

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

ELECTRONIC APPLICATION OF KENTUCKY )  
UTILITIES CO. FOR AN ADJUSTMENT OF ITS )  
ELECTRIC RATES, A CERTIFICATE OF PUBLIC ) CASE No.  
CONVENIENCE AND NECESSITY TO DEPLOY ) 2020-00349  
ADVANCED METERING INFRASTRUCTURE, )  
APPROVAL OF CERTAIN REGULATORY AND )  
ACCOUNTING TREATMENTS, AND ESTABLISH- )  
MENT OF A ONE-YEAR SURCREDIT )

-and-

ELECTRONIC APPLICATION OF LOUISVILLE )  
GAS & ELECTRIC CO. FOR AN ADJUSTMENT )  
OF ITS ELECTRIC AND GAS RATES, A CERTIFI- )  
CATE OF PUBLIC CONVENIENCE AND NECESSITY ) CASE No.  
TO DEPLOY ADVANCED METERING INFRA- ) 2020-00350  
STRUCTURE, APPROVAL OF CERTAIN )  
REGULATORY AND ACCOUNTING TREATMENTS, )  
AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT )

**ATTORNEY GENERAL'S RESPONSES TO DATA REQUESTS  
OF LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT AND  
LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky,  
by and through his Office of Rate Intervention, and submits the following response to the data  
request of Lexington-Fayette Urban County Government and Louisville/Jefferson County  
Metro Government in the above-styled matters.

Respectfully submitted,

DANIEL CAMERON  
ATTORNEY GENERAL



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***Certificate of Service and Filing***

Pursuant to the Commission's Orders 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 parties of record. Further, counsel for OAG will submit the paper originals of the foregoing to the Commission within 30 days after the Governor lifts the current state of emergency. Counsel further certifies that the responses set forth herein are true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry.

This 1<sup>st</sup> day of April, 2021



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Assistant Attorney General

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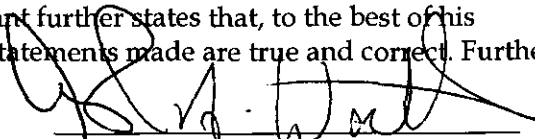
-and-

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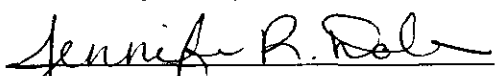
**AFFIDAVIT OF GLENN WATKINS**

Commonwealth of Virginia )  
)  
)

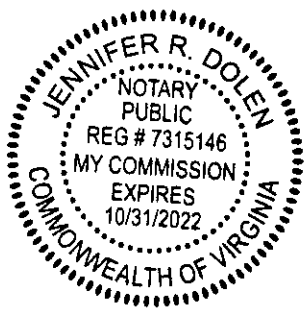
Glenn Watkins, being first duly sworn, states the following:  
The Data Request Responses are those of the Affiant in the above-styled cases. Affiant states that he would give the answers set forth in the Data Request Responses if asked the questions propounded therein. Affiant further states that, to the best of his knowledge, information and belief his statements made are true and correct. Further affiant sayeth not.

  
\_\_\_\_\_  
Glenn Watkins

SUBSCRIBED AND SWORN to before me this 18<sup>th</sup> day of March, 2021

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: 10/31/2022



WITNESS / RESPONDENT RESPONSIBLE:  
GLENN WATKINS

QUESTION No. 1  
Page 1 of

On behalf of the Attorney General in the LG&E case, Glenn Watkins offers two recommendations: an increase in revenue for LG&E's LS/RLS tariff of \$2,854,000 (Option 1) or \$2,140,000 (Option 2) (Table 30, p.72). In the KU case, Watkins proposes an increase in revenue for KU's LS/RLS tariff of \$3,489,000 (Option 1) or \$2,617,000 (Option 2) (p.68, table 27). Please state which one of these alternatives represents the Attorney General's recommendation in each case.

RESPONSE:

As discussed on pages 65 through 67 of his direct testimony, Mr. Watkins is offering two options for the Commission's consideration. Option 1 is similar to Mr. Seelye's proposed class revenue increases wherein he assigned approximate equal percentage increases to all classes except Rate LS/RLS. My Option 1 is distinguished from Mr. Seelye's proposed class revenue allocations in that under Option 1, the LS/RLS class also receives an equal percentage increase.

As indicated on pages 67 and 71, my second option considers gradualism and gives more recognition towards movement to cost of service. Mr. Watkins does not indicate a preference for Option 1 or Option 2.