

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR A)	CASE NO.
DECLARATORY ORDER REGARDING THE)	2016-00317
PROPER METHOD OF MUNICIPAL FRANCHISE)	
FEE RECOVERY)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium and an electronic version of the following information. The information requested herein is due no later than April 7, 2017. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

LG&E shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

LG&E fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, LG&E shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. a. Explain whether LG&E acquired the existing natural gas rights of way (“ROW”) for pipelines, through financial payments or other arm’s-length transactions, from the former city of Louisville.

b. If the answer to part a. is yes, explain whether LG&E has those ROW agreements with the former city of Louisville, and whether the acquisition of the ROW was a one-time payment for as long as those pipelines within the ROW are in service.

2. Refer to the Testimony of Lonnie E. Bellar (“Bellar Testimony”), page 9, lines 12–14. State the total franchise fee that would result from using \$.0258 per Mcf.

3. Refer to the Bellar Testimony, page 14, lines 5–9. Explain the basis of LG&E’s understanding that Metro Louisville wants to base the franchise fee on the percentage of natural gas delivered to each customer that passed through Louisville Metro’s rights-of-way.

Talina R. Mathews
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Public Service Commission
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DATED MAR 24 2017
cc: All parties

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