

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS)	
AND ELECTRIC COMPANY FOR AN)	CASE NO.
ADJUSTMENT OF ITS ELECTRIC AND GAS)	2018-00295
RATES)	

COMMISSION STAFF'S POST-HEARING 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 an electronic version of the following information. The information requested herein is due on or before March 20, 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.

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 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 the testimony of Lonnie Bellar at the March 5, 2019 hearing at 10:51:15 a.m. Provide the estimated time frame in which a vendor could develop technology to perform multi-diameter inspections on LG&E's gas transmission pipelines.

2. Refer to LG&E's P.S.C. Electric No. 11, Original Sheet No. 40.2 and proposed P.S.C. Electric No. 12, Original Sheet No. 40.3. The original tariff language includes in the definition of telecommunications carrier "internet service providers, voice over internet protocol service providers, cellular and mobile phone service providers or resellers of such services." The proposed tariff removes this language. Explain why the language at the end of the definition of telecommunications carrier was removed.

3. Refer to LG&E's proposed PSC Electric No. 12, Original Sheet No. 40.4. Under the "Terms and Conditions of Attachment" section, numbered paragraph "1. Contract for Attachment to Company Structures," it states that "No Attachments shall be made to Company's Structures until Attachment Customer has executed a Contract for Attachment to Company Structures, in a form substantially similar to that which is included

at the end of this Schedule.” There does not appear to be a “Contract for Attachment to Company’s Structures”-related form at the end of the Schedules. Provide the location in the Schedules where the subject form can be located. If the form is not currently in the proposed tariff, provide a copy of the form.

4. Refer to LG&E’s P.S.C. Electric No. 11, Original Sheet No. 57 and proposed P.S.C. Electric No. 12, Original Sheet No. 57. The language of the original tariff under the second paragraph of the “Metering and Billing” section provides: “If Customer takes service under time-of-use or time-of-day rate schedule, Company will apply billing-period credits Customer creates in a particular time-of-day or time-of-use block only to offset net energy consumption in the same time-of-day or time-of-use blocks **in any billing period.**” (Emphasis added). The proposed tariff removes the phrase “in any billing period.” Explain this change.

5. Refer to LG&E’s P.S.C. Electric No. 11, First Revision of Original Sheet No. 106.4 and proposed P.S.C. Electric No. 12, Original Sheet No. 106.4. Refer also to Kentucky Utilities Company’s (KU) P.S.C. No. 18, Original Sheet No. 106.3 and proposed P.S.C. No. 19, Original Sheet No. 106.3. Explain why the proposed changes to KU’s Individual Premises section were not also made to the second provision of LG&E’s Individual Premises section.

6. Refer to LG&E’s P.S.C. Electric No. 11, First Revision of Original Sheet No. 106.4 and proposed P.S.C. Electric No. 12, Original Sheet No. 106.4.

a. Provide an explanation for the deletion of the language contained in numbered paragraphs 3 and 4 under the Medium Density Subdivisions subsection relating to advancements and refunds.

b. Also, refer to KU's P.S.C. No. 18, First Revision of Original Sheet No. 106.4 and proposed P.S.C. No. 19, Original Sheet No. 106.4. Explain why these same deletions were not proposed in KU's tariff.

7. Refer to LG&E's P.S.C. Electric No. 11, First Revision of Original Sheet No. 106.4, P.S.C. Electric No. 11, Original Sheet No. 106.5, and proposed P.S.C. Electric No. 12, Original Sheet No. 106.4.

a. Provide an explanation for the deletion of the language contained in numbered paragraphs 2 and 3 under LG&E's High Density Subdivisions subsection relating to advancements for required trenching and backfilling.

b. Also, refer to KU's P.S.C. No. 18, First Revision of Original Sheet No. 106.4, P.S.C. No. 18, Original Sheet No. 106.5, proposed P.S.C. No. 19, Original Sheet No. 106.4, and proposed P.S.C. No. 19, Original Sheet No. 106.5. Explain why these same deletions were not proposed in KU's tariff.

8. Refer to LG&E's response to Staff's Fourth Request for Information, Item 15(a), relating to the proposed revisions to LG&E's overhead line extensions beyond 1,000 feet. If the Commission were to accept LG&E's proposal to delay line extension refunds until closer to the ten-year expiration date, indicate whether the refunds would include interest, and if so, indicate how the interest component would be calculated.

9. Refer to LG&E's response to Staff's Fourth Request for Information, Item 15(b), relating to proposed revisions to LG&E's overhead line extensions beyond 1,000 feet.

a. Indicate how many active electric customer extension contracts in excess of 1,000 feet LG&E has.

b. Of the active extension contracts, indicate how many have required refunds be issued during the last year.

c. Indicate the average amount of those refunds.

d. Indicate how many employees are involved in the refund process.

e. On average, indicate how long it takes to process one such refund.

10. Refer to the Settlement Tariff, LG&E's P.S.C. Gas No. 12, Original Sheet Nos. 30.6 (Rate FT) and 36.8 (Rate LGDS). Also, refer to LG&E's current tariff, P.S.C. Gas No. 11, Fourth Revision of Original Sheet No. 30.6 and 36.8. Also, refer to LG&E's Application, Tab 6, Exhibit C, pages 48–49 and 51–52 of LG&E's full notice to its customers.

a. For the daily demand charge on Sheet Nos. 30.6 and 36.8 of the Settlement Tariff both of which shows \$0.1657 per Mcf, explain why the amounts for this charge do not match the amounts in LG&E's current tariff which shows \$0.1648 per Mcf, given that the current tariff was updated effective November 1, 2018, and no change was initially proposed in this case.

b. For the daily storage charge on Sheet Nos. 30.6 and 36.8, explain why the amount in the settlement reverted back to the amount in LG&E's current tariff given that the customer notice indicated that this charge was increasing.

11. Refer to the Settlement Tariff, LG&E's P.S.C. Gas No. 12, Original Sheet No. 52.1. Also, refer to LG&E's Application, Tab 6, Exhibit C, page 54 of LG&E's full notice to its customers. Explain why there was a change to the Gas Meter Pulse Service Rates in the Settlement Tariff when the original application did not contain a change to

these rates. If the Gas Meter Pulse Service Rates are being changed, provide cost support for these charges.

12. Provide updated versions of the following exhibits in the Direct Testimony of Steven Seelye in Excel format:

- a. WSS-4, Cost Support for LED Fixtures and Underground Poles
- b. WSS-5, Cost Support for LED Conversion Fee
- c. WSS-6, Cost Support for Solar Share Capacity Charges
- d. WSS-7, Cost Support for Electric Vehicle Supply Equipment Rate

Rider

- e. WSS-15, Cost Support for Excess Facilities Rider
- f. WSS-17, Cost Support for Electric Meter Pulse Charge

13. Provide a copy in Excel format of Exhibits 3, 4, and 5 to the Settlement LG&E gas and electric operations based on the proposed revenue allocation.

14. Provide a copy of any agreements or memorandum of understanding between LG&E and low-income agencies setting forth how data relating to eligible customer participants in low-income utility assistance is collected and shared between the low-income agencies and LG&E.

15. Refer to KU/LG&E Hearing Exhibit 1. Provide the same schedule for LG&E gas operations.

16. Provide a copy of the Metropolitan Housing Coalition's operating manual with LG&E.

17. Provide a revised Exhibit J in support of the stipulation.

18. Refer to LG&E's February 25, 2019 Supplemental Response to Staff's Fourth Request for Information, Item 3.

a. Explain every basis for the increase in total gas operating expense for line locations from \$2.3 million in 2017 to \$4.16 million in the base period, including the extent to which and why each basis resulted in an increase in cost from 2017 to the base period.

b. Explain every basis for the increase in total electric operating expense for line locations from \$1.3 million in 2017 to \$3.7 million in the base period, including the extent to which and why each basis resulted in an increase in cost from 2017 to the base period.

c. Explain any change in the cost of contractors from 2017 to the base period, including the amount by which the change in contractors increased the cost of each line location, when the change occurred, and any difference in contractor costs between KU and LG&E.

d. Provide the amount of the operating expense for gas and electric, separately, shown in LG&E's February 25, 2019 Supplemental Response that LG&E attributes to work identifying lines to permit Google Fiber to construct its network in 2017 and 2018 (if amounts or any portions thereof were projected, include any amounts that were projected as a result of anticipated costs related to Google Fiber's network).

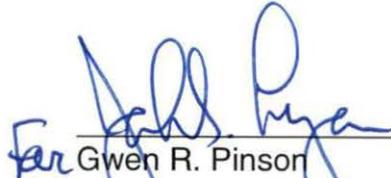
e. If LG&E contends that the increase in operating expense was the result of a backlog in requests for line locations, state whether that back log has been cleared and, if not, when LG&E expects it to be cleared; and explain why LG&E contends

that operating expenses arising from clearing a backlog in line location requests should be included in the revenue requirement when setting base rates.

f. If the operating expenses for line locations in the base period are projected, provide the actual expenses.

g. Explain how LG&E projected its operating expenses for line locations from the base period to the test period.

h. Explain every basis for the increase in total gas operating expense for line locations from \$4.16 million in the base period to \$5.05 million in the test period, including the extent to which and why each basis resulted in a projected increase in cost from the base period to the test period.


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DATED MAR 11 2019

cc: Parties of Record

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