COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES AND FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY	))))	CASE NO. 2016-00371

COMMISSION STAFF'S THIRD 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 an original and six copies in paper medium and an electronic version of the following information. The information requested herein is due no later than February 20, 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 the 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 shall 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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. Refer to Filing Requirement – 807 KAR 5:001, Section 16(8)(d), Electric Operations, Schedule D-1, page 1 of 9.

a. Refer to line 3, Residential. The description of the $2,151,857 adjustment from the base period to the forecasted test period reads, "Variance reflects forecasted increase in billing determinants from the base period to the forecasted period at current tariff rates." Provide the reason(s) for the increase in the billing determinants and explain how the amount of the increase was determined.

b. Refer to line 4, Commercial. The description of the ($3,705,615) adjustment from the base period to the forecasted test period reads, "Variance reflects forecasted decrease in billing determinants from the base period to the forecasted period at current tariff rates." Provide the reason(s) for the decrease in the billing determinants and explain how the amount of decrease was determined.

c. Refer to line 5, Industrial. The description of the $5,208,053 adjustment from the base period to the forecasted test period reads, "Variance reflects forecasted increase in billing determinants from the base period to the forecasted period at current tariff rates." Provide the reason(s) for the increase in the billing determinants and explain how the amount of the increase was determined.

d. Refer to line 6, Public Street and Highway Lighting. The description of the $148,953 adjustment from the base period to the forecasted test period reads, "Variance reflects forecasted increase in billing determinants from the base period to the forecasted period at current tariff rates." Provide the reason(s) for the increase in the billing determinants and explain how the amount of the increase was determined.

e. Refer to line 7, Other Sales to Public Authorities. The description of the ($369,552) adjustment from the base period to the forecasted test period reads, "Variance reflects forecasted decrease in billing determinants from the base period to the forecasted period at current tariff rates." Provide the reason(s) for the decrease in the billing determinants and explain how the amount of decrease was determined.

f. Refer to line 13, Late Payment Charges. The description of the ($257,003) adjustment from the base period to the forecasted test period reads, "Variance reflects trend in this account and is based on a historic average." Provide supporting work papers, spreadsheets, etc., which show the derivation of this adjustment, along with any necessary narrative explanation.

g. Refer to line 14, Electric Service Revenues. The description of the $87,180 adjustment from the base period to the forecasted test period reads, "Variance reflects trend in this account and is based on a historic average." Provide supporting work papers, spreadsheets, etc. which show the derivation of this adjustment along with any necessary narrative explanation.

h. Refer to line 15, Rent from Electric Property. The description of the ($19,368) adjustment from the base period to the forecasted test period reads, "Variance reflects trend in this account and is based on a historic average." Provide supporting work papers, spreadsheets, etc., which show the derivation of this adjustment along with any necessary narrative explanation.

i. Refer to line 16, Other Miscellaneous Revenue. The description of the $2,002,258 adjustment from the base period to the forecasted test period reads, "Variance reflects increase in transmission revenues." Provide supporting work papers, spreadsheets, etc., which show the derivation of this adjustment along with any necessary narrative explanation.

2. Refer to Filing Requirement – 807 KAR 5:001, Section 16(8)(d), Gas Operations, Schedule D–1, page 1 of 7.

a. Refer to line 3, Residential. The description of the $20,666,737 adjustment from the base period to the forecasted test period reads, "Variance is primarily driven by the GLT reset." Provide any other reason(s) for the increase in revenue and explain how the amount of the increase was determined.

b. Refer to line 4, Commercial. The description of the $8,076,226 adjustment from the base period to the forecasted test period reads, "Variance is primarily driven by the GLT reset." Provide any other reason(s) for the increase in revenue and explain how the amount of the increase was determined.

c. Refer to line 5, Industrial. The description of the $1,249,411 adjustment from the base period to the forecasted test period reads, "Variance is primarily driven by the GLT reset." Provide any other reason(s) for the increase in revenue and explain how the amount of the increase was determined.

d. Refer to line 6, Other Sales to Public Authorities. The description of the $1,006,367 adjustment from the base period to the forecasted test period reads, "Variance is primarily driven by the GLT reset." Provide any other reason(s) for the increase in revenue and explain how the amount of the increase was determined.

e. Refer to line 12, Forfeited Discounts. The description of the $46,409 adjustment from the base period to the forecasted test period reads, "Variance reflects trend in this account and is based on a historic average." Provide supporting work papers, spreadsheets, etc., which show the derivation of this adjustment, along with any necessary narrative explanation.

f. Refer to line 13, Miscellaneous Service Revenue. The description of the ($16,022) adjustment from the base period to the forecasted test period reads, "Variance reflects trend in this account and is based on a historic average." Provide supporting work papers, spreadsheets, etc., which show the derivation of this adjustment along with any necessary narrative explanation.

3. Refer to Filing Requirement – 807 KAR 5:001, Section 16(8)(d), Gas Operations, Schedule D–1, page 5 of 7, Line 80, Uncollectible Accounts. The description of the $163,151 adjustment from the base period to the forecasted test year

reads, "Forecasted test year includes write-offs based on a five-year average 0.226 percent of revenues." Explain why LG&E chose to use a higher amount of bad-debt expense when the trend appears to be decreasing and the proposed Advanced Metering Systems ("AMS") could result in less bad-debt expense.

4. Refer to the Application, Direct Testimony of John P. Malloy, Exhibit JPM-1, page 38 of 169. Provide the tables on this page with a breakdown of the amounts between LG&E and its sister company, Kentucky Utilities Company ("KU").

5. Refer to the Application, Direct Testimony of William Steven Seelye, Exhibit WSS-7. Provide the "Unit Cost of Service Based on the Cost of Service Study" for each rate class. Provide the response in Excel spreadsheet format with the formula intact and unprotected.

6. Refer to the responses to Commission Staff's First Request for Information ("Staff's First Request"), Items 61.a. and 61.b. Provide the comparable information for calendar years 2014 and 2016 in the same format.

7. Refer to LG&E's response to Commission Staff's Second Request for Information ("Staff's Second Request"), Item 5. Explain how the 30 percent maximum increase for any light was determined.

8. Refer to LG&E's response to Staff's Second Request, Item 8.

a. Provide this response in Excel format with the formulas intact and unprotected.

b. Confirm that the proposed rates as calculated on page 1 of 6 will change if the Commission approves an energy rate for Rate Schedule GS different from that proposed by LG&E.

c. Confirm that the proposed rates as calculated on page 1 of 6 will change if the Commission approves a return on equity ("ROE") different from the 10.23 percent proposed by LG&E which was used to calculate the levelized fixed charge percentage on page 4 of 6.

9. Refer to LG&E's response to Staff's Second Request, Item 14.

a. State when interstate pipelines began limiting LG&E's ability to take gas to $1/24^{th}$ of the daily quantity being delivered to LG&E for the customer.

b. State whether LG&E is specifically limited to taking $1/24^{th}$ of each customer's gas, or whether LG&E is generally required to take $1/24^{th}$ of its interstate pipeline deliveries.

c. State whether LG&E has incurred interstate pipeline penalties or suffered some adverse action due to customers' failure to have $1/24^{th}$ of daily quantities delivered. If so, provide details concerning these events. If not, explain why LG&E is proposing the change to P.S.C. Gas No. 11, Original Sheet Nos. 30.9, Firm Transportation Service, paragraph 4 and 51.4, TS-2 Rider, paragraph 3 for Rate FT and Rider TS-2 customers.

d. Item 14 of Staff's First Request asked that LG&E provide the impact of the proposed change on the customers that will be most affected. No customer impact was provided. State whether there is no customer impact because customers are currently taking $1/24^{th}$ of their daily quantity, or otherwise provide as requested the impact on the customer that will be most affected.

10. Refer to LG&E's response to Staff's Second Request, Item 18.d.

a. Explain why the costs in the base period for Mill Creek Unit 2 are significantly more than those of the other Mill Creek units.

b. Explain why the costs in the base period are so much greater than those in the test period for Mill Creek Unit 4.

11. Refer to LG&E's response to Staff's Second Request, Item 22. Explain what happens if a damaged meter base prevents the installation of an AMS meter, the customer refuses to sign the waiver, and the customer does not hire a contractor to repair the meter base.

12. Refer to LG&E's responses to Staff's Second Request, Items 26 and 53, and the Excel attachment to Item 26. Compare the current Gas Transport Service, FT Industrial customer count with the base period and forecast test period customer counts.

13. Refer to LG&E's response to Staff's Second Request, Item 37.e.

a. Explain the basis for the reduction in headcount from 1,059 for the 12 months ended June 30, 2016, to 1,045 for the 12 months ending June 30, 2018.

b. Provide the headcount for LG&E and KU Services Company for the 12 months ended June 30, 2016, the base year and test year.

14. Refer to LG&E's response to Staff's Second Request, Item 40. The response shows that Paddy's Run units 11 and 12 had a capacity factor of 0.10 percent in 2016. Explain if these units were operated because generation was needed, or if they were operated for testing/maintenance purposes.

15. Refer to LG&E's response to Staff's Second Request, Item 41.

a. State whether this response indicates that 35 percent of LG&E's customers will receive no benefit from the proposed Distribution Automation ("DA") program.

b. State whether the sole purpose of the DA program is to improve SAIDI and SAIFI performance.

16. Refer to LG&E's response to Staff's Second Request, Item 43.

a. Confirm that between the years of 2016–2022 the operations and maintenance ("O&M") savings is $480,000 and the O&M costs are $6 million.

b. Provide the annual number of outages greater than three hours for the past five years.

17. Refer to LG&E's response to Staff's Second Request, Item 45. State the impact of the difference between the estimated termination payment on the interest rate swap of $13 million contained in its Application and the actual termination payment of $9.409 million on LG&E's revenue requirement in the test year.

18. Refer to LG&E's response to Staff's Second Request, Item 51. For each authorized ROE for the proxy group of gas and electric utilities, provide the date of the authorized ROE awarded by each respective regulatory agency.

19. Refer to LG&E's response to Staff's Second Request, Item 60.a., which states that "[t]he meters installed as part of the DSM AMS program do not have remote service switches."

a. Explain if LG&E will replace all of these meters installed as part of the DSM AMS program with new meters containing the remote service switch.

b. State the number of meters LG&E has installed to date in connection with its DSM AMS program.

20. Refer to LG&E's response to Staff's Second Request, Item 62.a.

a. Refer to the attachment, pages 3 and 8 of 10. Identify the replacement plant that is referenced in line 1.

b. Explain what is shown on, and the purpose of, pages 4–5 and 9–10 of the attachment.

c. Explain how LG&E concluded that a .8 percent opt-out estimate is reasonable.

21. Refer to LG&E's response to Staff's Second Request, Item 62.b. A reason given for not allowing an opt-out for an AMS meter is the possibility that meters in a remote location must "hop" or communicate with each other, and a missing meter creates a hole that may increase costs to communicate with the remaining meters.

a. Explain whether hops can occur in densely populated areas.

b. If opt-outs are permissible, provide an estimate and supporting work papers for the number of hops LG&E anticipates in its service territory.

22. Refer to LG&E's response to Staff's Second Request, Item 63.a.

a. State whether data transmission four times per day will be the upper limit. If not, provide the maximum number of times per day data will be transmitted.

b. Explain what "working to remotely read all MV 90 meters" entails.

23. Refer to LG&E's response to Staff's Second Request, Item 63.e. The response states that there are about 30,000 customers whose premises do not have

cellular coverage and that it may be costly to serve those premises with the mesh network.

a. Explain if LG&E and KU have contacted the cellular provider regarding the lack of coverage for these customers.

b. Explain if the 30,000 customers are predominantly rural customers wholly within KU's service territory.

24. Refer to LG&E's response to Staff's Second Request, Item 64.d. Explain how LG&E determined the pipeline route, and describe the status of LG&E's negotiations and acquisitions of private easements. Include the number of private easements necessary for the project, the number of private easements obtained to date, and whether LG&E anticipates any changes to the project scope, timeline, or estimated cost as a result of its current status for obtaining private easements

25. Refer to LG&E's response to Staff's Second Request, Item 64.e., which states that the purpose of the pipeline is to bolster the reliability of LG&E's system, and to LG&E's response to the Attorney General's Initial Data Request ("AG's First Request"), Item 432.c.

a. Provide the existing and projected demand on LG&E's system in the Bullitt County area. Include support for all calculations and underlying assumptions, including projections for growth from state or local sources.

b. Describe the existing and proposed capacity of LG&E's system in the Bullitt County area. Include supporting calculations.

c. Provide LG&E's annual customer counts for all classes for Mt. Washington, Shepherdsville, Clermont, Lebanon Junction, and Boston, and for the

Bullitt County portion of its system generally, for years 2012 through 2016, and estimates of annual customer counts related to that same area for years 2017 through 2021. The information provided should indicate how much of the anticipated growth in customer counts will be due to customer additions to currently existing lines, to the proposed pipeline construction, and whether from new or established developments.

d. Confirm that the proposed construction will make natural gas available to areas that currently do not have access to gas service. If so, provide an estimate of new customer additions and associated growth in sales volumes for 2017 through 2021.

e. Provide a discussion of the adequacy of pressure in the existing Bullitt County system, and explain whether LG&E has experienced any customer outages in this area due to inadequate system capacity to meet system demand.

f. State all assumptions, show all calculations, and provide all work papers used to derive the estimated $27.6 million project cost. Where such calculations and work papers are in Excel worksheet format, provide an electronic copy in Excel format.

g. Provide the incremental annual O&M expense associated with the ongoing operation of the new pipeline. State all assumptions, show all calculations, and provide all work papers used to derive the estimated annual incremental O&M costs. Where such calculations and work papers are in Excel worksheet format, provide an electronic copy in Excel format.

h. State how LG&E intends to finance the pipeline project.

26. With regard to the proposed $27.6 million, 10- to 12-mile Bullitt County gas pipeline project, provide all information not otherwise already in the record of this proceeding in compliance with KRS 278.020(1), KRS 322.340, 807 KAR 5:001, Sections 4, 7, 14, and 15(2).

27. Refer to LG&E's response to Staff's Second Request, Item 65.

a. When were LG&E's Transmission and Distribution Integrity Plans ("T&D Integrity Plans") implemented?

b. Explain why it is now necessary for four new positions to support the T&D Integrity Plans.

c. Identify and describe in detail the projects and costs LG&E has incurred to date with the T&D Integrity Plans.

28. Refer to LG&E's response to Staff's Second Request, Item 68.

a. Provide the normal pace of replacement of transmission lines absent the Commission's approval of the proposed accelerated three-year program, along with the typical associated annual expense.

b. The response to Item 68.b., which is labelled 68.i. in LG&E's response, states that the portion of the system proposed for replacement was constructed with the material available between 1957 and 1972. Describe the material of which the 15.5 miles of transmission line is composed.

29. Refer to LG&E's response to Staff's Second Request, Item 69. Confirm that the Transmission Modernization Program is expected to be completed in 2019, with no further expenditures in 2020 and beyond, and provide estimated rates by customer

class for the proposed Gas Service Line Replacement Program beginning with 2020 through the remainder of the proposed program.

30. Refer to LG&E's responses to Staff's Second Request, Items 73 and 85.

a. Confirm that the electric customer whose special contract is being terminated is also the sole gas customer to be switched from sales service to proposed Rate SGSS.

b. Despite the reference to "certain customers" and "these customers" on page 46 of the Direct Testimony of Robert Conroy, state whether LG&E knows of any other customer(s) likely to be served pursuant to the proposed SGSS tariff in the next five years.

31. Refer to LG&E's response to Staff's Second Request, Item 82, and to the November 4, 2016 Order in Case No. 2016-00274[1] approving the Solar Share Program Rider ("Solar Share Order"). Refer to pages 11–12 of the Solar Share Order. Provide the calculation of the Solar Capacity Charge using LG&E's proposed ROE in Excel format with the formulas intact and unprotected.

32. Refer to LG&E's response to Staff's Second Request, Item 84. State whether LG&E would be willing to continue the inclusion of the Gas Supply Cost Component on its various rate schedules for the convenience of those who access LG&E's and other jurisdictional gas utilities' tariffs online through the Commission's Web site.

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[1] Case No. 2016-00274, *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Approval of an Optional Solar Share Program Rider* (Ky. PSC Dec. 12, 2016).

33. Refer to LG&E's response to Staff's Second Request, Item 92.b.(1) and (2).

a. Given that LG&E is exploring ways to modify Rate PS, and given the AMS proposed in the Application, is there a PS – Time-of-day rate tariff that LG&E can propose in this proceeding? If not, explain.

b. State whether adopting a PS – time-of-day rate would impact revenues so that LG&E would propose to do so only as part of a rate proceeding. If not, and if not done in this proceeding, state when LG&E would anticipate filing for approval of a PS – time-of-day tariff.

34. Refer to LG&E's response to Staff's Second Request, Item 95. Provide the supporting calculations for each of the percentages shown for the three rate classes listed.

35. Refer to LG&E's response to Staff's Second Request, Item 96.d.

a. The response indicates that secondary combustion turbines ("CTs") are operated primarily for testing and emergencies. State whether it is considered to be an emergency when a curtailment is implemented.

b. Prepare and provide an analysis which calculates the amount of CSR credits that would result if all of LG&E's and KU's CTs were used in the calculation, rather than just large-frame CTs.

36. Refer to LG&E's response to Staff's Second Request, Item 98. Provide documentation supporting the statement, "The Company's lighting vendors have indicated to the Company that the average service life of an LED fixture is lower than conventional fixtures."

37. Refer to LG&E's response to Staff's Second Request, Item 107. State whether the word "production" was included in the response in error. If not, explain what is meant by "production income."

38. Refer to LG&E's response to Staff's Second Request, Item 111. Given the per-unit results contained in the Excel spreadsheets, explain why LG&E is proposing to increase the Rate TOD Secondary basic service charge to $200.00.

39. Refer to LG&E's response to Staff's Second Request, Item 113.b. State whether the cost-of-service studies filed in this proceeding support the $.06934 Lighting Energy Service rate. Include in the response the amounts and location in the cost-of-service studies that support the $.06934.

40. Refer to LG&E's response to Staff's Second Request, Item 113.c.

a. This response states that O&M expenses are expected to occur every 13 years for LED fixtures and every six years for traditional lighting fixtures. Despite the higher upfront cost of LED fixtures as compared to traditional lighting fixtures, explain if it is cost beneficial to LG&E to install LED fixtures rather than traditional fixtures, given that traditional fixtures use more energy and require O&M expense roughly twice as often as LED fixtures.

b. Provide the calculation for the O&M expenses for all lights in Exhibits WSS-4 and WSS-5.

41. Refer to LG&E's response to Staff's Second Request, Item 116. Explain why the split between Primary and Secondary differs from those calculated in the cost-

of-service study filed in LG&E's most recent base rate proceeding, Case No. 2014-00372.[2]

42. Refer to LG&E's response to Staff's Second Request, Item 120. LG&E states that it proposes to true-up the regulatory liability amortization based on the actual fees received as of the end of the base period.

a. Explain why LG&E is not proposing to include an expected level of revenues related to the refined coal production facilities in the forecasted test year.

b. Provide the level of revenues expected to be received in the forecasted test year.

43. Refer to the response to Kentucky Industrial Utility Customers, Inc.'s First Request for Information ("KIUC's First Request"), Items 11 and 12. State the amounts and explain in detail how the amounts of demolition costs for Paddy's Run and Cane Run are reflected in LG&E's revenue requirement for the test year.

44. Refer to LG&E's response to KIUC's First Request, Item 17, and LG&E's response to the AG's First Request, Item 339. Explain why the Commission should accept a 15-year depreciation life for the proposed AMS meters when LG&E acknowledges that the meters have an expected service life of 20 years and the AMS cost-benefit summary using a 15-year period shows a net cost (in net present value) as compared to the cost-benefit summary using a 20-year period, which shows a net benefit.

[2] Case No. 2014-00372, *Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates* (Ky. PSC June 30, 2015)

45. Refer to LG&E's response to KIUC's First Request, Item 67. Explain why a discount rate of 10.6 percent is used in this analysis but a 6.62 percent rate was used in the Application, Exhibit JPM-1, page 38 of 169.

46. Refer to LG&E's response to KIUC's First Request, Item 73. Given the response, state whether LG&E is agreeable to reducing the Curtailable Service Rider credit non-compliance charge. If so, state the effect this change would have on revenue requirements for the test year.

47. Refer to LG&E's response to KIUC's First Request, Item 94, and LG&E's response to Commission Staff's First Request, Item 53. If the Commission were not to approve the change in ratchet percentages proposed by LG&E, provide the effect it would have on the revenue at proposed rates for the following rate classes: TODS, TODP, and RTS.

48. Refer to LG&E's response to the First Request for Information of the Kentucky School Boards Association ("KSBA's First Request"), Item 1.c. Explain how the investment in the infrastructure required to enable AMS meter functionality and the back-office overhead to schedule and manage the installation is allocated in the cost-of-service studies.

49. Refer to LG&E's response to KSBA's First Request, Item 14. Provide supporting documentation for the statement that "[t]he current maintenance cost included in the majority of the LED rate codes exceeds the maintenance cost included in the rate codes of the HPS, Mercury Vapor, and Metal Halide lights."

50. Refer to LG&E's response to KSBA's First Request, Item 15. State whether a light controlled by a timer, or otherwise remotely controlled, would still be charged the full lighting rate in the tariff, regardless of its level of use.

51. Refer to LG&E's response to KSBA's First Request, Item 19. Provide an explanation of a demand loss factor.

52. Refer to LG&E's response to the AG's First Request, Item 260. Describe the Interim Final Rule regarding underground storage, and when and how it is expected to impact LG&E.

53. Refer to LG&E's response to the AG's First Request, Item 282. Provide the most current Blue Chip Financial Forecasts provided in WP-13 that is currently available to LG&E.

54. Refer to LG&E's response to the AG's First Request, Item 294.a., Excel spreadsheet.

a. Explain why all hours do not have a LOLP.

b. Explain how the amounts in the "Expected Unserved Energy MWh" were calculated.

55. Refer to LG&E's response to the AG's First Request, Item 328.

a. Provide an update to this response regarding the discussions with Landis+Gyr.

b. State whether LG&E has reason to believe that a warranty longer than five years can be obtained.

56. Refer to LG&E's response to the AG's First Request, Item 357.

a. State the amount LG&E is currently charging for remotely disconnecting/reconnecting customers with advanced meters.

b. Confirm that LG&E's current disconnect/reconnect charge is based on a visit to the customer's premises and manually disconnecting/reconnecting the meter.

c. State whether LG&E plans to propose a remote disconnect/reconnect charge for customers with advanced meters. If not, explain.

57. Refer to LG&E's response to the First Set of Data Requests of Metropolitan Housing Coalition, Item 15. Explain why LG&E has no plans to offer prepayment services to its customers.

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