

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF	)	
KENTUCKY UTILITIES COMPANY AND	)	
LOUISVILLE GAS AND ELECTRIC	)	CASE NO.
COMPANY FOR AN ORDER APPROVING	)	2018-00304
THE ESTABLISHMENT OF REGULATORY	)	
LIABILITIES AND REGULATORY ASSETS	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
TO KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC  
COMPANY

Kentucky Utilities Company (KU) and Louisville Gas and Electric Company (LG&E) (jointly, KU/LG&E), pursuant to 807 KAR 5:001, shall file with the Commission the original and an electronic version of the following information. The information requested herein is due no later than December 7, 2018. Responses to requests for information 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/LG&E shall make timely amendment to any prior response if KU/LG&E 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/LG&E fails or refuses to furnish all or part of the requested information, KU/LG&E 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/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 Attorney General's Hearing Exhibit 14. Provide the portion of the operation and maintenance (O&M) variance shown for Storm Damage and Vegetation Management, identified separately, for the July 2018 year-to-date and October 2018 year-to-date periods.

2. Refer to the Attorney General's Hearing Exhibit 1, which contains KU/LG&E's response to Commission Staff's Second Request for Information, Item 3. Refer specifically to the table on page 4 of 5 of that response. Confirm whether the LG&E

storms identified as “Jul 2004 Derecho” and “Feb 2014 Ice Storm” were categorized internally by LG&E as a Level 4 storm event.

3. If level of expense is a criteria for KU and LG&E to request regulatory asset treatment of storm damage regardless of whether a storm is categorized as a Level 4 storm, explain why LG&E did not formally request Commission approval to establish a regulatory asset for the two storms, identified in Item 2 above, in light of the fact that the expenses related to those two storms are greater than the costs associated with the accounting deferral request being made for the July 20, 2018 storm in the instant proceeding.

4. Provide KU/LG&E’s internal procedure and underlying criteria for determining whether to request a regulatory asset be established for storm damage expenses.

5. Provide the industry best practices policy or guideline referenced during the hearing, which KU/LG&E relies upon in establishing the four levels of storm events.



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DATED NOV 30 2018

cc: Parties of Record

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