

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

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>KENTUCKY UTILITIES COMPANY FOR AN</b>	)	<b>CASE NO. 2020-00349</b>
<b>ADJUSTMENT OF ITS ELECTRIC RATES, A</b>	)	
<b>CERTIFICATE OF PUBLIC CONVENIENCE</b>	)	
<b>AND NECESSITY TO DEPLOY ADVANCED</b>	)	
<b>METERING INFRASTRUCTURE,</b>	)	
<b>APPROVAL OF CERTAIN REGULATORY</b>	)	
<b>AND ACCOUNTING TREATMENTS, AND</b>	)	
<b>ESTABLISHMENT OF A ONE-YEAR</b>	)	
<b>SURCREDIT</b>	)	

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>LOUISVILLE GAS AND ELECTRIC</b>	)	<b>CASE NO. 2020-00350</b>
<b>COMPANY FOR AN ADJUSTMENT OF ITS</b>	)	
<b>ELECTRIC AND GAS RATES, A</b>	)	
<b>CERTIFICATE OF PUBLIC CONVENIENCE</b>	)	
<b>AND NECESSITY TO DEPLOY ADVANCED</b>	)	
<b>METERING INFRASTRUCTURE,</b>	)	
<b>APPROVAL OF CERTAIN REGULATORY</b>	)	
<b>AND ACCOUNTING TREATMENTS, AND</b>	)	
<b>ESTABLISHMENT OF A ONE-YEAR</b>	)	
<b>SURCREDIT</b>	)	

**JOINT DATA REQUESTS OF**  
**KENTUCKY UTILITIES COMPANY AND**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**PROPOUNDED TO LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT**  
**AND LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to Lexington-Fayette Urban County Government and Louisville/Jefferson County Metro Government (“LFUCG-Lou Metro”) to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 9, 2020.

## **Instructions**

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, LFUCG-Lou Metro, its witnesses, or its counsel.

2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if LFUCG-Lou Metro receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If LFUCG-Lou Metro object to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground 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.

8. In the event any document requested has been destroyed or transferred beyond the control of LFUCG-Lou Metro, its counsel, or its witnesses, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

## Data Requests

### Richard Bunch

1. Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all workpapers supporting your testimony, analyses, and conclusions.
2. Provide pdf copies of the testimonies submitted by Richard J. Bunch in the following regulatory proceedings identified in Exhibit Bunch-1 to his direct testimony in this proceeding:
  - a. MPSC Case U-20697 (Consumers Energy electric rate case)
  - b. MPSC Case U-20561 (DTE Electric general rate case)
3. Please refer to page 26 the Direct Testimony of Richard J. Bunch. Please identify all electric utilities that have established FERC 373 sub-accounts for each luminaire types (light source as well as fixture style).
4. Please refer to page 26 the Direct Testimony of Richard J. Bunch. Please identify all electric utilities that have been ordered by a regulatory commission to establish FERC 373 sub-accounts for each luminaire types (light source as well as fixture style). Provide the name of the utility, the jurisdiction, case number, and order date. Also, provide a pdf copy of each order.
5. Please refer to page 30, line 18 of Mr. Bunch's direct testimony. Mr. Bunch states that "The [Companies' outage and restoration] figures compare well to peer utilities." Please identify the "peer utilities" referenced by Mr. Bunch and provide the following for each such peer utility:
  - a. Outage and restoration data;
  - b. Number of lights installed;
  - c. The population of the largest city served; and
  - d. Any important differences in lighting maintenance practices compared to the Companies and the other peer utilities.
6. Refer to Exhibit Bunch-2. Please provide the cost-of-service study or other workpapers used to calculate the Adjusted ROR for each rate class shown in column k of the spreadsheet.
7. Refer to Exhibit Bunch-2. Please perform the same analysis using the 6-CP and 12-CP cost of service studies provided by KU and LG&E. Provide all workpapers showing the calculation of the Adjusted ROR for each rate class.

8. On page 30, lines 18 – 19, and page 31, lines 1 – 2 of Mr. Bunch’s testimony, he argues that DTE should be considered one of KU’s “peer utilities.” Please describe the operating similarities between KU and DTE that make them “peer utilities.” Please include in your answer a discussion of climate, density, age of systems, vandalism rates, tampering rates, etc.
9. Please provide all source documents supporting Mr. Bunch’s assertions in testimony regarding DTE, including but not limited to streetlight fleet size, number of HID and LED luminaries, respectively, lighting type, re-lamping data, streetlight outage durations, restoration times, and patrol-and-fix reporting data and practices.

Dated: March 19, 2021

Respectfully submitted,




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and Louisville Gas and Electric Company*

**CERTIFICATE OF COMPLIANCE**

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Kentucky Utilities Company's and Louisville Gas and Electric Company's March 19, 2021 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 19, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a true and correct copy in paper medium will be delivered to the Commission within 30 days of the lifting of the State of Emergency.



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*Kenneth R. Riggs*  
*Counsel for Kentucky Utilities Company*  
*and Louisville Gas and Electric Company*