in base rates for KU, whether KU sought authority to defer those expenses, the docket number of the case, and whether the Commission approved such request.
  - e. To the extent not already provided, provide further details on storms that caused as much or more damage for LG&E (based on incremental repair cost, using constant 2018 dollars) than the July 2018 Storm. Include, but not limited to, a description of each storm, the number of customers impacted, the cost of each of those storm damages, the O&M expense budgets for storm damage that were then embedded in base rates for LG&E, whether LG&E sought authority to defer those expenses, the docket number of the case, and whether the Commission approved such request.
  - f. For KU and LG&E separately, identify any storm that caused less damage than the July 2018 Storm for which KU/LG&E sought authority to defer those expenses. For such cases, identify the docket number and whether the Commission approved the request.

- g. As previously requested, for the “Derecho” event identified in KU/LG&E’s response, provide the O&M expense budgets for storm damage that embedded in base rates for KU and LG&E during that period.

A-3.

- a. KU and LG&E do not define “damaging” in the sentence referenced in the data request as based only on repair cost. As stated in paragraphs 17, 18, 22 and 24 of the Joint Application, for purposes of the pending request for approval of the proposed regulatory assets, “damaging” refers to total outage events, number of customers affected, damage to poles and other equipment, the number of downed wires, and cost of damage relative to the amount included in existing base rates.
- b. & c. The evaluation of whether a storm represents an extraordinary event for purposes of requesting a regulatory asset is not limited to repair costs in comparison to repair costs from other storms. Because no storm event is the same, the magnitude of each event should be measured by the total outage events, number of customers affected, damage to poles and other equipment, number of downed wires, and cost of damage relative to the amount included in existing base rates.

The top five list of most damaging storms stated in paragraph 18 in the Joint Application is based upon the combined outages of KU and LG&E and not by cost. Evaluating whether the 2018 July storm ranks among the top five most damaging storms to impact the KU system, in which damage is measured only by repair cost, as requested, does not provide a reasonable comparison or evaluation. The information requested is not readily available and requires substantial original work based on a detailed analysis of the property involved with each storm and the applicable indice for the period in question. Storm damages cannot reasonably be restated in constant dollars using a single index.

In order to ensure the most efficient utilization of restoration resources, emergency preparedness and response is managed across both utilities. This approach has been extremely effective for KU and LG&E and their customers. This was confirmed when the Companies’ storm restoration efforts during the July 2018 Storm were recognized by the Director of Kentucky Emergency Management. Attached is an August 17, 2018 letter from Kentucky Emergency Management concerning the managed response across both utilities during the July 2018 Storm events.

Using the top ten combined customer outage events since 2003, the July 2018 KU storm ranking is number three when using only cost as a measure. Similarly, using the top ten combined customer outage events since 2003, the July 2018 LG&E storm is not ranked in the top five when using only cost as a measure.



- d. As noted in response to parts b and c, storm damages cannot reasonably be restated in constant dollars using a single index. The Companies rank storms according to total customers impacted on a combined utility basis. Using the top rankings of combined outages across KU and LG&E since 2003, only two storms ranked higher based on KU cost than the July 20, 2018 storm.

<b>KU Storm Event</b>	<b>KU Customers Impacted</b>	<b>KU OPEX Cost</b>	<b>KU O&amp;M Embedded in Base Rates</b>	<b>Reg Filing / Case # / Approval?</b>
Jan 2009 Ice and Feb 2009 Wind Events	368,000	\$59.9M	\$1.3M <sup>1</sup> / \$2.6M <sup>2</sup>	Reg Asset Filed: Yes Case #: 2009-00174 Approval: Yes
Feb 2003 Central Kentucky Ice Storm	140,000	\$6.6M	Unknown <sup>3</sup>	Reg Asset Filed: Yes Case #: 2003-00434 Approval: Yes

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<sup>1</sup> Case No. 2003-00434 included the storm damage O&M embedded in base rates at the time of the January 26, 2009 event.

<sup>2</sup> Case No. 2008-00251 included the storm damage O&M embedded in base rates at the time of the February 11, 2009 event.

<sup>3</sup> This information is unknown because KU had not requested a rate case in 20 years prior to 2003.

- e. As noted in response to parts b and c, storm damages cannot reasonably be restated in constant dollars using a single index. The Companies rank storms according to total customers impacted on a combined utility basis. Using the top rankings of combined outages across KU and LG&E since 2003, the following storms ranked higher based on LG&E cost than the July 20, 2018 storm.

<b>LG&amp;E Storm Event</b>	<b>LG&amp;E Customers Impacted</b>	<b>LG&amp;E OPEX Cost</b>	<b>LG&amp;E O&amp;M Embedded in Base Rates</b>	<b>Reg Filing / Case # / Approval?</b>
Jan 2009 Ice and Feb 2009 Wind Events	286,000	\$46.1M	\$2.6M <sup>4</sup> / \$4.4M <sup>5</sup>	Reg Asset Filed: Yes Case #: 2009-00175 Approval: Yes
Sep 2008 Hurricane Ike	300,000+	\$25.1M	\$2.6M	Reg Asset Filed: Yes Case #: 2008-00456 Approval: Yes
Aug 2011 Thunderstorms	126,000	\$8.4M	\$4.8M	Reg Asset Filed: Yes Case #: 2011-00380 Approval: Yes
Jul 2004 Derecho	129,000	\$8.4M	\$2.6M	Reg Asset Filed: No Case #: NA Approval: NA
Feb 2014 Ice Storm	44,200	\$3.0M	\$5.6M	Reg Asset Filed: No Case #: NA Approval: NA

- f. The Companies rank storms according to total customers impacted on a combined utility basis. Using the top rankings of combined outages across KU and LG&E since 2003, the Hurricane Ike windstorm for KU (for which KU sought regulatory authority to defer those expenses) caused less damage when ranked by cost than the July 20, 2018 storm. The Hurricane Ike windstorm regulatory asset was approved in Case No. 2008-00457 (Order of December 22, 2008).

To date, LG&E has not requested authority to defer storm expenses for any storms causing less damage when ranked by cost than the July 20, 2018 storm.

<sup>4</sup> Case No. 2003-00433 included the storm damage O&M embedded in base rates for the January 26, 2009 event.

<sup>5</sup> Case No. 2008-00252 included the storm damage O&M embedded in base rates for the February 11, 2009 event.

- g. Below are the O&M amounts that were embedded in base rates at the time of the Derecho event.

<b>Test Period</b>	<b>Case Nos.</b>		<b>KU</b>	<b>LG&amp;E</b>	<b>Total</b>
	<b>KU</b>	<b>LG&amp;E</b>			
12 months ending 9-30-2003	2003-00434	2003-00433	\$1,311,392	\$2,583,017	\$3,894,409

**KENTUCKY EMERGENCY MANAGEMENT**

**Matthew G. Bevin**  
Governor

Boone National Guard Center  
100 Minuteman Parkway  
Frankfort, KY 40601-6168

**Michael E. Dossett**  
Director

August 17, 2018

Lonnie Bellar  
Chief Operating Officer  
LG&E - KU  
220 West Main Street  
Louisville, KY 40202

**SENT VIA ELECTONIC MAIL**

Dear Mr. Bellar,

I'm writing today to highlight the outstanding efforts of the LG&E – KU Storm Restoration Team during the severe weather outbreak of July 20<sup>th</sup> and the aftermath. This storm event brought tornados to Hart and Metcalfe counties, in addition to 4" diameter hail and 70 mph wind gusts in other areas. Most notably, the electric infrastructure in Woodford County sustained an unprecedented level of damage.

Throughout the storm and the following days, the LG&E – KU Restoration Team continued damage assessments and repair efforts in one of the top-five storm events to impact the system. We followed the efficient and timely restoration of over 170,000 customers throughout the Commonwealth with an all-hands and multi-state mutual aid effort.

I also take this opportunity to note the exceptional support the Division received from Steve Woodworth, Director of Electric System Restoration and Distribution Operations, and Brian Claypool, Emergency Management Outreach Coordinator. I received timely and critical updates from Steve throughout the storm event that were included in my brief to the Governor and the Executive Cabinet. Brian initially operated out of our State Emergency Operations Center and subsequently moved on site in the Woodford County EOC, continuing to push numerous daily updates to our staff throughout the event.

Our partnership with LG&E-KU spans the past decade and it gives us no greater pleasure than to thank the entire team for a job well done in support of the citizens and the communities of the Commonwealth.

Best regards,

A handwritten signature in blue ink, appearing to read "M. E. Dossett".

Michael E. Dossett, Director  
Kentucky Emergency Management

cc: John Wolfe, VP Electric Distribution  
Tom Jessee, VP Transmission  
Beth McFarland, VP Customer Services

**KENTUCKY UTILITIES COMPANY AND  
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**Response to Commission Staff's Second Request for Information  
Dated October 26, 2018**

**Case No. 2018-00304**

**Question No. 4**

**Responding Witness: Robert M. Conroy / Christopher M. Garrett**

- Q-4. Refer to the Response to Staff's First Request, Item 6.
- a. Provide the same information requested as to Item 6 for calendar years 2008-2013.
  - b. For each major storm identified in the information provided, state whether KU or LG&E sought authority to defer those expenses, the docket number of the case, and whether the Commission approved such request.
- A-4.
- a. See attached.
  - b. Listed below are the major storms identified in part a that KU and LG&E requested authority to establish a regulatory asset for accounting purposes.

<b>KU/LG&amp;E Storm Description</b>	<b>Case No.</b>	<b>Order Date</b>	<b>Authorized to Establish a Regulatory Asset</b>
Storm 09-14-08 (LGE) [Sep 2008 Hurricane Ike]	2008-00456	12-22-2008	Yes
Storm 09-14-08 (KU) [Sep 2008 Hurricane Ike]	2008-00457	12-22-2008	Yes
Storm 01-27-09 & Storm 02-11-09 (KU) [Jan 2009 Ice and Feb 2009 Wind Events]	2009-00174	09-30-2009	Yes
Storm 01-27-09 & Storm 02-11-09 (LGE) [Jan 2009 Ice and Feb 2009 Wind Events]	2009-00175	09-30-2009	Yes
LMS081311 (LGE) [Aug 2011 Thunderstorms]	2011-00380	12-27-2011	Yes

Total Company Storm Restoration O&M Expense, \$'s

LGE																	
2008			2009			2010			2011			2012			2013		
Description	Actual	Budget	Description	Actual	Budget	Description	Actual	Budget	Description	Actual	Budget	Description	Actual	Budget	Description	Actual	Budget
<b>Distribution Operations</b>																	
LGE Minor Storms	723,870			453,644			1,474,456			1,512,297			2,154,870			1,943,625	
<b>LGE Major Storms:</b>																	
Storm 04-02-06	571		Storm 12-22-07	31,866		Storm 01-27-09	11,597		LMS040911	233,581		LMS011712	627,308		LMS011712	1	
Storm 08-10-06	63,679		Storm 01-29-08	86		Storm 02-11-09	-		LMS042011	505,381		LMS030212	280,405		LMS030212	0	
Storm 07-04-07	25,316		Storm 02-05-08	40		Storm 06-18-09	(28,080)		LMS042211	867,101		LMS040911	0		LMS070112	1	
Storm 07-17-07	9,776		Storm 02-12-08	(8,860)		Storm 12-09-09	77,620		LMS052311	1,935,488		LMS042011	1		LMS071912	0	
Storm 07-19-07	(9,543)		Storm 02-21-08	16,715					LMS061911	861,310		LMS042211	4		LMS072712	1	
Storm 10-18-07	38,814		Storm 05-11-08	32,599					LMS071911	516,537		LMS052311	1		LMS122012	71,127	
Storm 12-22-07	2,041		Storm 06-19-08	22,341					LMS081311	8,434,720		LMS061911	1		OLM071013	2,365,767	
Storm 01-29-08	1,718,017		Storm 06-26-08	3								LMS070112	297,052		OLM083113	506,339	
Storm 02-05-08	894,564		Storm 07-08-08	(4,974)								LMS071911	33,175		OLM103113	545,778	
Storm 02-12-08	351,921		Storm 09-14-08	9,589								LMS071912	332,794				
Storm 02-17-08	81,461		Storm 01-27-09	43,798,747								LMS072712	343,708				
Storm 02-21-08	214,408		Storm 02-11-09	2,184,440								LMS081311	(1,230)				
Storm 05-11-08	171,619		Storm 06-18-09	1,008,741								LMS122012	296,273				
Storm 06-19-08	93,696		Storm 08-04-09	1,487,262													
Storm 06-26-08	374,577		Storm 12-09-09	176,762													
Storm 07-08-08	180,623		Storm 01-01-09	1,055													
Storm 09-14-08	25,072,593		Storm 01-21-09	6,720													
<b>Total LGE Major Storms:</b>	<b>29,284,133</b>			<b>48,763,132</b>			<b>61,137</b>			<b>13,354,117</b>			<b>2,209,491</b>			<b>3,489,013</b>	
<b>Total Distribution Operations</b>	<b>30,008,003</b>	<b>2,737,000</b>		<b>49,216,775</b>	<b>1,940,000</b>		<b>1,535,593</b>	<b>3,195,000</b>		<b>14,866,414</b>	<b>2,372,842</b>		<b>4,364,361</b>	<b>3,500,000</b>		<b>5,432,638</b>	<b>3,400,000</b>
<b>Transmission Operations</b>																	
LGE Minor Storms	5,101			10,361			30,665			55,878			48,652			41,154	
<b>LG&amp;E Major Storms</b>																	
Storm 09-14-08	4,415		Storm 01-27-09	111,637													
<b>Total Trans. Operations</b>	<b>9,516</b>			<b>121,998</b>			<b>30,665</b>			<b>55,878</b>			<b>48,652</b>			<b>41,154</b>	
<b>Total LGE Storms</b>	<b>30,017,518</b>	<b>2,737,000</b>		<b>49,338,773</b>	<b>1,940,000</b>		<b>1,566,258</b>	<b>3,195,000</b>		<b>14,922,292</b>	<b>2,372,842</b>		<b>4,413,013</b>	<b>3,500,000</b>		<b>5,473,792</b>	<b>3,400,000</b>

Total Company Storm Restoration O&M Expense, \$'s

			KU														
2008			2009			2010			2011			2012			2013		
Description	Actual	Budget	Description	Actual	Budget	Description	Actual	Budget	Description	Actual	Budget	Description	Actual	Budget	Description	Actual	Budget
<b>Distribution Operations</b>																	
KU Minor Storms	1,428,886			662,421			1,384,293			2,347,342			1,270,844			1,688,950	
<b>KU Major Storms:</b>																	
Storm 04-03-07	0		Storm 01-29-08	(246)		Storm 01-30-10	472		KMS040411	287,921		KMS021912	256,760		KMS102912	1	
Storm 08-16-07	24		Storm 02-11-08	(10)		Storm 06-21-10	205,902		KMS042011	49,906		KMS022912	155,759		OKM011713	131,972	
Storm 10-18-07	2,715		Storm 02-21-08	1,081		Storm 08-05-10	267,305		KMS042211	712,794		KMS030212	676,178		OKM062613	23,639	
Storm 01-29-08	339,078		Storm 09-14-08	7,096		Storm 01-27-09	25,968		KMS052511	54,266		KMS042211	3,152		OKM071813	20,831	
Storm 02-05-08	1,833,262		Storm 01-27-09	56,960,330		Storm 02-11-09	-		KMS062110	10,223		KMS062912	161,030		OKM083113	12,730	
Storm 02-11-08	1,358,433		Storm 06-20-09	57,549		Storm 04-11-09	27,775		KMS080510	1,064		KMS070112	387,797		OKM103113	366,682	
Storm 02-21-08	133,570		Storm 02-11-09	1,821,584		Storm 06-18-09	207		KMS081311	534,888		KMS070512	467,788		OKM111713	66,534	
Storm 03-04-08	139,623		Storm 04-11-09	3,900		Storm 06-22-09	582					KMS070812	149,969		OKU122113	99,404	
Storm 05-11-08	231,286		Storm 05-08-09	53,515		Storm 12-02-09	14,101					KMS071912	342,498				
Storm 06-03-08	188,858		Storm 06-16-09	256,026		Storm 12-09-09	463,037					KMS072712	220,618				
Storm 06-09-08	279,745		Storm 06-18-09	279,927		Storm 12-18-09	258,822					KMS102912	256,465				
Storm 09-14-08	3,220,173		Storm 06-22-09	77,604		Storm 12-08-09	(21,867)										
			Storm 06-25-09	134,396													
			Storm 07-25-09	88,284													
			Storm 08-04-09	417,305													
			Storm 12-02-09	81,441													
			Storm 12-09-09	288,455													
			Storm 12-18-09	9,874,095													
			Storm 12-08-09	34,173													
<b>Total KU Major Storms:</b>	<b>7,726,768</b>			<b>70,436,505</b>			<b>1,242,304</b>			<b>1,651,061</b>			<b>3,078,012</b>			<b>721,794</b>	
<b>Total Distribution Operations</b>	<b>9,155,653</b>	<b>2,298,000</b>		<b>71,098,926</b>	<b>1,760,000</b>		<b>2,626,598</b>	<b>3,299,000</b>		<b>3,998,403</b>	<b>2,226,850</b>		<b>4,348,856</b>	<b>3,400,000</b>		<b>2,410,744</b>	<b>3,100,000</b>
<b>Transmission Operations</b>																	
KU Minor Storms	55,850			23,606			161,669	30,000		324,000	30,750		501,093	30,754		344,374	30,750
<b>KU Major Storms</b>																	
Storm 09-14-08	69,019		Storm 01-27-09	1,041,480		Storm 12-18-09	10,700										
			Storm 02-11-09	8,723													
			Storm 12-18-09	195,125													
<b>Total Trans. Operations</b>	<b>124,869</b>			<b>1,268,935</b>			<b>172,369</b>	<b>30,000</b>		<b>324,000</b>	<b>30,750</b>		<b>501,093</b>	<b>30,754</b>		<b>344,374</b>	<b>30,750</b>
<b>Total KU Storms</b>	<b>9,280,522</b>	<b>2,298,000</b>		<b>72,367,861</b>	<b>1,760,000</b>		<b>2,798,967</b>	<b>3,329,000</b>		<b>4,322,403</b>	<b>2,257,600</b>		<b>4,849,950</b>	<b>3,430,754</b>		<b>2,755,118</b>	<b>3,130,750</b>

Note: Transmission has had limited tracking of major storms expense seperately from minor storm restoration work.

**KENTUCKY UTILITIES COMPANY AND  
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**Response to Commission Staff's Second Request for Information  
Dated October 26, 2018**

**Case No. 2018-00304**

**Question No. 5**

**Responding Witness: Christopher M. Garrett**

- Q-5. Refer to the Response to Commission Staff's First Request, Item 8(a).
- a. Explain why the second quarter of 2018 is a reasonable period to base the normal operations adjustment.
  - b. For the second quarter of 2018, provide a schedule comparing the O&M expense budgeted for storm damage and the actual amounts incurred, separated by utility.

- A-5.
- a. The second quarter of 2018 contained the most current three full months of normal operations for those resources utilized during the July 20<sup>th</sup> storm event. This is consistent with the approach in Case No. 2011-00380 concerning the August 2011 storm regulatory asset filing.

b.

<b>Q2 2018</b>	<b>Budget</b>	<b>Actual</b>
Distribution:		
LGE	\$ 1,046,531	\$ 2,462,176
KU	\$ 986,704	\$ 901,228
Transmission:		
LGE	\$ 33,990	\$ 16,991
KU	\$ 63,123	\$ 68,582
Total:	\$ 2,130,348	\$ 3,448,977



**KENTUCKY UTILITIES COMPANY AND  
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**Response to Commission Staff's Second Request for Information  
Dated October 26, 2018**

**Case No. 2018-00304**

**Question No. 6**

**Responding Witness: John K. Wolfe**

Q-6. Refer to the Response to Staff's First Request, Item 8(b). For each miscellaneous cost identified, provide a description and reason for incurring said cost.

A-6.

<b>Miscellaneous Expenses</b>	<b>Description / Reason</b>
Travel/Lodging Expenses	Provided sleeping arrangements for off-system personnel as well as resident resources reassigned to different work locations. It is a mutual assistance standard practice to provide lodging for off-system resources.
Meals	Provided meals to off-system and resident resources working 16+ hour shifts. Providing meals or identifying locations for meals ensures efficient utilization of resources.
Staging Site Costs	Staging sites were utilized to assist in handling the influx of off-system resources. Staging sites are established when operation facilities cannot house the large increase in off-system personnel and establishes a base camp closer to the more heavily damaged areas.
Fleet Maintenance	Provided fleet maintenance and repair to vehicles used in the restoration process. This is not normal scheduled maintenance, but maintenance to address vehicle issues during restoration.
Media Weather Crawls	Consists of media announcements regarding downed wires and what to do when encountered.
Call Center Overflow Service	Service utilized when inbound call capacity is reached. Customers are automatically directed to a 3 <sup>rd</sup> party site that takes the outage information and sends to LG&E and KU to process accordingly.
Tree/Debris Removal	Debris removal services that free up tree trimming personnel to work directly with line crews.