## **COMMONWEALTH OF KENTUCKY**

# **BEFORE THE PUBLIC SERVICE COMMISSION**

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In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ORDER APPROVING THE ESTABLISHMENT OF REGULATORY ASSET

CASE NO. 2019-00017

## RESPONSE OF LOUISVILLE GAS AND ELECTRIC COMPANY TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION DATED FEBRUARY 27, 2019

FILED: March 7, 2019

#### VERIFICATION

## COMMONWEALTH OF KENTUCKY ) ) COUNTY OF JEFFERSON )

The undersigned, **Christopher M. Garrett**, being duly sworn, 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.

Subscribed and sworn to before me, a Notary Public in and before said County

and State, this the day of March 2019.

Public Public

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

#### VERIFICATION

# COMMONWEALTH OF KENTUCKY ) ) COUNTY OF JEFFERSON )

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 4th day of March 2019.

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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 Commission Staff's Second Request for Information Dated February 27, 2019

# Case No. 2019-00017

## Question No. 1

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

- Q-1. Refer to LG&E's response to Commission Staff's First Request for Information (Staff's First Request), Item 1.c. Confirm that Kentucky Utilities Company (KU) employees did not participate in the restoration process. If this cannot be confirmed, explain why KU is not listed in the response.
- A-1. KU employees and contractors assisted with restoring LG&E and KU customers impacted by the November 2018 Ice Storm. Early in the Company's outage response, a large percentage of KU's on-system contractors were released to assist LG&E's restoration efforts when the Company determined that some KU operating centers were not being impacted as severely as LG&E and KU - Elizabethtown. As the slow moving weather system moved through these KU service areas, and associated outages were restored, the Company redistributed available KU personnel to harder hit KU operating locations and Louisville (LG&E).

By the end of the service restoration effort, seventy-five (75) KU line technicians had provided assistance to LG&E. These KU employees were inadvertently left off of the Company's response to Commission Staff's First Request for Information, Item 1.c, because they were included internally on KU's restoration resource counts. Inclusion of KU line technician counts increases LG&E's total resource count to 1,460 versus 1,385.

## LOUISVILLE GAS AND ELECTRIC COMPANY

## Response to Commission Staff's Second Request for Information Dated February 27, 2019

## Case No. 2019-00017

## **Question No. 2**

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

- Q-2. Refer to LG&E's response to Staff's First Request, Item 4.a and the application, Exhibit 1. Provide a detailed description of how miscellaneous costs were determined and calculated for "Estimate Amount Considered Normal Operations."
- A-2. The miscellaneous costs are the actual meal expense for a Transmission company employee and were included in normal operations in error.