

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	CASE NO.
LOUISVILLE GAS AND ELECTRIC	)	
COMPANY FOR AN ADJUSTMENT OF ITS	)	2025-00114
ELECTRIC AND GAS RATES AND	)	
APPROVAL OF CERTAIN REGULATORY	)	
AND ACCOUNTING TREATMENTS	)	

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**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT’S  
FIRST REQUEST FOR INFORMATION TO KENTUCKY UTILITIES**

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In accordance with the Public Service Commission’s (“Commission”) June 18, 2025, Order, Intervenor Louisville/Jefferson County Metro Government (“Louisville Metro”) propounds the following data requests upon the Applicant Louisville Gas and Electric Company (“LG&E”). LG&E shall respond to these requests in accordance with the provisions of the Commission’s June 18, 2025, 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 Louisville 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 Louisville 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 LG&E objects to any request on any grounds, please notify counsel for Louisville 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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**LOUISVILLE METRO'S INITIAL REQUESTS FOR INFORMATION  
TO LOUISVILLE GAS AND ELECTRIC COMPANY**

1. Refer to the testimony of Timothy S. Lyons at page 27. Please explain why the Companies' proposed base rates for the Rate LS class that were updated to reflect the alleged current cost of service while the proposed base rates for the Rate RLS class were updated to reflect a uniform increase in class revenues.
2. Refer to the testimony of Timothy S. Lyons. Please describe the way that load profiles were constructed for each of the KU and LG&E lighting rate schedules.
3. Please explain why the rate for each lighting offering in Rate LS is not proposed to be increased by the same percentage.
4. Refer to TSL-13. Please explain how the Companies determined the kW per light.
5. Refer to TSL-13. Please explain how the Companies determined the useful life.
6. Refer to the testimony of John J Spanos, VII-232. There is a substantial deviation between the fitted (smooth) and original survivor curve for street lighting and signal systems, corresponding to a clear change in age-specific failure rate at about 45 years. Does witness Spanos or the Company have any explanation for the sharp decline in failure rates at older ages?
7. Refer to TSL-13. Please explain how the Companies determined the Total Installed Cost.
8. Refer to TSL-13. Please explain how the Companies determined the Annual Non-Fixture Maintenance Cost.
9. Does KU, LG&E, or its corporate affiliates receive any form of rebates or reimbursement from LED manufactures, distributors, or retailers? If so, how and where is that revenue booked?
10. Does the Company track expenses for new installation separate from repairs and the type of repair be known (e.g. problem related to wiring, fixture, pole, etc.)? Why or why not?
11. For the period after July 2020 to the present, please provide any Company internal and external business plans, presentations, marketing material, feasibility studies, lighting conversion financial analyses, customer economic studies, conversion financial models, and correspondence to senior leadership as created or prepared by or for the Company as it relates to street lighting. Bookmark the following documents in your response:

- a. Technical specifications or metrics established by the Company that were used to select LED lighting types, such as lumen output, lumens-per-watt, warranty, L70, kelvin, etc.
  - b. Product data sheets for the new LED lighting offerings and LED equipment supply options.
12. Identify the useful life for each type of fixture within the proposed Restricted Lighting Service tariff.
13. LED fixtures service lives typically range from 50,000 to 100,000, and may extend as high as 250,000 hours or 12.5, 25, or 62 years respectively. As such these extended life spans, should lead to projections of lower annual O&M costs as a component of rate construction. Yet the projected LED LS rates remain at, near, or even higher than the RLS they are replacing.
- a. Is there a projected timeframe or LED saturation level where the Company expects these O&M levels to begin to go down to reflect the reduced O&M costs of LED fixtures?
  - b. If the Company does not believe increased deployment of LED fixtures will reduce the O&M costs for leased lighting please elaborate why?
  - c. Additionally, public entities have seen a drastic reduction in the cost of outdoor area lighting in the past several years, while efficiency continues to increase. Again, the current LED LS rate constructions appear not to reflect this significant downward trend in fixture costs. Please explain the Company's experience in LED fixture costs over the past several years?
14. What is the percentage of street lights throughout the Company's system that is an LED light?
15. Does the Company have any systematic plans to convert restricted lighting to LED, such as geography or rate code?
16. In a prior rate case, the Company defined the end of service life for an LED fixture when the fixture fails completely or lumen output is reduced below 70% (L70) of initial output rating.

- a. Does the Company still use the same definition for end of service life for an LED fixture?
  - b. What are the Company's plans for service/maintenance for LED lights when they near or reach the end of service?
  - c. When sourcing or purchasing LED fixtures, does the Company have a minimum allowable/acceptable L70 rating for fixtures in hours? If so, what is that rating?
  - d. Please provide the L70 rating for each LS LED fixture/rate code currently in use.
17. Please refer to the Rate LS and RLS. Please provide an updated cross-reference table (excel) that associates all existing RLS rate codes with their LS LED equivalent(s). Please ensure the cross-reference table includes the RLS and LS cost, and if applicable for LS rates the pole category and charges.
  18. For each street lighting type within Rates LS and RLS, please identify the number of accounts on each type as of June 30 on each year since 2020 for the Company.
  19. Please identify the number of each type of lighting in Rate RLS each Company anticipates replacing for each year over the next 5 years for the Company.
  20. For each type of street-lighting pole, please identify the number of accounts on each type as of June 30 on each year since 2020 for the Company.
  21. Please provide a breakdown for the following:
    - a. For each individual rate code in LS and RLS (i.e. LC2, LC4, 490, 470), how many fixtures and poles does Louisville Metro pay as of June 30, 2025, and in the base year?
    - b. Based off of those numbers, what would the projected annual cost per rate codes of LS and RLS be for Louisville Metro under the current tariffs? What would the annual cost be for Louisville Metro under the proposed tariffs in this rate filing?
  22. Please state how many new public street lights were installed by LG&E for each of the past three years, indicating the types of lights installed and the number of these lights which replaced previously existing street lights, for the following: Louisville/Jefferson County Metro Government and LG&E's entire system.

23. For each of the past three years, please provide the number of street lights that LG&E had planned on replacing prior to that year, and a summary of the actual number replaced that year for the following: Louisville/Jefferson County Metro Government (extrapolate if needed) and LG&E's entire system.
24. Please explain how the Companies determined the One-Time Conversion Fee and the Monthly Conversion Fee if Customer requests to change current functioning non-LED fixture to an LED fixture.
25. Please explain in detail LG&E's current policies, procedures, practices, and/or guidelines for maintaining street lights in Jefferson County and provide copies of the same.
  - a. Does LG&E regularly inspect individual street lights or the collective street lighting in Jefferson County?
  - b. Do these inspections take place only upon the receipt by LG&E of a complaint regarding a particular street light?
  - c. What is the average response time to replace a non-working street light in Jefferson County?
  - d. Does this information differ depending upon the type of street light? If so, please provide a detailed explanation.
  - e. Would AMI deployment as proposed in the Company's application provide information to the Company that would improve any of the response times or costs related to lighting?
26. Please describe in detail all maintenance that must be performed by the Company on each type of street light to ensure that it operates properly and provide a list of each component of the required maintenance and its monthly cost.
27. Please provide both the number and type of public street lights for Louisville Metro accounts for which service or maintenance was performed in each of the last three years and the same information for both LG&E's entire system. In addition, please provide the basis for generating the above repair or maintenance order (i.e., referral from 311, customer complaint, LG&E) for each of the above.

28. Please provide the average time to repair a malfunctioning street light from the time of discovery, either by public reporting or Company representative, initiation of work order; to the time the light is restored to operation, work order is closed.
29. Please provide a chart of maintenance and repair calls for each street light for Louisville Metro and the total cost for each call, including both materials and labor.
30. Please provide separately the number of calls from the public regarding street lights paid for by Louisville Metro and the rest of the Company's system.
31. Please provide any internal policies or procedures with regards to street light maintenance, repair and replacement.
32. Is LG&E able to ascertain, at any given time, the number of street lights paid for by Louisville Metro that are actually in proper working order? If so, please provide a detailed explanation, and further explain:
  - a. How many street lights (on average) are actually in proper working order at any given time;
  - b. Whether Louisville Metro is charged the monthly tariff rate for non-working street lights for the periods of time within which such street lights are non-operational or not working properly;
  - c. The amount of time it takes (on average) to bring such street lights into working order; and
  - d. Whether this information differs among different types of street lights. If so, please provide this information for each type of light.
33. Please state how many existing street lights are scheduled (or anticipated) to be replaced by the Company over the next five years for which Louisville Metro currently and/or in the future will pay a monthly rate. Please provide the quantity of each type of light being removed and the quantity and type of light that will replace it.
34. Please estimate based on historical maintenance how many existing street lights are anticipated to be replaced by LG&E over the next five years within Jefferson County. Please provide an anticipated breakdown by rate code based on historical failures and replacements.



35. The Company often promotes technological advancements, including improved communication through web pages and mobile applications such as the LG&E KU ODP mobile app.
- Is there a function on the Company's mobile app that enables a user to report and "Geo-Tag" inoperable or malfunctioning street lighting?
  - If not, does the Company plan to include this capability in any mobile application upgrades, specifically the ability to "Geo-Tag" or more precisely locate the street light?
  - Explain what, if any, improvements the Company has made to its website since the last rate case to report street light outages?
36. Refer to LG&E Tab 62 Schedule I-2 for Public Street & Highway Lighting. The revenue for Public Street and Highway Lighting has decreased each of the most recent five calendar years.
- Please explain why there has been a trend for decreasing revenue for Public Street and Highway Lighting over this 5-year period.
  - Given the decreasing trend over the last 5 years (which actually dates back to 2017 based on prior filings), please explain why the Company expects an increase in revenues from the base year to the test year.
37. Please refer to Public Street & Highway Lighting, LG&E Tab 62 Schedule I-2.
- How much of the base-year revenue is associated with Louisville Metro accounts?
  - How many of the base-year customers are Louisville Metro?
  - Why does the number of customers increase from 702 in the base year to 891 in the test year?
38. Would the Company recognize cost savings if a customer committed to converting large numbers of traditional street lighting to LED street lighting?
39. Under how many different types of customer rate codes does the Louisville Metro currently make payments to LG&E? For each type of class, please provide the following information:

- a. The type of customer rate code;
  - b. The number of Louisville Metro accounts in each such rate code;
  - c. The total amount paid by the Louisville Metro for each such rate code during the last 12 month period; and
  - d. The total net projected impact for each such rate code under the proposed rate increase.
40. Please provide a schedule showing the following information for each current Louisville Metro account for 2023, for 2024 and the first 6 months of 2025 separately by year and not added together.
- a. Applicable tariff.
  - b. Other tariffs that could be applicable to this account.
  - c. Total sum paid.
41. Does LG&E have an estimate or general or specific information on how much revenue is derived from Jefferson County customers? If so, please provide by customer class for each of the last three years as well as a comparison of the percentage of revenue that this constitutes in relation to all revenues.
42. Did the cost of service study prepared for this case include any categories of costs used to determine customer charge which were not included in the cost-of-service study prepared by the Company's witness in the 2020 rate case? If the answer is yes, please list the nature of the costs and the amount.
43. Were there any changes in the methodology in the Company's cost of service study in this case from the 2020 cost of service study? If the answer is yes, please describe the changes.
44. Please provide a copy of every vegetation management plan employed by LGE/KU during the last 5 years for:
- a. distribution lines; and

- b. transmission lines.
- 45. Please provide a listing by type of trees and number of same removed from transmission lines in Jefferson County during this five year cycle.
  - 46. By the categories of high voltage and low voltage transmission lines, please provide how many trees and corridor miles have been cleared and how many remain to be cleared under the current five year plan.
  - 47. Refer to the testimony of Charles R. Schram, especially at pages 9 through 11. Please provide the modeling referenced on page 10, line 2.
  - 48. Refer to the testimony of Peter W. Waldrab, pages 37:6 through 41:23. Please provide 2024 hourly average per customer residential load profiles for each of the Companies. Also, please provide 2024 hourly average per customer load profiles for residential customers participating in the Companies' net metering programs.
  - 49. Refer to the testimony of Peter W. Waldrab, at pages 37:6 through 41:23. Please provide the Companies' line transformer sizing practices, including the types and sizes stocked, the methods or tables used to calculate transformer rating to be installed.
  - 50. Please refer to the proposed changes to NMS-2.
    - a. Please confirm that the Company proposes to decrease the buy-back rate for solar.
    - b. Please confirm that, if the Company's proposed changes to NMS-2 are approved by the Commission, existing customers who made investment decisions on solar generating facilities with a 20-year or greater service life will be impacted based on the proposed changes.
  - 51. Please confirm that KRS 278.466 does not require a utility to cap the cumulative generating capacity of net metering systems reaches one percent (1%) of a utility's single hour peak load during a calendar year.
  - 52. Please explain why the Companies to cap the cumulative generating capacity of net metering systems reaches one percent (1%) of a supplier's single hour peak load during a calendar year.
  - 53. Refer to Rider SSP.

- a. Please confirm that the Company proposed to make Rate RTS and Rate EHLF eligible for the Solar Share Program Rider.
  - b. Please state whether the Company has had any discussions with customers or potential Rate RTS and Rate EHLF customers on whether the customers would elect to participate in the Solar Share Program Rider. If yes, please describe and submit any written communications regarding this issue.
54. Refer to the testimony of John Crocket at pages 6 and 7, regarding LG&E and KU's transmission SAIDI and SAIFI metrics.
- a. For both metrics, the companies experienced significant improvement in reliability in their transmission system from 2017 forward. Please describe what measures were implemented to achieve these reductions in transmission outages in terms of duration and frequency.
  - b. Please provide the annual capital and O&M transmission costs since 2016 for each company.
  - c. Please provide the same information as contained in these two charts broken out for LG&E and KU separately.
  - d. Please provide the companies' SAIDI and SAIFI, both on a combined system basis and on a separate company basis, as compared to the industry's average, top quartile and top decile.
55. Refer to the testimony of John Crocket at page 8 regarding LG&E's gas distribution operations.
- a. Please state whether "Recordable Injury Incident Rate" is an industry standard metric. If this is an industry standard metric, provide the average rate for the most recent year data.
  - b. Please provide the Recordable Injury Incident Rate (RIIR) for LG&E's gas operations for the years 2016 through 2023.
  - c. Please confirm the Recordable Injury Incident Rate target of 1.58 is specifically for LG&E's gas operations.
  - d. Please explain how LG&E's target Recordable Injury Incident Rate of 1.58 was derived and state whether this target rate is constant each year. If the target rate changes yearly, state the factor(s) driving any such change.

56. Refer to the testimony of Lonnie Bellar at page 4, regarding RIIR.
- a. Please confirm that the 2024 RIIR of 1.57 reflects the combined operations of LG&E electric, LG&E gas, and KU electric.
  - b. Please provide the RIIR for LG&E's electric operations for the years 2016 through 2024.
  - c. Please provide the RIIR target rate for LG&E electric for 2024.
57. Refer to the testimony of Lonnie Bellar at pages 6 through 8, regarding the current status of the four projects approved in Case No. 20222-00402. Please provide an update of the EPC selection for the Mercer County and Marion County Solar projects.
58. Refer to the testimony of Elizabeth McFarland at page 8, regarding replacement of wooden transmission poles with steel poles.
- a. Please provide the percentage of transmission poles that are steel and those that are wooden.
  - b. Please state whether LG&E plans on converting additional or all its wooden transmission poles to steel. If so, provide details of that replacement plan.
59. Refer to the testimony of Elizabeth McFarland at page 8, regarding the need to continue improving the transmission system in order to "keep pace with customer expectations for safe and reliable power." Please explain what is meant by the reference to "customer expectations for safe and reliable power" and whether KU and LG&E have conducted any studies or performed any surveys to effectively characterize and measure its customers' expectations for safe and reliable electric service.
60. Refer to page 20 lines 12-14 of the testimony of Charles Schram. Why are volumes for transportation customers forecast to increase more than customers on sales rates?
61. Refer to page 21 lines 1-7 of the testimony of Charles Schram. Has BOSK been operating at full usage from January 2025 to the present?
62. Refer to the testimony of Tom C. Rieth.
- a. Refer to page 2, lines 18-20, how many "emergency" calls were received during the test year and the prior 3 years, and what was the average response time for the prior 3 years? How does LG&E define "emergency"? Is there any national best practice for average length of time for emergency calls?
  - b. Refer to page 3, lines 6-8. Please attach a copy of the multi-year plan.

- c. Refer to page 4, lines 10-14. Please estimate the number of incidents and average length of time of outage resulting from loss of gas supply, which will no longer occur once the Bullitt County pipeline is in operation.
- d. Refer to page 5, lines 11-16. Please provide a summary table of the alternatives reviewed and the estimated cost of each.
- e. Refer to the table on page 6 of your testimony. Please provide the number of public works projects for each of the years described.
- f. Refer to page 7 of your testimony. Please define “hard spot.” Was the existing technology unable to determine whether “hard spots” existed? If that is true, what is the new technology and cost of same required to comply with the PHMSA November 18, 2024 bulletin? Please attach a copy of the bulletin.
- g. Please provide a table showing the total GLT costs broken down by category for the test year and the prior 3 years, as well as the anticipated costs for the prior 3 years, to include the new categories required by LDAR.
- h. Please refer to pages beginning at page 14 and specifically at p. 17. What is the estimated increased cost to LG&E of the 40% completion and also at 100% completion?
- i. Please see the testimony at page 17, lines 17-19. Please provide the proposed language change. How many customers will be affected by this change and what is the estimated increase in cost?