

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

In the Matter of:

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

**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT’S AND
LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT’S
REQUEST FOR INFORMATION
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

In accordance with the Public Service Commission’s (“Commission”) December 9, 2020, Order, Intervenor Lexington-Fayette Urban County Government (“LFUCG”) and Louisville/Jefferson County Metro Government (“Metro”) propound the following data requests upon the Kentucky Industrial Utility Customers, Inc. (“KIUC”). KIUC shall respond to these requests in accordance with the provisions of the Commission’s December 9, 2020, Order,

applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate LFUCG's and Metro's requests and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for LFUCG and Metro.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.
6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.
7. If KIUC objects to any request on any grounds, please notify counsel for LFUCG and Metro as soon as possible.
8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

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

10. 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.

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the March 19, 2021, electronic filing of this document is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be 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 an original paper medium of the Petition for Confidential Treatment will be delivered to the Commission within 30 days after the lifting of the State of Emergency.



Counsel for LFUCG and Metro

Request for Information

1. On page 32 of his testimony, Stephen Baron states: “While cost-of-service is an important factor, it is not the only factor. First, there can be legitimate disagreements on the appropriate methodology that should be used to allocate costs to rate classes. Moreover, such factors as gradualism, state economic development goals, the impact on competitiveness of industry, and other policy factors should also be considered by the Commission.”
 - a. Please cite and explain any disagreements about allocation methodology that justify any rate class paying 2x-3x the average rate of return, as the Lighting class now does.
 - b. Please explain how gradualism might justify raising rates even further above your calculated cost of service, as Baron proposes for LG&E’s LS/RLS tariff
 - c. Would you agree that the provision of public goods, such as modern, well maintained infrastructure, plays a role in regional economic competitiveness and state economic goals?
 - d. Would you regard public safety, including roadway safety, pedestrian safety and crime prevention benefits provided by street lighting, as a “purpose” for which utility service is used that the Commission may consider when setting rates and classifications of service?
 - e. Should the Commission prioritize industrial competitiveness over public safety when setting rates and classifications?