

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN ORDER) CASE NO. 2020-00109
AUTHORIZING THE ISSUANCE OF INDEBTEDNESS)

ATTORNEY GENERAL’S FIRST SET OF DATA REQUESTS

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these First Data Requests to Kentucky Utilities Company (“Company”) to be answered by the date specified in the Commission’s Orders of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel with an electronic version of these questions, upon request.
- (4) 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.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

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

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

(9) If the Company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all

letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and

all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

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

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

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.

ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ORDER
AUTHORIZING THE ISSUANCE OF INDEBTEDNESS

Case No. 2020-00109

Attorney General's First Data Requests

1. The Company's Application states, "[t]he First Mortgage Bonds and the Intermediate Term Financings are proposed in substitute of each other or in combination, so that the aggregate principal amount outstanding of the requested financing options at any one time will not exceed \$750,000,000. KU will continue pursuing the most prudent and reasonable least cost financing option, or combination thereof, available at the time of the Company's decision under the current circumstances." See Application at numerical paragraph 13.
 - a. Describe the process for issuing First Mortgage Bonds with a focus on whether the circumstances that may play out on or before November 1, 2020 will make the issuance of First Mortgage Bonds a feasible option. In this description, please provide a schedule or timeline for known blackout dates and other factors implicating the likelihood of the ability to issue First Mortgage Bonds.
2. Provide a comparison of the interest rates that the Company would expect to pay related to the issuance of First Mortgage Bonds in comparison to the alternative financing options related to the replacement of the Series B Bonds. In this analysis, please compute the total value of the differences in these interest rates.
3. To the extent the Company is required to enter into a financing option that does not include First Mortgage Bonds, describe whether the Company would seek to replace that financing with First Mortgage Bonds when practicable. Describe whether the terms of the alternative options would preclude or disadvantage replacement for some period.
4. Describe all communication of which the Company is aware which have occurred since the filing of the application and which impacts the ability of the Company to pursue First Mortgage Bond issuance, including but not limited to access to courthouses, etc.
5. The Company issued the Series B Bonds which mature on November 1, 2020 pursuant to authority described in Case No. 2019-00242 and sought and granted in Case No. 2010-00206. Please clarify to which of the Company's expenses and obligations the funds received from the Series B Bond Issuance relate.
6. Describe the ratio of Company's debts in relation to its assets.

DANIEL J. CAMERON
ATTORNEY GENERAL



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Certificate of Service and Filing

Pursuant to the Commission's Order dated March 17, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the following:

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A handwritten signature in blue ink, appearing to read "J. Michael" with a stylized flourish at the end.

Assistant Attorney General