VERIFICATION

COMMONWEALTH OF KENTUCKY					
)				
COUNTY OF JEFFERSON)				

The undersigned, Christopher M. Garrett, being duly swom, deposes and says that he is Controller 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.

Christopher M. Garrett

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 1344 day of 1011 and 2018.

Notary Public

My Commission Expires:

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

VERIFICATION

COMMONWEALTH OF KENTUCKY					
	7				
COUNTY OF JEFFERSON	3				

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 8th day of November 2018.

Heldy Schooler

My Commission Expires:

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

KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

November 12, 2018 Supplemental Response to Attorney General's Initial Data Requests for Information Dated October 1, 2018

Case No. 2018-00304

Question No. 1

Responding Witness: Christopher M. Garrett / John K. Wolfe

- Q-1. Reference the Application at page 6, wherein the Companies describe the number of wires and poles damaged across the utilities' service territories.
 - a. Provide, with as much specificity and description as reasonably possible, the geographic areas, distribution lines, distribution areas, cities, etc. where the damage from the July 20, 2018 storms to the Companies' system were focused. If reasonably possible, provide specific line names, or, if parallel to roads, the name of those roads or streets and the zip code where those lines are located.
 - b. Based on the specificity or descriptions provided in response to 1(a), above, provide the costs, both O&M and capital, broken out by geographic area, distribution line, distribution area, city, etc. If reasonably possible, compare the costs related to the July 20, 2018 Storms per geographic area, distribution line, distribution area, city, etc. to the annual expense or average annual expense of those same areas for the past 10 years.
 - c. Provide an analysis of the extent of outages occurring as a result of the subject storm on the twenty (20) worst-performing circuits for each KU and LG&E.

A-1. **Original Response:**

- a. See attached. Attachment 1 for KU and Attachment 2 for LG&E contain a listing of distribution circuits which experienced one or more outages as a result of the July 20, 2018 severe weather, sorted by company, local area, and substation.
- b. See attached. The Companies do not maintain storm recovery costs to the level of detail described in the request. The attachment contains LG&E's and KU's annual O&M and Capital storm costs for 2008 2017.
- c. The July 20, 2018 severe weather outbreak produced 2,149 outage events on the LG&E and KU distribution systems. Only 6.5% (140) of these outage

events occurred on the twenty distribution circuits which contributed the most to system SAIFI for each Company over the previous five-year period. The following tables list these circuits and the number of outages resulting from the July 20^{th} severe weather event.

LG&E Circuits

LG&E CIrcuits	1	
		July 20th
		Storm Outage
Substation	Circuit	Events
DIXIE	DX1222	5
HARRODS CREEK	HK1234	4
MILL CREEK - LGE	MC1261	0
NACHAND	NA1266	0
DIXIE	DX1223	0
CENTERFIELD	CF1204	0
BRECKENRIDGE	BR1181	2
CLIFTON	CL1232	0
DEL PARK	DE1410	0
WATTERSON	WT1210	0
OXMOOR	OX1274	13
HARRODS CREEK	HK1243	0
INTERNATIONAL	IN1291	3
BRECKENRIDGE	BR1177	8
SEMINOLE	SM1235	0
SOUTH PARK	SP1116	0
SEMINOLE	SM1233	2
SOUTH PARK	SP1115	1
HIGHLAND	HI1105	0
TAYLOR	TA1130	13
	Total	51

KU (Kentucky) Circuits

KU (Kentucky) Circuits		July 20th Storm Outage
Substation	Circuit	Events
FRANKFORT	3411	0
Earlington - Oak Hill (Sec		
3B)	3418	0
REYNOLDS	0044	1
JOYLAND	0099	4
LANSDOWNE		
SWITCHING	0126	4
HOPEWELL	0286	5
SHANNON RUN	0868	11
PICADOME 12KV	0112	1
EVARTS	4476	0
CALLOWAY	0311	0
RICHMOND 2	2313	1
BRYANT ROAD	0874	3
HARLAN 12KV	4406	3
LOUDON AVENUE	0127	5
ROGERS GAP	0451	1
FARISTON	0217	1
VERSAILLES BYPASS	0509	21
PINEVILLE	0301	4
LANSDOWNE		
SWITCHING	0024	10
LANSDOWNE		
SWITCHING	0106	14
	Total	89

November 12, 2018 Supplemental Response for Question No. 1(b):

See attached. The Companies do not maintain storm recovery costs to the level of detail described in the request. The attachment contains corrections to LG&E's and KU's annual O&M and Capital storm costs for 2008 - 2017.

Historical Storm Costs

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Electric Distribution LG&E										
Capital O&M	9,458,355 30,008,003	10,590,745 49,216,775	681,541 1,535,593	3,680,005 14,866,414	1,210,459 4,364,361	1,099,026 5,432,638	2,706,998 9,069,912	2,234,328 4,844,214	1,317,667 2,304,503	1,174,483 2,267,174
KU										
Capital O&M	3,477,527 9,155,653	20,090,201 71,098,926	2,112,120 2,626,598	1,476,370 3,998,403	1,370,523 4,348,856	2,117,293 2,410,744	3,904,290 6,840,824	2,509,857 3,606,330	2,469,658 2,841,206	2,303,982 2,532,603
Transmission										
Capital O&M	437,145 9,516	715,221 121,998	95,738 30,665	335,943 55,878	347,245 48,652	6,744 41,154	98,919 295,181	71,716 143,350	95,288 83,641	153,409 99,240
KU										
Capital O&M	504,757 124,869	17,172,039 1,268,935	808,500 161,669	1,212,009 324,000	1,584,025 501,093	1,325,537 344,374	1,278,428 393,671	1,212,621 588,286	923,044 307,552	818,409 176,143
Total LG&E										
Capital O&M	9,895,500 30,017,518	11,305,966 49,338,773	777,279 1,566,258	4,015,948 14,922,292	1,557,704 4,413,013	1,105,770 5,473,792	2,805,917 9,365,093	2,306,043 4,987,564	1,412,955 2,388,144	1,327,892 2,366,414
KU Capital O&M	3,982,284 9,280,522	37,262,240 72,367,861	2,920,620 2,788,266	2,688,380 4,322,403	2,954,548 4,849,950	3,442,830 2,755,118	5,182,718 7,234,495	3,722,478 4,194,615	3,392,701 3,148,758	3,122,391 2,708,747