

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 DEPARTMENT OF DEFENSE
AND ALL OTHER FEDERAL EXECUTIVE AGENCIES**

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 Department of Defense and all other Federal Executive Agencies (“DOD”). DOD 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 request 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 DOD 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,



STURGILL, TURNER, BARKER & MOLONEY, PLLC
James W. Gardner
M. Todd Osterloh
333 W. Vine Street, Suite 1500
Lexington, Kentucky 40507
Telephone No.: (859) 255-8581
Facsimile No.: (859) 231-0851
jgardner@sturgillturner.com
tosterloh@sturgillturner.com

and

Susan Speckert, Commissioner of Law
David J. Barberie, Managing Attorney
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500
sspeckert@lexingtonky.gov
dbarberi@lexingtonky.gov

*Attorneys for Lexington-Fayette Urban County
Government*

and

MICHAEL J. O'CONNELL
JEFFERSON COUNTY ATTORNEY
Jeff Derouen
Lauren Givhan
Assistant County Attorneys
First Trust Centre
200 S. 5th St. Suite 200N
Louisville, KY 40202
Phone: (502) 574-6331
Jeff.Derouen@louisvilleky.gov
Lauren.Givhan@louisvilleky.gov

Attorneys for Louisville Metro

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

Requests for Information

1. On page 30 of his testimony, Michael Gorman states: “When the rates are designed so that the demand costs, energy costs, and customer costs are properly reflected in the demand, energy, and customer components of the rate schedules, respectively, customers are provided with the proper economic incentives to manage their loads and consumption efficiently and economically. In turn, the shift in customer loads based on these efficient prices signals to the utility the need for new investment, and/or opportunities to avoid inefficient or avoidable costs.” Please apply this reasoning to street lighting services. Recognizing that customers generally do not own or manage streetlights, what role do rates play in efforts to manage load and consumption efficiently and economically?

2. On page 46 of his testimony, regarding your proposed allocation of the revenue increases for KU and LG&E, Michael Gorman states that “Spreading the increase between 0% and 125% of the system average increase ensures that all classes are moved toward cost of service” On page 44 (Table 14) of his testimony, Gorman shows that LG&E’s LS/RLS rate currently pays 14.6% above cost of service. On page 45 (Table 15) of his testimony, Gorman shows that KU’s LS/RLS rate currently pays 25.2% above cost of service. However, on page 47 (Table 16), Gorman proposes an 8.6% increase to LG&E’s LS/RLS rate, and on page 48 (Table 17), you propose a 4.0% increase to KU’s LS/RLS rate. Please explain how Gorman’s proposal to increase the LS/RLS rates moves them toward the cost of service.