

KyPSC Case No. 2019-00271
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DATA REQUEST

WITNESS

TAB NO.

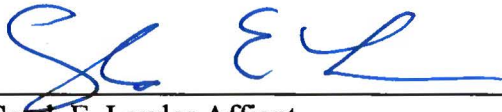
STAFF-DR-01-014 4th SUPP

Sarah E. Lawler.....14

VERIFICATION

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Sarah E. Lawler, Director Rates & Regulatory Planning, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing supplemental data requests and that the answers contained therein are true and correct to the best of her knowledge, information and belief.



Sarah E. Lawler Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this 27th day of January, 2020.



NOTARY PUBLIC

My Commission Expires: July 8, 2022



E. MINNA ROLFES-ADKINS
Notary Public, State of Ohio
My Commission Expires
July 8, 2022

FOURTH SUPPLEMENTAL STAFF-DR-01-014

REQUEST:

Provide the following information concerning the costs for the preparation of this case:

- a. A detailed schedule of expenses incurred to date for the following categories:
 - 1) Accounting;
 - 2) Engineering;
 - 3) Legal;
 - 4) Consultants; and
 - 5) Other Expenses (Identify separately).
- b. For each category identified in part (a) above, the schedule should include the date of each transaction, check number or other document reference, the vendor, the hours worked, the rates per hour, amount, a description of the services performed, and the account number in which the expenditure was recorded. Provide copies of contracts or other documentation that support charges incurred in the preparation of this case. Identify any costs incurred for this case that occurred during the base period.
- c. An itemized estimate of the total cost to be incurred for this case. Expenses should be broken down into the same categories as identified in (a) above, with an estimate of the hours to be worked and the rates per hour. Include a detailed explanation of

how the estimate was determined, along with all supporting workpapers and calculations.

- d. Provide monthly updates of the actual costs incurred in conjunction with this rate case, reported in the manner requested in parts (a) and (b) above, and a cumulative total of cost incurred to date for each category. Updates will be due when the utility files its monthly financial statements with the Commission, through the month of public hearing.

RESPONSE:

- a. Please see STAFF-DR-01-014 4th Supplemental Attachment 1 (Section A: Expenses incurred to date) for a detailed schedule of actual expenses incurred to date in the categories prescribed in the data request.
- b. Objection to the extent this request includes information that is protected under the doctrine of attorney client privilege. Without waiving said objection, please see STAFF-DR-01-014 4th Supplemental Attachment 1 (Section A: Expenses incurred to date) for the requested details of actual rate case expenses incurred to date. STAFF-DR-01-014 4th Supplemental Attachment 2 - Invoices contains supporting invoice documentation for non-privileged expenses incurred to date. There have been no new supporting contracts and letters of arrangement since the original data request response. Actual costs are shown by month and those costs incurred through November have occurred during the base period.
- c. STAFF-DR-01-014 4th Supplemental Attachment 1 also includes estimated remaining costs to be incurred (Section B: Itemized estimates of total costs to be incurred) with a total estimated cost to be incurred for this case. Estimates for the

depreciation study, demolition study and rate of return were based on information received from the expert witnesses. The other expenses were estimated by reviewing the actual expenses incurred in the Company's most recent two rate cases filed with this Commission and applying professional judgement and knowledge of the issues involved in this case. A comparison of the current case estimate with the actual and estimated expenses of the prior two cases is included in the filing on Schedule F-6.

- d. Monthly updates of actual costs incurred in conjunction with this rate case will be included along with the monthly financial statements filed with the Commission through the month of the public hearing.

PERSON RESPONSIBLE: Sarah E. Lawler

Document/ Journal Entry No.	Invoice Date	Payment Date	Vendor Name / Description	Hours Worked	Rate Per Hour	Consultants							Total			
						Accounting	Engineering	Legal	Depreciation Study	Rate of Return	Demolition Study	Publish Legal Notices		Transport/ Lodging/Meals	Misc.	
A) EXPENSES INCURRED TO DATE																
Total Actual Costs to Date						0.00	0.00	32,282.01	37,135.22	31,000.00	0.00	76,397.81	0.00	0.00	0.00	176,815.04
December 2019																
APACR92098	8-Nov-19	23-Dec-19	Gannett Fleming Valuation and Rate Consultants, LLC Consulting Work	4.00	275.00				1,100.00						1,100.00	
APACR92098	8-Nov-19	23-Dec-19	Gannett Fleming Valuation and Rate Consultants, LLC Consulting Work	10.00	\$175.00				1,750.00						1,750.00	
APACR92098	8-Nov-19	23-Dec-19	Gannett Fleming Valuation and Rate Consultants, LLC Consulting Work	1.50	\$115.00				172.50						172.50	
APACR85738	3-Dec-19	5-Dec-19	Goss Samford Professional Legal Services	26.40	\$245.00			6,144.69							6,144.69	
APACR85738	3-Dec-19	5-Dec-19	Goss Samford Professional Legal Services	29.70	\$175.00			4,937.53							4,937.53	
Total December 2019						0.00	0.00	11,082.22	3,022.50	0.00	0.00	0.00	0.00	0.00	14,104.72	
Total Actual Costs to Date						0.00	0.00	43,364.23	40,157.72	31,000.00	0.00	76,397.81	0.00	0.00	190,919.76	
B) ITEMIZED ESTIMATE OF TOTAL COSTS TO BE INCURRED																
			Professional Legal Services	1,111.00	210.00			233,310.77							233,310.77	
			Depreciation Study Consulting Work	116.72	170.00			19,842.28							19,842.28	
			Non Hour Based Costs	N/A	N/A				39,000.00	0.00	133,602.19	50,000.00	10,000.00		232,602.19	
Total Estimate Costs to be Incurred						0.00	0.00	233,310.77	19,842.28	39,000.00	0.00	133,602.19	50,000.00	10,000.00	485,755.24	
TOTAL PROJECTED EXPENSES ASSOCIATED WITH THE RATE CASE						0.00	0.00	276,675.00	60,000.00	70,000.00	0.00	210,000.00	50,000.00	10,000.00	676,675.00	



Excellence Delivered As Promised

INVOICE

Gannett Fleming Valuation and Rate Consultants, LLC

Duke Energy Kentucky LLC
Attn: [REDACTED], Manager, Asset Accounting
550 South Tryon, DEC 42A
Charlotte, NC 28202

Project: 065108
Invoice No: 065108*4854
Invoice Date: November 8, 2019

ACH/EFT Payment Information:
ABA: [REDACTED]
Account No.: [REDACTED]
Account Name: Gannett Fleming

Check Payment Information:
Gannett Fleming Valuation and Rate Consultants,
LLC
PO Box 829160
Philadelphia, PA 19182-9160

Federal EIN: [REDACTED]
Send Remit Info: AccountsReceivable@gfnet.com

Note: TO PREVENT IMPOSTER FRAUD, if you receive any notification of a change in payment instructions, you should call our Accounts Receivable department at 717-763-7211 to verify the authenticity of the change. We cannot be held responsible for a misdirected payment as a result of your not confirming authenticity of requested changes to payment instructions or "imposter notices" to your system.

Invoice Period: September 28, 2019 through October 25, 2019

Project Manager: John J. Spanos [REDACTED]@gfnet.com 717 763 [REDACTED]

Depreciation Study - Electric

Summary of Current Charges

Phase 000	- DEPRECIATION STUDY - ELECTRIC	\$ 3,022.50
	Total Charges	<u>\$ 3,022.50</u>
	Total Due This Invoice	\$3,022.50



Excellence Delivered *As Promised*

Project: 065108
Invoice No: 065108*4854
Invoice Date: November 8, 2019

Gannett Fleming Valuation and Rate Consultants, LLC

Phase 000 -- Depreciation Study - Electric

Labor Costs			
<u>Labor Classification</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Analyst	10.00	\$ 175.00	\$ 1,750.00
John J. Spanos	4.00	275.00	1,100.00
Support Staff	1.50	115.00	172.50
			<hr/>
	Total Labor Costs		\$ 3,022.50
	Total Phase -- 000		<hr/> \$ 3,022.50