

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	CASE NO.
UTILITIES COMPANY FOR AN ADJUSTMENT)	2018-00294
OF ITS ELECTRIC RATES)	

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due no later than February 14, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked. 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.

KU 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 KU 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, KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. State whether KU included any penalties or fines assessed pursuant to KRS 278.990 in the base or forecasted period. If so, provide the location of these amounts.

2. Provide KU's cost of complying with KRS 367.4909 for calendar years 2015 through 2017, the base period, and the forecast period. Separately identify internal and external labor.

3. Explain KU's process for determining who is at fault for incidents of damage to underground utility facilities. Include in the response an organizational chart of decision makers, including job title.

4. If KU determines that a third-party excavator was at fault for any damage to KU's underground facilities, state whether KU would seek to collect expenses incurred to repair damage to underground utility facilities from the third-party excavator. If so, explain

KU's process for collecting these expenses. Include in the response whether KU charges the excavator for 100 percent of the associated repair costs and if not, explain why not.

5. State whether KU included any expenses for participation in the Kentucky 811 One-call Center in the base or forecasted period. If so, provide the location of these amounts.

6. State whether KU included any expenses in the base or forecasted periods for repairing excavator damage to underground utility facilities caused by an at-fault third-party excavator. If so, provide the location of these amounts, a breakdown of internal and external labor costs, and a comparison of amounts billed to and collected from at-fault excavators for repairs.

7. State whether KU included any expenses incurred in the base or forecasted test periods to repair excavator damage to underground utility facilities in cases in which KU was at fault for the damage. If so, provide the location of these amounts and a breakdown of internal and external labor costs.

8. For calendar years 2014 through 2018, provide the number of locate requests for underground utility facilities and the number and percentage of the requests that were fulfilled within two business days.

9. State whether KU has a backlog of late underground utility facility locate requests and, if so, the steps that have been or will be taken to resolve the backlog.

10. Refer to KU's Response to Staff's Third Request for Information (Staff's Third Request), Item 1(f). Over the past five calendar years, indicate how many customers have had underground facilities installed by an entity other than KU.

11. Refer to KU's Response to Staff's Second Request for Information, Item 1(n), which states that refunds will be provided during any year during which another customer connects to the extension. Also refer to KU's Response to Staff's Third Request, Item 1(e), which states that annual refunds are time consuming and labor intensive and that KU will review any contracts that are approaching the 10-year refund expiration date and issue refunds at that time.

- a. Explain the discrepancy between these two responses.
- b. Provide the definition or criteria used to determine if an activity is "time consuming and labor intensive."
- c. Provide support for the statement that annual refunds are time consuming and labor intensive.

12. Refer to KU's Response to Staff's Third Request, Item 26. Confirm that costs incurred prior to the effective date of any Commission approval would not be passed through to KU's Attachment Customers.



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DATED JAN 31 2019

cc: Parties of Record

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