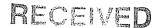
Volume 3 LGE Response to AG

.



MAR 15 2010

CASE NO. 2009-00549

PUBLIC SERVICE COMMISSION

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 166

- Q-166. For any asset retirement obligations identified above, please provide the "fair value" of the obligation. For the purposes of the question, fair value means "the amount at which that liability could be settled in a current [not future] transaction between willing parties, that is, other than in a forced or liquidation transaction." Please provide all assumptions and calculations underlying these amounts.
- A-166. See response to Question No. 165.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 167

- Q-167. Please provide the "credit adjusted risk free rate" used for any and all ARO calculations under FASB Statement No. 143, FIN 47, and FERC Order No. 631 calculations to date.
- A-167. The "credit adjusted risk free rate" used for FASB Statement No. 143 was 6.61%. The "credit adjusted risk free rate" for FIN47, provided by E.ON AG was 5.668% and 5.837% for assets whose remaining lives were 17 years and 30+ years, respectively. FERC Order No. 631 does not have separate calculations.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 168

- Q-168. Please provide complete copies of all Board of Director's minutes and internal management meeting minutes from 2005-2008, inclusive, in which any or all of the following subjects were discussed: the Company's electric plant depreciation rates; retirement unit costs; SFAS No. 143; FIN 47; and, FERC RM02-7-000.
- A-168. See attached CD, in folder titled Question No. 168.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 169

- Q-169. Please provide all accounting entries (debits and credits) relating to SFAS No. 143 and FIN 47, along with all workpapers supporting those entries. Please provide all these workpapers and calculations in electronic format (Excel) with all formulae intact.
- A-169. See attached for test year journal entries. Also, see attached CD, in folder titled Question No. 169 for the electronic format. See response to KPSC-1 Question No. 56(b) for implementation journal entries.

Louisville Gas and Electric Company Journal Entries related to FASB 143 Test Year November 2008 - October 2009 (\$000's)

DESCRIPTION	D	EBIT	CREDIT	
Monthly Depreciation and Accretion			granes Etypika	
Depreciation Expense-Acct 403 (Parent- Cost of Removal) Regulatory Liability-Acct 254 Depr expense for net cost of removal on parent assets.	\$	96	\$	96
Depreciation Expense-Acct 403 (Child) Accumulated Depreciation-Acct 108 Depreciation assets.	\$	236	\$	236
Accretion Expense-Acct 411 ARO Liability-Acct 230 Record accretion expense on ARO liability.	\$	1,966	\$	1,966
Regulatory Asset-Acct 182 Regulatory Credit-Acct 407 To reverse child depr/accretion to regulatory asset (Income statement ne	\$ utral).	2,202	\$	2,202
Cash Payments				
Accumulated Depreciation-RWIP-Acct 108 Cash-Acct 131 Cash payments for cost of removal.	\$	2,376	\$	2,376
ARO Settlement Activity				
ARO Liability-Acct 230 Regulatory Asset-Acct 182 Reversal of ARO liability for settlement of obligations.	\$	1,676	\$	1,676
Accumulated Depreciation-Acct 108 (Cost of Removal) Regulatory Liability-Acct 254 Accumulated Depreciation-RWIP-Acct 108 Application of cost of removal cash against reserves.	\$ \$	837 266	\$	1,103
ARO Asset Accumulated Depreciation-Acct 108 Plant in Service-Acct 101 (ARO child cost) Retirement of ARO child assets for liabilities settled.	\$	112	\$	112

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 170

- Q-170. Please refer to page 76 of LG&E's December 31, 2008 Form 10-K. If not provided elsewhere, provide the workpapers supporting the calculation of the \$707 million (2007) and \$698 million (2006) regulatory liabilities for costs of removal.
 - a. Please provide all these workpapers and calculations in electronic format (Excel) with all formulae intact.
 - b. Provide the calculation of the cost of removal regulatory liability amounts on a plant account by plant account basis.
 - c. Provide the cost of removal regulatory liability amounts on a plant account by plant account basis attributed to Kentucky jurisdictional plant.
- A-170. LG&E did not file a 10-K for 2008. The numbers quoted above do not pertain to LG&E.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 171

- Q-171. Provide an analysis of the regulatory liability for accrued asset removal costs since inception identifying and explaining each debit and credit entry and amount. Also, provide the copies of the pages from each of LG&E's SEC Form 10Ks, Form 10Qs and Annual Reports in which SFAS No. 143 was ever mentioned, whether or not LG&E had quantified an amount of the regulatory liability at the time. Specify the exact date each of these reports was issued and released to the public.
- A-171. Please see the following table for an analysis of the regulatory liability for accrued asset removal cost since inception:

Regulatory Liability Balance 12/31/03	\$ (216,490,616)
Depreciation	(16,318,457)
Net Cost of Removal Charges	12,595,566
Regulatory Liability Balance 12/31/04	(220,213,507)
Depreciation	(16,849,489)
Net Cost of Removal Charges	7,509,011
Reclass of COR to Regulatory Liability from Life Reserves	8,260,343
FIN 47 Parent COR Transfer to FERC 254	2,424,396
Regulatory Liability Balance 12/31/05	(218,869,246)
Depreciation	(17,845,502)
Net Cost of Removal Charges	4,476,149
Regulatory Liability Balance 12/31/06	(232,238,599)
Depreciation	(17,610,294)
Net Cost of Removal Charges	8,904,588
Regulatory Liability Balance 12/31/07	(240,944,305)
Depreciation	(18,498,025)
Net Cost of Removal Charges	8,784,192
Regulatory Liability Balance 12/31/08	(250,658,138)
Depreciation	(18,420,695)
Net Cost of Removal Charges	10,206,477
Regulatory Liability Balance 10/31/09	\$ (258,872,356)

For copies of pages referencing SFAS No. 143¹ from LG&E's SEC Form 10Ks, Form 10Qs and Annual Reports, see the CD provided, in the folder titled Question No. 171. The following table specifies the date these reports were released:

<u>Document</u>	Released Date
2008 LG&E Annual Report	03/24/09
2008 KU Annual Report	03/24/09
2007 LG&E Annual Report	03/20/08
2007 KU Annual Report	03/20/08
2006 LG&E 10-K	03/21/07
2006 KU Annual Report	03/29/07
2006 LG&E and KU 10-Q, quarter ended 3/31/06	05/04/06
2005 LG&E and KU 10-K	03/30/06
2005 LG&E and KU 10-Q, quarter ended 9/30/05	11/10/05
2005 LG&E and KU 10-Q, quarter ended 6/30/05	08/12/05
2005 LG&E and KU 10-Q, quarter ended 3/31/05	05/13/05
2004 LG&E and KU 10-K	03/30/05
2003 LG&E and KU 10-K	03/30/04
2003 LG&E and KU 10-Q, quarter ended 9/30/03	11/13/03
2003 LG&E and KU 10-Q, quarter ended 6/30/03	08/13/03
2003 LG&E and KU 10-Q, quarter ended 3/31/03	05/14/03
2002 LG&E and KU 10-K	03/25/03
2002 LG&E and KU 10-Q, quarter ended 9/30/02	11/14/02
2002 LG&E and KU 10-Q, quarter ended 6/30/02	08/14/02
2002 LG&E and KU 10-Q, quarter ended 3/31/02	05/14/02
2001 LG&E and KU 10-K	03/28/02
2001 LG&E and KU 10-Q, quarter ended 3/31/01	11/14/01

¹ The guidance in SFAS No. 143 is now contained in FASB Accounting Standards Codification Topic 410, adopted effective September 30, 2009.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 172

- Q-172. Provide LG&E's projection of the annual year-end balance in the regulatory liability for cost of removal obligations for LG&E for the next 20 years. If not available for the next twenty years provide for as many years into the future that the projection is available. If this projection has not been made, please explain why not. Provide in electronic format (Excel) with all formulae intact.
 - a. For this projection assume that all of LG&E's current depreciation rates are continued in use.
 - b. Explain all other assumptions used to make this projection.
- A-172. For planning purposes, LG&E currently projects the cost of removal obligations for a ten year period. The latest projections include data through December 2019. Data past this time period is not available.
 - a. The projections presented in the table below (in thousands) use LG&E's existing depreciation rates and are based on projections made in July 2009.
 - b. Costs for the physical work associated with the removal of assets are projected for a ten year planning period. These costs are based on historical trends for normal business activities and adjusted for one-time major projects. Costs related to normal, on-going business activities are adjusted annually for inflation and labor increases, typically around 3% per annum.

Response to Question No. 172 Page 2 of 2 Charnas

Regulatory Liability projected balance 2009	\$ 262,446
Charges	(7,619)
Depreciation	22,825
Regulatory Liability projected balance 2010	277,652
Charges	(17,032)
Depreciation	23,125
Regulatory Liability projected balance 2011	283,745
Charges	(15,641)
Depreciation	23,125
Regulatory Liability projected balance 2012	291,229
Charges	(22,405)
Depreciation	23,125
Regulatory Liability projected balance 2013	291,949
Charges	(13,197)
Depreciation	23,125
Regulatory Liability projected balance 2014	301,877
Charges	(10,394)
Depreciation	23,125
Regulatory Liability projected balance 2015	314,608
Charges	(10,620)
Depreciation	23,125
Regulatory Liability projected balance 2016	327,113
Charges	(10,851)
Depreciation	23,125
Regulatory Liability projected balance 2017	339,387
Charges	(11,087)
Depreciation	23,125
Regulatory Liability projected balance 2018	351,425
Charges	(11,328)
Depreciation	23,125
Regulatory Liability projected balance 2019	\$363,222

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 173

- Q-173. For all accounts for which LG&E has collected non-legal AROs, but instead recorded a regulatory liability (regulatory liability for cost of removal), please provide the fair value of the related asset retirement cost as of December 31, 2005; December 31, 2006; December 31, 2007, December 31, 2008 and December 31, 2009. For the purposes of this question, assume that LG&E has legal AROs for these accounts, and use the life and dispersion assumptions reflected in the current depreciation rates.
- A-173. LG&E is not required under any accounting or regulatory standard to perform these hypothetical calculations. Therefore, these hypothetical calculations require original work and have not been prepared.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 174

Responding Witness: John J. Spanos

- Q-174. Provide the calculation of the annual amount of future gross salvage, cost of removal and net salvage incorporated into LG&E's existing depreciation rates. If any of the amounts are reduced by the total amount of non-legal AROs included in year-end accumulated depreciation, show that calculation.
- A-174. The attached spreadsheet sets forth the calculation of the future annual gross salvage and cost of removal incorporated in LG&E's current depreciation rates by account. None of the amounts are reduced by the amount of non-legal AROs.

	ACCOUNT	SURVIVOR CURVE		NET SALVAGE PERCENT	ORIGINAL COST	COST OF REMOVAL ACCRUAL AMOUNT	GROSS SALVAGE ACCRUAL AMOUNT
	(1)	(2)		(3)	(4)	(5)	(6)
	DEPRECIABLE PLANT						
	STEAM PRODUCTION PLANT						
311.00	STRUCTURES AND IMPROVEMENTS						
311.00	CANE RUN UNIT 1	100-S4	*	(10)	4,233,981.48	0	0
	CANE RUN UNIT 2	100-S4	٠	(10)	2,102,942 00	0	0
	CANE RUN UNIT 3	100-S4	٠	(10)	3,532,140 00	0	0
	CANE RUN UNIT 4	100-S4	*	(10)	3,819,018 36	6,216	0
	CANE RUN-SO2 UNIT 4	100-S4	٠	(10)	760,360 00	1,173	0
	CANE RUN UNIT 5	100-S4	*	(10)	6,165,918.13	15,993	0
	CANE RUN-SO2 UNIT 5	100-S4	٠	(10)	1,696,435 00	2,543	0
	CANE RUN UNIT 6	100-S4	*	(10)	19,346,501 56	40,900	0
	CANE RUN-SO2 UNIT 6	100-S4	•	(10)	1,894,852 32	3,990	0
	MILL CREEK UNIT I	100-S4	*	(10)	19,168,217.08	23,880	0
	MILL CREEK-SO2 UNIT 1	100-S4	*	(10)	1,716,995.50	2,127	0
	MILL CREEK UNIT 2	100-S4	*	(10)	10,812,787.99	13,339	0
	MILL CREEK-SO2 UNIT 2	100-S4	•	(10)	1,393,404 00	3,065	0
	MILL CREEK UNIT 3	100-S4		(10)	24,963,587 02	38,243	0
	MILL CREEK-SO2 UNIT 3	100-S4 100-S4		(10)	362,867 00	555	0
	MILL CREEK UNIT 4 MILL CREEK-SO2 UNIT 4	100-S4 100-S4		(10) (10)	60,311,484.02 5,307,313.20	87,180 7,664	0
	TRIMBLE COUNTY - UNIT 1	100-34 100-S4		(10)	160,498,043.70	388,558	0
	TRIMBLE COUNTY - SO2 UNIT 1	100-S4		(10)	511,308.94	1,243	0
	IMMBEE COUNTY - 502 CMT 1	100 57		(10)	311,300,71		
	TOTAL ACCOUNT 311 - STRUCTURES AND IMPROVEMENTS				328,598,157 30	636,670	0
312 00	BOILER PLANT EQUIPMENT						
	CANE RUN LOCOMOTIVE	25-R2		20	51,549.42	0	(629)
	CANE RUN LOCOMOTIVE - RAILCARS	25-R2		20	1,501,772.81	0	(21,045)
	CANE RUN UNIT I	45-R1.5	*	(30)	1,053,742 00	0	0
	CANE RUN UNIT 2	45-R1 5	*	(30)	132,837 00	0	0
	CANE RUN UNIT 3	45-R1.5	*	(30)	711,484 00	0	0
	CANE RUN UNIT 4	45-R1.5	*	(30)	30,277,226.79	561,204	(42,758)
	CANE RUN-SO2 UNIT 4	45-R1 5	*	(30)	17,091,727 81	293,363	(22,002)
	CANE RUN UNIT 5	45-R1.5	*	(30)	34,767,159 48	604,450	(50,635)
	CANE RUN-SO2 UNIT 5	45-R1 5	•	(30)	28,107,437 90	344,306	(34,678)
	CANE RUN UNIT 6	45-R1 5	:	(30)	47,135,674 34	554,369	(63,477)
	CANE RUN-SO2 UNIT 6	45-R1 5	•	(30) 20	32,184,156 61	398,001 0	(43,261)
	MILL CREEK-LOCOMOTIVE	25-R2 25-R2		20	613,424 43 3,593,111 63	0	(11,702) (40,534)
	MILL CREEK-LOCOMOTIVE RAILCARS	25-R2 45-R1 5		(30)	47,602,700.98	598,255	(64,099)
	MILL CREEK UNIT I MILL CREEK-SO2 UNIT I	45-R1 5		(30)	42,349,730 64	691,318	(57,610)
	MILL CREEK UNIT 2	45-R1 5	•	(30)	47,357,145 83	626,361	(63,914)
	MILL CREEK-SO2 UNIT 2	45-R1 5	*	(30)	34,424,938 00	440,644	(46,877)
	MILL CREEK UNIT 3	45-R1 5	•	(30)	137,324,677.88	1,899,266	(166,186)
	MILL CREEK-SO2 UNIT 3	45-R1.5	+	(30)	63,097,998 79	843,961	(77,733)
	MILL CREEK UNIT 4	45-R1 5	*	(30)	237,560,968 44	3,207,427	(287,846)
	MILL CREEK-SO2 UNIT 4	45-R1.5	*	(30)	113,648,645 53	1,537,045	(142,507)
	TRIMBLE COUNTY - UNIT I	45-R1 5	*	(30)	246,928,938.61	3,340,450	(309,711)
	TRIMBLE COUNTY - SO2 UNIT 1	45-R1 5	•	(30)	63,159,341.63	852,021	(77,963)
	TOTAL ACCOUNT 312 - BOILER PLANT EQUIPMENT				1,230,676,390 55	16,792,439	(1,624,539)

	ACCOUNT (1)	SURVIVOR CURVE (2)		NET SALVAGE PERCENT (3)	ORIGINAL COST (4)	COST OF REMOVAL ACCRUAL AMOUNT (5)	GROSS SALVAGE ACCRUAL AMOUNT (6)
314 00	TURBOGENERATOR UNITS						
	CANE RUN UNIT I	50-S1 5	*	(10)	106,008 99	0	0
	CANE RUN UNIT 2	50-S1 5	*	(10)	19,999 00	0	0
	CANE RUN UNIT 3	50-S1 5	*	(10)	581,177 00	0	0
	CANE RUN UNIT 4	50-S1 5	•	(10)	9,122,982 05	113,556	(3,316)
	CANE RUN UNIT 5	50-S1 5	*	(10)	7,375,364 74	23,691	(2,708)
	CANE RUN UNIT 6	50-S1 5	*	(10)	14,984,949 73	65,330	(5,681)
	MILL CREEK UNIT 1	50-S1 5 50-S1 5		(10)	14,332,084 36	41,569	(5,364)
	MILL CREEK UNIT 2 MILL CREEK UNIT 3	50-S1 5		(10) (10)	16,626,879 81 27,112,329 06	78,105	(6,248)
	MILL CREEK UNIT 4	50-S1.5		(10)	42,108,819.15	112,567 122,085	(10,233) (15,753)
	TRIMBLE COUNTY - UNIT 1	50-S1.5	*	(10)	66,954,098.52	290,719	(24,742)
	TRIMBLE COUNTY - ONTY	30-31.3		(10)	00,934,098.32	230,713	(24,742)
	TOTAL ACCOUNT 314 - TURBOGENERATOR UNITS				199,324,692 41	847,622	(74,044)
315 00	ACCESSORY ELECTRIC EQUIPMENT						
	CANE RUN UNIT I	50-S2	*	(5)	1,891,012 00	0	0
	CANE RUN UNIT 2	50-S2	*	(5)	1,277,223 00	0	0
	CANE RUN UNIT 3	50-S2	*	(5)	767,325 00	0	0
	CANE RUN UNIT 4	50-S2	*	(5)	5,474,319.06	9,209	(1,535)
	CANE RUN-SO2 UNIT 4	50-S2	*	(5)	987,949 00	796	(72)
	CANE RUN UNIT 5	50-S2	*	(5)	6,856,291 05	24,804	(1,958)
	CANE RUN-SO2 UNIT 5	50-S2	-	(5)	2,216,498 98	3,757	(198)
	CANE RUN UNIT 6	50-S2	Ī	(5)	8,571,566 71	30,228	(2,451)
	CANE RUN-SO2 UNIT 6 MILL CREEK UNIT 1	50-S2 50-S2		(5)	2,124,667 00	3,236	(190)
	MILL CREEK-SO2 UNIT 1	50-S2	٠	(5) (5)	14,425,285.62 5,541,695.00	44,648 12,357	(4,186) (1,030)
	MILL CREEK UNIT 2	50-S2	*	(5)	6,428,715.51	20,854	(1,030)
	MILL CREEK-SO2 UNIT 2	50-S2		(5)	4,505,053.40	13,753	(834)
	MILL CREEK UNIT 3	50-S2	*	(5)	13,482,711 00	31,169	(1,299)
	MILL CREEK-SO2 UNIT 3	50-S2	*	(5)	2,531,773 00	4,151	(244)
	MILL CREEK UNIT 4	50-S2	*	(5)	20,755,277 95	49,042	(1,962)
	MILL CREEK-SO2 UNIT 4	50-S2	*	(5)	5,864,978 52	14,441	(555)
	TRIMBLE COUNTY - UNIT 1	50-S2	*	(5)	56,269,846 00	126,076	(10,506)
	TRIMBLE COUNTY - SO2 UNIT 1	50-S2	*	(5)	2,736,920.00	6,132	(511)
	TOTAL ACCOUNT 315 - ACCESSORY ELECTRIC EQUIPMENT				162,709,107 80	394,655	(28,758)
316 00	MISCELLANEOUS PLANT EQUIPMENT						
	CANE RUN UNIT I	40-S2		(5)	38,746 00	0	0
	CANE RUN UNIT 3	40-S2	٠	(5)	11,665 00	0	0
	CANE RUN UNIT 4	40-S2	*	(5)	71,143 38	303	0
	CANE RUN-SO2 UNIT 4	40-S2	*	(5)	6,464 00	32	0
	CANE RUN UNIT 5	40-S2	*	(5)	80,865 51	261	0
	CANE RUN-SO2 UNIT 5	40-S2	*	(5)	47,299.00	186	0
	CANE RUN UNIT 6	40-S2	٠	(5)	2,707,943.48	8,832	0
	CANE RUN-SO2 UNIT 6	40-S2	•	(5)	31,569 00	125	0
	MILL CREEK UNIT I	40-S2	*	(5)	696,198 16	2,732	0
	MILL CREEK UNIT 2	40-S2	*	(5)	112,007 80	409	0
	MILL CREEK UNIT 3	40-S2	•	(5)	318,625.00	1,038	0
	MILL CREEK UNIT 4	40-S2	-	(5)	5,198,564 77	11,574	0
	MILL CREEK-SO2 UNIT 4	40-52	_	(5)	53,006 66	149	0
	TRIMBLE COUNTY - UNIT I	40-S2	-	(5)	2,574,446.81	5,649	0
	TOTAL ACCOUNT 316 - MISCELLANEOUS PLANT EQUIPMENT				11,948,544 57	31,290	0
	TOTAL STEAM PRODUCTION PLANT				1,933,256,892.63	18,702,675	(1,727,341)

	ACCOUNT (1)	SURVIVOR CURVE (2)	l 	NET SALVAGE PERCENT (3)	ORIGINAL COST (4)	COST OF REMOVAL ACCRUAL AMOUNT (5)	GROSS SALVAGE ACCRUAL AMOUNT (6)
	HYDROELECTRIC PRODUCTION PLANT						
331 00	STRUCTURES AND IMPROVEMENTS OHIO FALLS - NON-PROJECT OHIO FALLS - PROJECT 289	100-S2 5 100-S2 5	:	(5) (5)	65,796 14 5,412,307.69	45 542	0 0
	TOTAL ACCOUNT 331 - STRUCTURES AND IMPROVEMENTS	100-02-3		(3)	5,478,103 83	587	0
332 00	RESERVOIRS, DAMS & WATERWAY OHIO FALLS - PROJECT 289	100-S2 5	•	(5)	4,949,177.35	8,406	0
	TOTAL ACCOUNT 332 - RESERVOIRS, DAMS & WATERWAY				4,949,177.35	8,406	0
333 00	WATER WHEELS, TURBINES & GENERATORS OHIO FALLS - PROJECT 289	100-S2 5	•	(10)	2,674,579.62	534	(267)
	TOTAL ACCOUNT 333 - WATER WHEELS, TURBINES & GENERA	TORS			2,674,579 62	534	(267)
334 00	ACCESSORY ELECTRIC EQUIPMENT OHIO FALLS - PROJECT 289	80-S4	•	(5)	4,392,875.71	7,889	0
	TOTAL ACCOUNT 334 - ACCESSORY ELECTRIC EQUIPMENT				4,392,875 71	7,889	0
335 00	MISCELLANEOUS PLANT EQUIPMENT OHIO FALLS - NON-PROJECT OHIO FALLS - PROJECT 289	80-S3 80-S3	•	(10) (10)	7,813 67 171,179.25	8 8	0
	TOTAL ACCOUNT 335 - MISCELLANEOUS PLANT EQUIPMENT				178,992.92	212	0
336 00	ROADS, RAILROADS & BRIDGES OHIO FALLS - NON-PROJECT OHIO FALLS - PROJECT 289	80-S4 80-S4	•	0 0	1,133 98 178,846.99	0	0
	TOTAL ACCOUTN 336 - ROADS, RAILROADS & BRIDGES				179,980 97	0	0
	TOTAL HYDROELECTRIC PRODUCTION PLANT				17,853,710.40	17,629	(267)
	OTHER PRODUCTION PLANT						
341.00	STRUCTURES AND IMPROVEMENTS CANE RUN GT 11	55-R3	٠	(5)	68,931 71	107	0
	ZORN AND RIVER ROAD GAS TURBINE	55-R3	•	(5)	8,241 14	5	0
	PADDY'S RUN-GENERATOR 12	55-R3	*	(5)	42,864.53	16	0
	PADDY'S RUN-GENERATOR 13 BROWN COMBUSTION TURBINE #5	55-R3 55-R3	*	(5) (5)	2,158,698.12 858,538.64	3,762 1,496	0
	E W BROWN # 6	55-R3	*	(5)	105,977 86	1,496	0
	E W BROWN # 7	55-R3		(5)	144,356 29	251	0
	TRIMBLE COUNTY #5	55-R3		(5)	1,555,655 08	2,707	0
	TRIMBLE COUNTY #6	55-R3	•	(5)	1,467,923 89	2,554	0
	TRIMBLE COUNTY #7	55-R3	•	(5)	2,083,698 13	3,626	0
	TRIMBLE COUNTY #8	55-R3	•	(5)	2,075,526.50	3,611	0
	TRIMBLE COUNTY #9	55-R3	*	(5)	2,137,402.33	3,719	0
	TRIMBLE COUNTY #10	55-R3	٠	(5)	2,132,789.69	3,711	0
	TOTAL ACCOUNT 341 - STRUCTURES AND IMPROVEMENTS				14,840,603 91	25,749	0

FUTURE ANNUAL COST OF REMOVAL AND GROSS SALVAGE AS OF DECEMBER 31, 2006

	ACCOUNT	SURVIVOR CURVE		NET SALVAGE PERCENT	ORIGINAL COST	COST OF REMOVAL ACCRUAL AMOUNT	GROSS SALVAGE ACCRUAL AMOUNT
	(1)	(2)		(3)	(4)	(5)	(6)
342 00	FUEL HOLDERS, PRODUCERS AND ACCESSORIES						
	CANE RUN GT 11	50-R3	*	(5)	118,873.81	328	0
	ZORN AND RIVER ROAD GAS TURBINE	30-103	*	(5)	12,801 77	4	0
	PADDY'S RUN-GENERATOR 11	20-103		(5)	9,237 57	3	0
	PADDY'S RUN-GENERATOR 12	50-R3 50-R3		(5)	12,197 11	10	0
	PADDY'S RUN-GENERATOR 13 BROWN COMBUSTION TURBINE #5		*	(5) (5)	2,255,338 17 822,580,92	4,115 1,422	0
	E W BROWN # 6	50-R3		(5)	363,762 04	629	0
	E W BROWN # 7			(5)	102,065 03	176	0
	TRIMBLE COUNTY #5	50-R3		(5)	97,996 90	170	0
	TRIMBLE COUNTY #6	50-R3	•	(5)	97,861 58	169	0
	TRIMBLE COUNTY CT PIPELINE	50-R3		(5)	1,998,390 62	3,651	0
	TRIMBLE COUNTY #7		*	(5)	338,423 07	618	0
	TRIMBLE COUNTY #8	50-R3	*	(5)	337,096.18	616	0
	TRIMBLE COUNTY #9		*	(5)	347,146.53	634	0
	TRIMBLE COUNTY #10		*	(5)	346,397.46	633	0
					Year-and-tensor and the second		
	TOTAL ACCOUNT 342 - FUEL HOLDERS, PRODUCERS AND ACC	ESSORIES			7,260,168 76	13,177	0
343.00	PRIME MOVERS						
	PADDY'S RUN-GENERATOR 13	30-R2	*	(5)	19,700,979 24	46,095	(3,293)
	BROWN COMBUSTION TURBINE #5	30-R2	*	(5)	14,310,573.52	33,430	(2,388)
	E W BROWN # 6	30-R2	*	(5)	15,937,077.55	38,036	(2,623)
	E W BROWN # 7	30-R2	*	(5)	22,587,247 07	54,252	(3,742)
	TRIMBLE COUNTY #5	30-R2	*	(5)	12,521,829.34	29,147	(2,082)
	TRIMBLE COUNTY #6	30-R2	*	(5)	12,417,418 76	28,912	(2,065)
	TRIMBLE COUNTY #7	30-R2	*	(5)	13,328,713 85	29,390	(2,177)
	TRIMBLE COUNTY #8	30-R2	:	(5)	13,203,748.83	29,094	(2,155)
	TRIMBLE COUNTY #9	30-R2	:	(5)	13,094,377.92	28,854	(2,137)
	TRIMBLE COUNTY #10	30-R2	•	(5)	13,055,699.41	28,768	(2,131)
	TOTAL ACCOUNT 343 - ENGINES				150,157,665 49	345,978	(24,793)
344.00	GENERATORS						
	CANE RUN GT 11	60-S3	*	(5)	2,492,497.42	11,459	(996)
	ZORN AND RIVER ROAD GAS TURBINE	60-S3	*	(5)	1,827,580 88	4,757	(549)
	PADDY'S RUN-GENERATOR 11	60-S3	*	(5)	1,523,115 56	3,960	(457)
	PADDY'S RUN-GENERATOR 12	60-S3	*	(5)	2,991,745.77	7,784	(898)
	PADDY'S RUN-GENERATOR 13	60-S3	*	(5)	5,859,857 43	11,699	(1,755)
	BROWN COMBUSTION TURBINE #5	60-S3	*	(5)	3,219,204.90	6,427	(964)
	E W BROWN # 6	60-S3	*	(5)	2,417,994.54	5,058	(723)
	E W BROWN # 7	60-S3	•	(5)	2,421,079 26	5,064	(723)
	TRIMBLE COUNTY #5	60-S3	:	(5)	1,539,295 24	3,075	(461)
	TRIMBLE COUNTY #6	60-S3		(5)	1,537,167 60	3,070	(461)
	TRIMBLE COUNTY #7	60-S3	:	(5)	1,726,823 88	3,450	(518)
	TRIMBLE COUNTY #8	60-S3	:	(5)	1,717,276 72	3,431	(515)
	TRIMBLE COUNTY #9	60-S3	:	(5)	1,728,008 37	3,453	(518)
	TRIMBLE COUNTY #10	60-53	~	(5)	1,722,674.29	3,442	(516)
	TOTAL ACCOUNT 344 - GENERATORS				32,724,321.86	76,130	(10,054)

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	ACCOUNT	SURVIVOR CURVE		NET SALVAGE PERCENT	ORIGINAL COST	COST OF REMOVAL ACCRUAL AMOUNT	GROSS SALVAGE ACCRUAL AMOUNT
	(1)	(2)		(3)	(4)	(5)	(6)
345 00	ACCESSORY ELECTRIC EQUIPMENT						
343 00	CANE RUN GT 11	35-S1 5	*	0	113,683 82	0	0
	ZORN AND RIVER ROAD GAS TURBINE	35-S1 5		0	40,936 08	0	0
	PADDY'S RUN-GENERATOR 11	35-S1 5	٠	0	68,109 35	0	0
	PADDY'S RUN-GENERATOR 12	35-S1 5	*	0	114,337 63	0	0
	PADDY'S RUN-GENERATOR 13	35-S1 5		0	2,778,992 60	0	0
	BROWN COMBUSTION TURBINE #5	35-S1 5		0	2,575,301 42	0	o
	E W BROWN # 6	35-S1 5		0	942,589 47	0	0
	E W BROWN # 7	35-S1.5		0	943,792 03	0	0
	TRIMBLE COUNTY #5	35-S1.5	*	0	685,978 69	0	0
	TRIMBLE COUNTY #6	35-S1.5		0	685,031 13	Ö	0
	TRIMBLE COUNTY #7	35-S1 5		0	1,841,955 15	0	0
	TRIMBLE COUNTY #8	35-S1 5		0	1,834,731 90	0	0
	TRIMBLE COUNTY #9	35-S1 5	٠	0	1,889,431 09	0	0
	TRIMBLE COUNTY #10	35-S1 5		0	1,885,353.63	0	0
	TRIMBLE COUNTT #10	33-31 3		U	1,065,555.05		
	TOTAL ACCOUNT 345 - ACCESSORY ELECTRIC EQUIPMENT				16,400,223 99	0	0
346 00	MISCELLANEOUS PLANT EQUIPMENT						
340 00	PADDY'S RUN-GENERATOR 12	50-S3	*	0	1,140 74	0	0
	PADDY'S RUN-GENERATOR 13	50-S3	*	0	1,260,054 85	0	0
	BROWN COMBUSTION TURBINE #5	50-S3	*	0	2,370,656.38	0	0
	E W BROWN # 6	50-S3	*	0	22,455 77	0	0
	E W BROWN # 7	50-S3		0	23,047 78	0	0
	TRIMBLE COUNTY #5	50-S3	٠	0	8,937 45	0	0
	TRIMBLE COUNTY #7	50-S3		0	5,204 51	0	0
	TRIMBLE COUNTY #8	50-S3	٠	0	5,182.59	0	0
	TRIMBLE COUNTY #9	50-S3		Ö	5,328 44	0	0
	TRIMBLE COUNTY #10	50-S3	•	0	5,316.29	0	
	TOTAL ACCOUNT 346 - MISCELLANEOUS PLANT EQUIPMENT				3,707,324 80	0	0
	TOTAL OTHER PRODUCTION PLANT				225,090,308.81	461,034	(34,846)
	TRANSMISSION PLANT						
350 10	LAND AND LAND RIGHTS	50-R3		0	2,592,773 81	0	0
352 10	STRUCTURES AND IMPROVEMENTS	60-R2 5		(10)	3,426,227.89	7,881	0
353 10	STATION EQUIPMENT	55-R2.5		(10)	132,246,587 81	405,435	(43,831)
354 00	TOWERS AND FIXTURES	65-R3		(40)	24,705,991 57	103,874) o
355 00	POLES AND FIXTURES	50-R2		(50)	32,698,136 55	363,095	(52,244)
356 00	OVERHEAD CONDUCTORS AND DEVICES	50-R2		(40)	36,319,311 94	308,789	(116,524)
357 00	UNDERGROUND CONDUIT	50-R3		0	1,880,752 49	0	o
358.00	UNDERGROUND CONDUCTORS AND DEVICES	30-R3		0	5,303,988.77	0	0
	TOTAL TRANSMISSION PLANT				239,173,770.83	1,189,073	(212,599)

	ACCOUNT	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINAL COST	COST OF REMOVAL ACCRUAL AMOUNT	GROSS SALVAGE ACCRUAL AMOUNT
	(1)	(2)	(3)	(4)	(5)	(6)
	DISTRIBUTION PLANT					
361.00	STRUCTURES AND IMPROVMENTS	60-R3	(20)	6,416,608 23	10,061	0
362.00	STATION EQUIPMENT	55-R1.5	(15)	85,588,876 42	265,042	(69,416)
364 00	POLES, TOWERS, AND FIXTURES	50-R2 5	(60)	103,127,752 92	1,215,647	(146,567)
365 00	OVERHEAD CONDUCTORS AND DEVICES	45-R1.5	(50)	173,009,057 04	1,803,654	(268,629)
366.00	UNDERGOUND CONDUIT	70-R4	(10)	61,734,265 50	109,391	0
367.00	UNDERGROUND CONDUCTORS AND DEVICES	50-R2	(15)	90,008,517.11	446,352	(85,019)
368.00	LINE TRANSFORMERS	45-R1 5	(20)	107,982,342.81	706,016	0
369 10	SERVICES - UNDERGROUND	45-R1 5	(35)	3,524,148 10	36,504	0
369 20	SERVICES - OVERHEAD	45-S1 5	(100)	21,039,200 67	475,089	0
370 00	METERS	30-R2	(5)	34,382,670 04	99,130	(19,275)
373 10	STREET LIGHTING AND SIGNAL SYSTEMS - OVERHEAD	30-L1	(20)	23,772,667.59	154,251	(6,856)
373 20	STREET LIGHTING AND SIGNAL SYSTEMS - UNDERGROUND	35-R1 5	(20)	40,882,602 84	294,511	(15,339)
373 40	STREET LIGHTING AND SIGNAL SYSTEMS - TRANSFORMERS	26-R0 5	0	87,546.43	0	0
	TOTAL DISTRIBUTION PLANT			751,556,255.70	5,615,648	(611,102)
	GENERAL PLANT					
392.20	TRANSPORTATION EQUIPMENT - TRAILERS	30-S4	5	587,518 21	0	(1,662)
394 00	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	0	3,155,932.55	0	0
395.00	LABORATORY EQUIPMENT	15-SQ	0	1,503,831 33	0	0
396.20	POWER OPERATED EQUIPMENT - OTHER	30-R1 5	0	51,067.69	0	0
	TOTAL GENERAL PLANT			5,298,349.78	0	(1,662)
	TOTAL DEPRECIABLE PLANT			3,172,229,288.15	25,986,059	(2,587,817)
	NONDEPRECIABLE PLANT					
301 00	ORGANIZATION			2,240.29		
302 00	FRANCHISE AND CONSENTS			100 00		
310 10	LAND			6,303,853 30		
330 10	LAND			13 00		
340 10	LAND			49,258 87		
350 10	LAND			888,237 78		
360 10	LAND			1,984,544.32		
	TOTAL NONDEPRECIABLE PLANT			9,228,247.56		
	ACCOUNTS NOT STUDIED					
202.10	TO A NICHOLD TATION EQUIDMENT CARE AND TRUCKS			9,303,252 82		
392 10 396 10	TRANSPORTATION EQUIPMENT - CARS AND TRUCKS			2,285,136.20		
390 10	POWER OPERATED EQUIPMENT - HOURLY RATED			2,203,130,20		
	TOTAL ACCOUNTS NOT STUDIED			11,588,389.02		
	TOTAL ELECTRIC PLANT			3,193,045,924.73		

^{*} LIFE SPAN PROCEDURE IS USED CURVE SHOWN IS INTERIM SURVIVOR CURVE

LOUISVILLE GAS AND ELECTRIC GAS PLANT FUTURE ANNUAL COST OF REMOVAL AND GROSS SALVAGE AS OF DECEMBER 31, 2006

	AS OF DECE	MBER 31, 2006				
	ACCOUNT	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINAL COST	COST OF REMOVAL ACCRUAL AMOUNT	GROSS SALVAGE ACCRUAL AMOUNT
	(1)	(2)	(3)	(4)	(5)	(6)
	DEPRECIABLE PLANT					
	PRODUCTION PLANT					
350.20	RIGHTS OF WAY	55-R4	0	63,678.14	0	0
351.20	COMPRESSOR STATION STRUCTURES	50-R2.5	(5)	1,696,319 20	2,055	0
351.30	MEASURING AND REGULATING STATION STRUCTURES	55-R2.5	(5)	10,879.61	0	0
351.40 352.10	OTHER STRUCTURES STORAGE LEASEHOLDS AND RIGHTS	50-R3 65-R4	(5) 0	1,236,356.49 548,241.14	1,609 0	0
352.20	RESERVOIRS	55-R4	0	400,511.40	0	0
352.30	NONRECOVERABLE NATURAL GAS	50-SQ	0	9,648,855 00	0	0
352.40	WELL DRILLING	55-R2.5	(20)	2,622,897.61	2,376	0
352.50	WELL EQUIPMENT	50-R2.5	(20)	6,142,762.54	43,531	(2,622)
353.00	LINES COMPRESSOR STATION FOURTH FAIT	45-S1	(10)	12,786,744 73	51,571	(10,112)
354.00 355.00	COMPRESSOR STATION EQUIPMENT MEASURING AND REGULATING EQUIPMENT	50-R3 40-R1	(5) (5)	13,961,769.92 387,809.47	19,390 662	(2,424) (55)
356.00	PURIFICATION EQUIPMENT	45-R2	(15)	9,934,256.85	44,589	(4,694)
357.00	OTHER EQUIPMENT	40-R2	0	1,033,211.58	0	0
	MOTAL PROPRICTION BLANT		•	(0.474.303.(0	165 707	(10.007)
	TOTAL PRODUCTION PLANT			60,474,293.68	165,783	(19,907)
	TRANSMISSION PLANT		_			
365.20	RIGHTS OF WAY	65-S3 65-R2.5	0 (10)	220,659.05 12,673,432.30	0 9,421	0 (1,047)
367.00	MAINS	03-K2.3	(10)	12,073,432.30	9,421	(1,047)
	TOTAL TRANSMISSION PLANT			12,894,091.35	9,421	(1,047)
	DISTRIBUTION PLANT					
374.22	OTHER DISTRIBUTION LAND RIGHTS	65-S3	0	74,018 23	0	0
375.10	STRUCTURES & IMPROVEMENTS - CITY GATE STATION	55-R3	(5)	224,018.51	213	ő
375.20	STRUCTURES & IMPROVEMENTS - OTHER DISTRIBUTION	30-L1	(5)	505,354.95	2,572	0
376.00	MAINS	65-R2.5	(30)	262,334,573.57	1,715,582	(128,669)
378.00	MEASURING AND REGULATING STATION EQUIP-GENERAL	41-S0	(10)	7,853,390.14	25,972	(1,623)
379.00	MEASURING AND REGULATING STATION EQUIP-CITY GATE	45-S1	(15)	3,846,544.97	13,323	(908)
380.00 381.00	SERVICES METERS	42-S0 31-R1.5	(55) 0	125,366,090.71 21,171,719.50	1,741,977 0	0
382.00	METER INSTALLATIONS	20-L0	0	9,136,341.11	0	0
383.00	HOUSE REGULATORS	45-R3	(5)	4,598,091.61	7,875	0
384.00	HOUSE REGULATOR INSTALLATIONS	45-R2	(5)	4,707,358.65	5,960	0
385.00	MEASURING AND REGULATING STATION EQUIPMENT	40-S2.5	0	159,361.88	0	0
387.00	OTHER EQUIPMENT	40-S2	0	51,112.34	0	0
	TOTAL DISTRIBUTION PLANT			440,027,976.17	3,513,474	(131,200)
	GENERAL PLANT					
392.20	TRANSPORTATION EQUIPMENT - TRAILERS	20-L1	5	474,814.36	0	(1,757)
394.00	TOOLS, SHOP, AND GARAGE EQUIPMENT	25-SQ	0	3,474,777.85	0	0
395.00	LABORATORY EQUIPMENT	15-SQ	0	439,513.20	0	0
396.20	POWER OPERATED EQUIPMENT - OTHER	25-R1.5	5	53,369.30	0	(243)
	TOTAL GENERAL PLANT			4,442,474.71	0	(2,000)
	TOTAL DEPRECIABLE PLANT			517,838,835.91	3,688,679	(154,154)
	NONDEPRECIABLE PLANT					
302.00	FRANCHISE AND CONSENTS			1,187 49		
350 10	LAND			32,864.07		
374.11	LAND			7,586.67		
374.12	LAND			54,457.06		
	TOTAL NONDEPRECIABLE PLANT			96,095.29		
	ACCOUNTS NOT STUDIED					
392.10	TRANSPORTATION EQUIPMENT - CARS AND TRUCKS			2,912,871.76		
396.10	POWER OPERATED EQUIPMENT - HOURLY RATED			2,990,887.40		
	TOTAL ACCOUNTS NOT STUDIED			5,903,759.16		
	TOTAL GAS PLANT			523,838,690.36		

	ACCOUNT (1)	SURVIVOR CURVE (2)	NET SALVAGE PERCENT (3)	ORIGINAL COST (4)	COST OF REMOVAL ACCRUAL AMOUNT (5)	GROSS SALVAGE ACCRUAL AMOUNT (6)
	DEPRECIABLE PLANT					
	CTRUCTURES AND MARROWENES					
390.10	STRUCTURES AND IMPROVEMENTS GENERAL OFFICE	35-R2	(10)	49,324,994.87	170,518	0
390.10	TRANSPORTATION	25-R2.5	(5)	431,573.62	1,917	0
390.30	STORES	45-R3	(5)	10,929,115.62	21,094	0
390.40	SHOPS	45-R4	(5)	589,466.55	936	0
390.60	MICROWAVE	45-R3	(5)	855,652.76	1,184	0
	OFFICE FURNITURE AND EQUIPMENT				_	_
391.10	FURNITURE	20-SQ	0	12,512,975.03	0	0
391.20	EQUIPMENT	15-SQ	0	3,342,047.27	0	0
391.30	COMPUTER EQUIPMENT	5-SQ	0	19,219,230.99	0	0
391.31	PERSONAL COMPUTER	5-SQ	0	1,217,943.37	0	0
391.40	SECURITY EQUIPMENT	10-SQ	0	2,554,508.44	0	0
392.00	TRANSPORTATION EQUIPMENT - TRAILERS	27-O1	5	63,404.28	0	(172)
393.00	STORES EQUIPMENT	25-SQ	0	1,210,653.40	0	0
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	0	3,470,364 28	0	0
395.00	LABORATORY EQUIPMENT	15-SQ	0	22,281.50	0	0
396.00	POWER OPERATED EQUIPMENT - OTHER	25-S1.5	10	14,147.08	0	(78)
397.00	COMMUNICATION EQUIPMENT	15-SQ	0	36,367,603.46	0	0
397.10	COMMUNICATION EQUIPMENT - COMPUTER	15-SQ	0	5,784,754.49	0	0
398.00	MISCELLANEOUS EQUIPMENT	10-SQ	0	594,390.05	0	0
	TOTAL DEPRECIABLE PLANT			148,505,107.06	195,647	(250)
	NONDEPRECIABLE PLANT					
301.00	ORGANIZATION			83,782.29		
302.00	FRANCHISES AND CONSENTS			4,200.00		
303.00	MISCELLANEOUS INTANGIBLE PLANT			28,789,522.78		
389.10	LAND			1,711,503.17		
389.20	LAND RIGHTS			202,094.94		
	TOTAL NONDEPRECIABLE PLANT			30,791,103.18		
	ACCOUNTS NOT STUDIED					
392.10	TRANSPORTATION EQUIPMENT - CARS AND TRUCKS			132,669.00		
396.10	POWER OPERATED EQUIPMENT - TRMS			258,314.21		
570.10	. C			250,517,21		
	TOTAL ACCOUNTS NOT STUDIED			390,983.21		
	TOTAL COMMON PLANT			179,687,193.45		

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Ouestion No. 175

Responding Witness: Shannon L. Charnas

- Q-175. Are the amounts of cost of removal and gross salvage incorporated into the existing and proposed depreciation rates the same as they would have been in the absence of SFAS No. 143 and FIN 47? Please explain.
- A-175. The amounts of cost of removal and gross salvage incorporated into the existing and proposed depreciation rates are the same as they would have been in the absence of SFAS No. 143 and FIN 47.

All of the cost of removal and gross salvage recorded on the books and developed into the depreciation rates are costs associated with normal business in the utility industry.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 176

- Q-176. With respect to the Regulatory Liability relating to cost of removal obligations which LG&E reclassified out of accumulated depreciation:
 - a. Do you agree that this constitutes a regulatory liability for regulatory purposes in Kentucky? If not, please explain why not.
 - b. Do you agree that this amount is a refundable obligation to ratepayers until it is spent on its intended purpose (cost of removal)? If not, why not?
 - c. Please explain the repayment provisions associated with this regulatory liability.
 - d. Please explain when you expect to spend this money for cost of removal.
 - e. Please explain what you have done with this money as you have collected it. If you say that you have spent it on plant additions, please provide documentation.
 - f. Identify and explain all other similar examples of LG&E's advance collections of estimated future costs for which it does not have a legal obligation.
 - g. Does LG&E agree that the PSC will never know whether or not LG&E will actually spend all of this money for cost of removal until and if LG&E goes out of business? If not, why not?
 - h. Does LG&E believe that amounts recoded in accumulated depreciation represent capital recovery? If not, why not?
 - i. Whose capital is reflected in accumulated depreciation shareholders' or ratepayers'?

- A-176. a. No. The regulatory liability relating to cost of removal does not constitute a regulatory liability for regulatory purposes in Kentucky. These amounts were reclassified out of accumulated depreciation for external reporting purposes under U.S. generally accepted accounting principles. In FERC Order 631 (Docket No. RM02-7-000), which addresses retirement obligations, the FERC stated, "Under the existing requirements of the Uniform System of Accounts removal costs that are not asset retirement obligations are included as a component of the depreciation expense and recorded as accumulated depreciation." Therefore, this amount is not a regulatory liability for regulatory purposes in Kentucky.
 - b. No. The amount was collected based upon Commission approved depreciation rates which were designed to recover the cost of removing assets in the future from the ratepayers that benefit from those assets. Also, for regulatory purposes in Kentucky it is a component of depreciation expense and is recorded in accumulated depreciation, not as a regulatory liability.
 - c. There are no repayment provisions for this since it is not a regulatory liability for regulatory purposes in Kentucky.
 - d. The money is spent as assets are removed, either by replacement or retirement.
 - e. Amounts collected for cost of removal are recorded based on depreciation rates approved by the Commission. Since these rates have gone into the calculation of base rates charged to the customers, it is theoretically being collected from the customers along with all other costs and is not separately tracked. As with all other amounts collected from the customer, it has been used in the operations of the Company.
 - f. Cost of removal is recognized as a current period cost in accumulated depreciation to address generational inequities that might otherwise arise due to the long lives of utility assets.
 - g. No. The cost of removal component of depreciation rates is adjusted, if necessary, when periodic depreciation studies are completed. The Commission may periodically require depreciation studies to ensure the costs included in the approved depreciation rates are appropriately aligned with the expected lives of the assets and the costs to ultimately remove those assets. The FERC also requires separate records for cost of removal for non-legal asset retirement obligations recorded in accumulated depreciation per the Uniform System of Accounts and Order No. 631. These detailed records will allow the cost of removal expenditures to be monitored.

- h. No. Accumulated depreciation is the net of accrued depreciation, retirements, net salvage proceeds and accrued cost of removal for retirements. Accrued depreciation is a systematic allocation of the cost of assets over their useful lives and therefore conceptually represents recovery of the costs of those assets to the extent depreciation expense is included in the rates charged to the ratepayers.
- i. Accumulated depreciation represents the reduction of the carrying amount of assets owned by the Company and used to provide services to the ratepayers; therefore it reflects the recovery of shareholder's capital.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 177

Responding Witness: Shannon L. Charnas/Counsel

- Q-177. Does LG&E commit to remove each asset for which it is collecting cost of removal and does it commit to spend all of the money it is collecting for cost of removal, on cost of removal? If the answer is yes, explain why LG&E does not have legal AROs under the principal of promissory estoppel. Please explain.
- A-177. The Attorney General misinterprets the concept of promissory estoppel in his questions and the Company, therefore, cannot provide a meaningful answer to the question.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 178

Responding Witness: Shannon L. Charnas

- Q-178. Does LG&E consider that it is bound by SEC regulations to record accruals for future costs of removal as regulatory liabilities?
 - a. If so, please provide a record of those accruals in as much account detail as is available along with the workpapers used to develop those accruals.
 - b. If not, please explain why not.
 - c. State whether the Company proposes to separate retirement cost accounting from depreciation accounting, with separate rates and reserves. If the Company does not propose such separation, please state fully the reasons for not doing so.
- A-178. LG&E has deregistered from the SEC and is not bound by SEC regulations.

LG&E does record cost of removal as a regulatory liability for GAAP reporting. This is in compliance with SFAS No. 143, FIN 47 and the general principles of SFAS No. 71, Accounting for Effects of Certain Types of Regulation.

- a. See response to Question No. 171.
- b. See the answer above.
- c. The Company currently maintains separate rates and reserves for cost of removal and capital recovery.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 179

Responding Witness: Shannon L. Charnas

- Q-179. Please identify and describe the level of detail, e.g. by account, functional category, at which the Company computes the depreciation expense for purposes of financial reporting, Commission reporting, and ratemaking. Explain fully any differences among these three depreciation calculations.
- A-179. There are no differences made in computing depreciation expense for financial reporting, Commission reporting, and ratemaking. Depreciation expense is calculated at the plant account level for transmission, distribution, and general plant. Depreciation expense for generation plant is calculated by plant account for each generation unit location.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 180

Responding Witness: Shannon L. Charnas

- Q-180. State whether the Company has forecast any non-legal removal costs that it does not regard as regulatory liabilities. Please describe these costs in detail, state fully the reason(s) for your belief that such forecast costs are not regulatory liabilities, and identify the forecast amounts of such removal costs in as much detail as is available. Provide the supporting documentation for each forecast amount.
- A-180. The Company has not forecast any non-legal removal costs that it does not regard as regulatory liabilities.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Ouestion No. 181

- Q-181. Please provide copies of all presentations made to rating agencies and/or investment firms by LG&E between January 1, 2009 and the present.
- A-181. Objections are made to the request for the production of documents on the grounds that it seeks the production of documents that are irrelevant to the issues in this case and relate to non-utility activities or hypothetical scenarios based upon projections. Such projections are only estimates; there is no guarantee that such projections will be realized; and the estimates are based on a number of assumptions that may change over time. These non-utility activities and projected information are not relevant to the analysis of known and measurable pro forma adjustments in this case. Without waiver of these objections, the Company provides the documents in the attached CD in folder titled Question No. 181 under seal and pursuant to a petition for confidential treatment.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 182

- Q-182. Please provide copies of all prospectuses for any security issuances by E.ON AG, E.ON. U.S. LLC, and LG&E since January 1, 2009.
- A-182. There have been no security issuances by LG&E or E.ON U.S. LLC since January 1, 2009. E.ON U.S. LLC personnel are not involved in the financing activities of E.ON AG and do not maintain files with the E.ON AG prospectuses.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 183

- Q-183. Please provide copies of all studies performed by LG&E or by consultants or investment firms hired by LG&E to assess (1) LG&E financial performance, (2) the performance of LG&E relative to other utilities, or (3) the adequacy of LG&E's return on equity or overall rate of return.
- A-183. See the reports on the attached CD in folder titled Question No. 183.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 184

- Q-184. Please provide copies of credit reports for E.ON AG, E.ON. U.S. LLC, and LG&E from the major credit rating agencies published since January 1, 2008.
- A-184. The requested rating reports issued since January 1, 2007 are attached on CD in folder titled Question No. 184.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 185

- Q-185. Please provide copies of all correspondence between E.ON AG, E.ON. U.S. LLC, and LG&E and any of the three major bond rating agencies (S&P, Moody's, and Fitch) from January 1, 2008 to the present. These include copies of letters, reports, presentations, emails, and notes from telephone conversations.
- A-185. Objections are made to the request for the production of documents on the ground that it is overly broad and unduly burdensome and seeks the production of documents that are irrelevant to the issues in this case and documents that relate to hypothetical scenarios. Without waiver of these objections, the Company states as follows: KU, LG&E and E.ON U.S. do not have in their possession correspondence between E.ON AG and the bond rating agencies. Employees of KU, LGE or E.ON U.S. do not participate in the ratings of E.ON AG by credit rating agencies. Please see the documents, produced in electronic format, on the attached CD in folder titled Question No. 185 that have been identified within the time permitted for this response and that are responsive to the request. Please note that the Companies are seeking confidential protection the documents being provided hereunder pursuant to a petition for confidential protection.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 186

- Q-186. Please provide the breakdown in the expected return on pension plan assets. Specifically, please provide the expected return on different asset classes (bonds, US stocks, international stocks, etc.) used in determining the expected return on plan assets. Please provide all associated source documents and workpapers.
- A-186. LG&E uses return assumptions provided by Mercer on an annual basis in determining the expected return on pension plan assets. Attached are the return assumptions received from Mercer that were used for year- end reporting for 2009, along with the calculation of the expected return for the LG&E pension plan assets using the Mercer data.

Pension Plan Expected Return Calculation

	Target Allocation	Expected Return*
Domestic Equity	44.4%	9.9%
International Equity	<u>13.1%</u>	<u>9.7%</u>
Total Equity	57.5%	9.85%
Aggregate Fixed Income	26.8%	4.8%
Long Duration	<u>15.7%</u>	<u>5.4%</u>
Total Fixed Income	42.5%	5.02%
Total	100.0%	7.80%

^{*}Expected Returns provided by Mercer on 1/11/2010.

	Mean-Var	iance Assi	Mean-Variance Assumptions:	PARTY TO				では、		Factor Scores	Ser.	· 一种 · · · · · · · · · · · · · · · · · ·			
	20-Yr. Ass	20-Yr Assumptions		Shorter Ge	orter Geometric Returns	Returns.			Equil	Equity				E	lug:
Asset Class	* GRR	12.00	STD	1-Yr	-Yr === 2-Yr	3-Yr	5-Yr	10Yr	Return	Beta	Dur x	Liq	Inc	Costs	Hedg
Domestic Equity															
All Cap	8.4%	%6.6	18.6%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	-	0	9.3	2.1	30	ιΩ
Large Cap	8.2%	89.6	18.0%	8.2%	8.2%	8.2%	8.2%	8.2%	8.2%	0.94	0	9.5	2.5	25	ω
Mid Cap	8.4%	10.4%	21.1%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	1.05	0	9.2	7.5	30	3
Small Cap	8.5%	11.0%	24.0%	8.5%	8.5%	8.5%	8.5%	8.5%	8.5%	1.15	0	6	1.2	20	z,
Micro Cap	8.9%	12.4%	28.8%	8.9%	8.9%	8.9%	8.9%	8.9%	8.9%	1.25	0	8.5	0.5	70	τ.
Smid Cap	8.4%	10.5%	21.7%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	1.09	0	9.1	1.4	40	5
International Equity															
Dvlpd Mkts-Unh	8.2%	9.7%	18.6%	8.2%	8.2%	8.2%	8.2%	8.2%	8.2%	-	0	თ	2.7	20	J.
Dvlpd Mkts Hgd	8.2%	9.5%	17.2%	8.2%	8.2%	8.2%	8.2%	8.2%	8.2%	-	0	თ	2.7	20	rc
Emerging Mkts	8.4%	11.3%	26.0%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	1.15	0	8.3	2	75	'n
Intl Small Cap	8.4%	11.1%	25.0%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	1.15	0	8.7	1.5	09	ς.
World x-U.S.	8.4%	9.9%	18.4%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	-	0	8.8	2.5	55	S.
Global Equity	8.4%	9.7%	16.9%	8.4%	8.4%	8.4%	8.4%	8.4%	8.4%	-	0	8.9	2.2	55	ιΩ
Global Small Cap	8.6%	10.7%	21.7%	8.6%	8.6%	8.6%	8.6%	8.6%	8.6%	1.17	0	8.3	1.2	75	ഹ
Domestic Fixed Income															
Gov/Corp	4.6%	4.8%	%0.9	%6.0	0.7%	1.2%	2.3%	3.5%	5.3%	0.1	5.3	9.4	4.6	30	2
Aggregate	4.7%	4.8%	5.5%	1.0%	0.8%	1.3%	2.4%	3.6%	5.4%	0.1	4.4	9.3	5	35	2
Short G/C	4.2%	4.2%	3.0%	0.2%	0.4%	1.2%	2.2%	3.4%	4.4%	0	1.9	9.5	3.7	20	5.5
Intermediate G/C	4.5%	4.6%	4.5%	0.2%	0.4%	1.1%	2.1%	3.4%	2.0%	0	3.9	9.4	4.3	30	4
Long G/C	4.8%	5.4%	11.0%	0.3%	1.4%	1.6%	2.0%	3.5%	2.9%	0.1	12.2	9.5	6.1	25	2
Very Long Bonds	4.7%	6.2%	18.0%	-0.1%	1.5%	3.2%	2.5%	3.6%	5.2%	0	20	9.6	4.9	20	
Government	3.8%	4.0%	6.5%	-0.1%	%0.0	%9.0	1.4%	2.8%	4.6%	0	4.7	6.6	3.6	10	2
Corporate/Credit	5.3%	5.5%	6.5%	0.5%	1.4%	2.0%	2.9%	4.0%	%0.9	0.2	6.3	б	8.9	20	က
Long Government	3.6%	4.2%	11.5%	%0.0	0.5%	0.8%	1.3%	2.7%	5.1%	0	12.4	6.6	4.7	10	
Intrmd Credit	4.8%	4.9%	5.2%	0.5%	1.1%	1.8%	2.7%	3.9%	5.4%	0.2	4.4	8.9	6.1	20	4
Long Credit	5.7%	6.3%	11.5%	0.8%	2.3%	2.6%	3.2%	4.2%	6.5%	0.2	12	8.9	7.7	90	m
Mortgage-Backed	4.4%	4.6%	6.3%	4.2%	4.2%	4.3%	5.2%	5.3%	%0.9	0	3.1	8.8	5.3	09	ю
High Yield	6.4%	6.9%	10.0%	7,1%	7.0%	6.9%	6.8%	6.7%	6.3%	0.5	4.3	7	0	120	ဖ
Muni Bonds	4.2%	4.5%	8.3%	4.2%	4.2%	4.2%	4.2%	4.2%	4.3%	0	5.7	7	5.4	120	က
Infl Indexed Bonds	4.5%	4.6%	4.5%	0.4%	0.8%	1.3%	2.1%	3.3%	4.8%	0	2.4	9.6	3.4	20	æ
Intermediate IIBs	4.2%	4.2%	3.0%	0.2%	0.3%	%6.0	1.8%	3.1%	4.6%	0	1.8	9.5	က	25	œ
Long IIBs	4.9%	5.1%	7.0%	0.5%	1.7%	2.0%	2.6%	3.6%	2.0%	0	8.4	9.5	ო	25	æ
Cash	3.4%	3.4%	1.3%	0.2%	0.7%	1.2%	2.0%	2.9%	3.8%	0	0.1	10	-	4	9

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 187

Responding Witness: S. Bradford Rives

- Q-187. Please provide LG&E's authorized and earned return on common equity for electric and gas operations over the past five years. Please show the figures used in calculating the earned return on common equity for each year, including all adjustments to net income and/or common equity. Please provide copies of all associated workpapers and source documents. Please provide copies of the source documents, workpapers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-187. Please see the response to KPSC-1 Question No. 38. The electronic version is provided on the attached CD in the folder titled Question No. 187.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 188

Responding Witness: Valerie L. Scott

- Q-188. Please provide copies of the financial statements (balance sheet, income statement, statement of cash flows, and the notes to the financial statements) for LG&E, E.ON U.S. LLC, and E.ON AG for the past 2007 and 2008. Please include 2009 financial statements when they become available. Please provide copies of the financial statements in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-188. See attached CD in folder titled Question No. 188 for copies of LG&E, E.ON U.S. LLC, and E.ON AG financial statements for 2007 and 2008, as requested. The E.ON AG 2009 financial statements are also included. The LG&E and E.ON U.S. LLC 2009 financial statements will be provided once they are available.

Because the attachments are voluminous, the Company is not providing a hard copy of this information to the Attorney General only.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 189

Responding Witness: Daniel K. Arbough

Q-189. For the past two years, please provide the dates and amount of: (1) cash dividend payments made by LG&E to E.ON. U.S. LLC; and (2) cash equity infusions made by E.ON. U.S. LLC into LG&E.

A-189. (1) Cash Dividends – 3/20/08 \$40,000,000 3/27/09 \$35,000,000 6/30/09 \$45,000,000

(2) Equity Infusion – 12/26/08 \$20,000,000

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 190

- Q-190. Please provide copies of the workpapers used by Dr. Avera in preparing his testimony and schedules.
- A-190. See attached CD in folder titled Question No. 190.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 191

- Q-191. Please provide copies of the publications cited in the testimony.
- A-191. Please refer to the response to Question No. 190.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 192

- Q-192. With reference to page 25, lines 1-12, please: (1) indicate the justification for each of the screens applied to the electric utilities in the Value Line Investment Survey; (2) the companies eliminated from the group from each of the screens; and (3) the values or reasons that each of the companies was eliminated.
- A-192. 1) As explained in Dr. Avera's testimony, the purpose of the proxy group criteria was to identify risk-comparable utilities for purposes of estimating a fair ROE. Dr. Avera's testimony also noted that the risk indicators used to screen the electric utilities followed by Value Line are objective, widelyreported measures that are likely to reflect the perceptions of investors. Given the similarities in risks between KU and its sister utility, LG&E, and the fact that LG&E is also engaged in gas utility operations, Dr. Avera restricted his Utility Proxy Group to companies with both electric and gas utility operations. Meanwhile, analogous to the comparable risk band applied by FERC, the range of S&P corporate credit ratings fell on notch lower and higher than KU's "BBB+" rating. As noted in Dr. Avera's testimony, the Value Line Safety Rank and Financial Strength Ratings used to identify the Utility Proxy Group are synonymous with a conservative risk profile and supported a conclusion that the Utility Proxy Group provides a sound basis to estimate the cost of equity for LG&E. Finally, a requirement that each proxy firm has at least two alternative earnings per share growth projections better ensures that the resulting DCF cost of equity estimates will not be erroneous.
 - 2) Please refer to WEA WP-58 provided in response to Question No. 190.
 - 3) Please refer to WEA WP-58 provided in response to Question No. 190.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 193

- Q-193. With reference to page 26, lines 7-14, please: (1) list the screens applied to the *Value Line* database in establishing the Non-Utility Proxy Group; (2) indicate the justification for each of the screens applied to the companies in the *Value Line Investment Survey* in establishing the Non-Utility Proxy Group; (3) the companies eliminated from the group from each of the four screens; (4) the reasons that each of the companies were eliminated; and (5) the companies eliminated by the requirement of at least two published growth rates estimates.
- A-193. 1) Please refer to Dr. Avera's testimony at page 26 for a list of the criteria used to define the Non-Utility Proxy Group.
 - 2) As explained in Dr. Avera's testimony, the purpose of the proxy group criteria was to identify risk-comparable utilities for purposes of estimating a fair ROE. Dr. Avera's testimony also noted that the risk indicators used to screen the companies included in the Non-Utility Proxy Group are objective, widely-reported measures that are likely to reflect the perceptions of investors. Moreover, while any differences in investment risk attributable to regulation should already be reflected in these objective measures, Dr. Avera's analyses nevertheless conservatively focus on a lower-risk group of non-utility firms.
 - 3) Dr. Avera applied the dividend yield, Safety Rank, and Financial Strength criteria to the 1,500-plus firms covered by Value Line using Value Line's interactive, internet-based proprietary stock screening program. As a result, he does not have a list of the firms that did not meet these selection criteria. Additional information regarding firms excluded from the Non-Utility Proxy Group is provided in WEA WP-58 provided in response to Question 190.
 - 4) Please refer to the response to subpart (3), above.
 - 5) While a requirement that each proxy firm has at least two alternative earnings per share growth projections better ensures that the resulting DCF cost of equity estimates will not be erroneous, no companies were eliminated from the Non-Utility Proxy Group based on this criterion.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 194

- Q-194. With reference to page 28, lines 1-3, please provide the individual data for the companies in the proxy group which were used to assess the riskiness of the proxy group relative to LG&E.
- A-194. Please refer to WEA WP-58 provided in response to Question No. 190.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 195

- Q-195. With reference to page 28, lines 1-18, Please provide copies of all empirical studies performed that compare the business, financial, and investment risk of LG&E: (1) the utility group; and (2) the non-utility group.
- A-195. Dr. Avera performed no empirical studies to compare the investment risk of LG&E. Rather as explained in Dr. Avera's testimony, his evaluation of overall investment risks was based on the objective, published risk indicators discussed in his testimony. Because these widely referenced indicators reflect the overall risk evaluation of the investment community, they provide a direct guide to the likely perceptions of investors.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Ouestion No. 196

- Q-196. With reference to page 39, lines 6-21, please provide copies of FERC orders that specify its 'test of economic logic' as it relates to low DCF estimates.
- A-196. Copies of the FERC Orders referenced on page 39 in Dr. Avera's testimony are provided in response to KPSC-2 Question No. 62 on CD in the folder titled Question No. 62, referenced as Attachment 1 and Attachment 2.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 197

- Q-197. With reference to page 40, Table WEA-3, please provide copies of all source documents, workpapers, and data used in the construction of Table WEA-3. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
- A-197. Please refer to the response to Question No. 190.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 198

- Q-198. With reference to page 41, lines 4-14, and Schedule WEA-2, please provide: (1) the data, methodology, calculations, and workpapers used to eliminate the low and high DCF cost of estimates; and (2) the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
- A-198. The logic underlying Dr. Avera's evaluation of low and high-end outliers was fully articulated in his testimony, with supporting information being provided in response to Question No. 190. Copies of the pages referenced by Dr. Avera in support of his evaluation of low and high-end DCF cost of equity estimates are provided in response to KPSC-2 Question No. 62 and Question No. 63.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 199

- Q-199. With reference to page 43, lines 4-23, and Schedule WEA-6, please provide copies of all source documents, workpapers, and data used in the DCF analysis applied to the S&P 500. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
- A-199. The data and calculations underlying Dr. Avera's application of the DCF model to the dividend paying firms is contained in WEA WP-58 provided in response to Question No. 190. Because the underlying data was obtained interactively, Dr. Avera does not have any hard copy documents supporting this analysis.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 200

- Q-200. With reference to pages 47-49 and Schedule WEA-8, please (1) list all regulatory cases (by name, docket number, and filing date) in which Dr. Avera has provided rate of return testimony and employed his Expected Earnings Approach to estimating the cost of equity capital, (2) indicate all cases (by name, docket number, and date), other than those cited, in which a regulatory commission has explicitly adopted Dr. Avera's Expected Earnings Approach to estimating the cost of equity capital in arriving at an overall rate of return, and (3) provide copies of the 'Rate of Return' section of the Commission's decisions for all cases in which a regulatory commission has adopted the Dr. Avera's Expected Earnings Approach.
- A-200. 1) Dr. Avera has testified in over 300 regulatory proceedings and he does not maintain a database to track the details underlying the methods used in each separate proceeding. Nevertheless, Dr. Avera has consistently considered expected earned rates of return as a guide to investors' requirements.
 - 2) Dr. Avera does not maintain a database detailing the specific findings in each and every case in which he has testified, nor has he conducted such a review for purposes of his testimony in this proceeding.
 - 3) Dr. Avera does not routinely compile copies of the regulatory decisions issued in cases in which he has submitted testimony, nor has he conducted such research for purposes of his testimony in this proceeding.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Ouestion No. 201

Responding Witness: William E. Avera/Daniel K. Arbough

- Q-201. With reference to pages 48-51, please provide: (1) copies of all data, workpapers, and source documents used in the development of the flotation cost adjustment for LG&E; and (2) document all equity flotation costs associated with financings by LG&E in the past three years.
- A-201. 1) The sources for the flotation cost percentages detailed in Dr. Avera's testimony were included in his workpapers provided in response to Question No. 190.
 - 2) There have been no flotation costs in the last three years as all equity increases were in the form of contributions from the parent company.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 202

- Q-202. With reference to pages 54-60, and Exhibit WEA-10, please provide copies of all source documents, workpapers, and data used in the capital structure analysis. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact.
- A-202. Please refer to the response to Question No. 190. Underlying data was taken from Form 10-K Reports, which are publicly available at http://www.sec.gov/edgar/searchedgar/companysearch.html.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 203

- Q-203. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-2. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-203. Please refer to the response to Question No. 190.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 204

- Q-204. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-3. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-204. Please refer to the response to Question No. 190.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 205

- Q-205. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-4. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-205. Please refer to the response to Question No. 190.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 206

- Q-206. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-5. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-206. Please refer to the response to Question No. 190.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Ouestion No. 207

- Q-207. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-6. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-207. Please refer to the response to Question Nos. 190 and 199.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 208

- Q-208. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-7. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-208. Please refer to the response to Question Nos. 190 and 199.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 209

- Q-209. Please provide: (1) copies of the source documents, workpapers, and underlying data used in Exhibit WEA-8; (2) please provide an expected earnings analysis for the non-utility proxy group, and explain why such an analysis was not presented in Exhibit WEA-8; and (3) the data and workpapers used in (1) and (2) in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-209. 1) Please refer to the response to Question No. 190.
 - 2) Unlike regulated utilities, the earnings of firms in the non-regulated sector of the economy are not directly related to the book value of their investment. As a result, earned rates of return calculated on book value equity are unlikely to be representative of investors' required rate of return and Dr. Avera did not apply the expected earnings approach to the firms in the Non-Utility Proxy Group. The data necessary to apply the expected earnings approach to the firms in the Non-Utility Proxy Group is provided in response to Question No. 190.
 - 3) Please refer to the response to subparts (1) and (2), above.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 210

- Q-210. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-9. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-210. Please refer to the response to Question No. 190.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 211

- Q-211. Please provide copies of the source documents, workpapers, and underlying data used in the development of Exhibit WEA-10. Please provide the data and workpapers in both hard copy and electronic formats (Microsoft Excel), with all data and formulas intact. Please also include electronic copies (Microsoft Excel) of the Exhibit, leaving all data and formulas intact.
- A-211. Please refer to the response to Question No. 190.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 212

Responding Witness: S. Bradford Rives

- Q-212. With reference to Exhibit 2, page 1 of 2, please provide copies of the data, source documents, and workpapers used to develop the capital structure for the electric and gas operations of the company in Exhibit 2. Please provide copies of the source documents, workpapers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-212. See the response to KIUC-1 Question No. 21.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 213

Responding Witness: S. Bradford Rives

- Q-213. With reference to Exhibit 2, page 2 of 2, please provide copies of the data, source documents, and workpapers used to develop the adjustments to the capital structure for the electric and gas operations of the company in Exhibit 2. Please provide copies of the source documents, workpapers, and data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-213. See the response to KIUC-1 Question No. 21.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 214

Responding Witness: Daniel K. Arbough

- Q-214. With reference to Exhibit 2, page 1 of 2, please provide the quarterly capitalization amounts and ratios, including and excluding short-term debt, for the past three years for LG&E (2007-2009). Please provide the data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-214. See attached CD in the folder titled Question No. 214.

Louisville Gas and Electric Company Case No. 2009-00549

Attorney General Question No. 214

Responding Witness: Daniel K Arbough

"000 Omitted"

2008	Ratio	.,	8.53%	0.00%	52.77%	100.00%
June 30, 2008	Amount	43.09% \$ 853,104	188,104	•	1,163,475	2,204,683
	0		4.93%	0.00%	51.98% 1,163,475	100.00% \$
March 31, 2008		44.26% \$ 944,304	108,086	ı	1,138,880	2,191,270
1, 2007	Ratio		3.52%	0.00%	52.22%	100.00% \$
December 3	Amount	43.21% \$ 984,304	78,241	•	1,161,164	2,223,709
0, 2007	Ratio	43.21% \$	4.87%	0.00%	51.92%	100.00% \$
September 30, 2007 December 31, 2007	Amount Ratio Amount Ratio Amount	44.42% \$ 937,304	105,533	,	1,126,335	2,169,172
une 30, 2007	Ratio	44.42% \$	4.13%	0.00%	51.45%	100.00% \$
June 30, 2	Ratio Amount Ratio	937,304	87,186		1,085,399	2,109,889
2007	Ratio	40.89% \$	1.20%	3.51%	54.40%	100.00%
March 31, 2007	Amount	\$ 819,304 40.89% \$ 937,304	24,117	70,425	1,089,832	\$ 2,003,678
	ine No. Type of Capital	Long-Term Debt		Preferred Stock	Common Equity	Total Capitalization \$ 2,003,678 100.00% \$ 2,109,889 100.00% \$ 2,169,172 100.00% \$ 2,223,709 100.00% \$ 2,191,270 100.00% \$ 2,204,683 100.00%
	Line No.	-	2	ю	4	'n

,	,	September 3	September 30, 2008 December 31, 2008	December 3	1, 2008	March 31, 2009	, 2009	June 30, 2009	5009		September 30, 2009	December 31, 2009	1, 2009
ine No. Type of Capital Amount Ratio	Amount Ratio /	Ratio	~	Amount	Ratio	Amount	Ratio	Amount	Ratio		Ratio	Amount	Ratio
			1										
Long-Term Debt \$ 750,104 32.74% \$ 896,104	\$ 750,104 32.74% \$ 8	32.74% \$ 8	∞		38.09% \$	\$ 896,104	39.84%	\$ 896,104	40.13% \$	\$ 896,104	39.34% \$	\$ 896,104	38.64%
	344,663 15.04% 221	15.04% 221	221		9.44%	147,622	6.56%	152,601	6.83%	149,360	6.56%	170,400	7.35%
Preferred Stock - 0.00%	- 0.00%	0.00%		ı	0.00%	•	0.00%	ı	0.00%	1	0.00%	•	0.00%
Common Equity 1,196,165 52.22% 1,234	1,196,165 52.22% 1,234	52.22% 1,234	1,234	,461	52.47%	1,205,310	53.60%	1,184,107	53.04%	1,232,418	54.10%	1,252,740	54.01%
Total Capitalization \$ 2,290,932 100.00% \$ 2,352,564 100.00% \$ 2,249,036 100.00% \$ 2,232,812 100.00% \$ 2,277,882 100.00% \$ 2,319,244 100.00%	\$ 2,290,932 100.00% \$ 2,352	100.00% \$ 2,352	2,352	,564	100.00%	3,2,249,036	100.00%	\$ 2,232,812	100.00%	\$ 2,277,882	100.00%	\$ 2,319,244	100.00%

Note 1: Total long-term debt includes the short-term portion of long-term debt. Note 2: The above amounts do not include imputed debt from the purchased power agreements.

Louisville Gas and Electric Company Case No. 2009-00549

Attorney General Question No. 214

Responding Witness: Daniel K Arbough

"000 Omitted"

8002	Ratio		0.00%	0.00%	57.70%	100.00%
June 30, 2008	Amount	45.33% \$ 853,104	•	•	1,163,475	2,016,579
2008	Ratio		%00.0	0.00%	54.67%	100.00%
March 31, 2008	Amonnt	45.88% \$ 944,304	•	•	1,138,880	2,083,184
1, 2007	Ratio		0.00%	0.00%	54.12%	100.00% \$
December 3	Amount	45.42% \$ 984,304	•	•	1,161,164	2,145,468
0, 2007	Ratio	45.42% \$	0.00%	0.00%	54.58%	100.00% \$
September 30, 2007 December 31, 2007	Amount	46.34% \$ 937,304	ı	ı	1,126,335	2,063,639
2007	Ratio	46.34%	0.00%	0.00%	53.66%	100.00% \$
June 30, 2007	Amount Ratio	937,304	•	•	1,085,399	2,022,703
2007	Ratio A	41.39% \$	0.00%	3.56%	55.05%	100.00%
March 31, 2007	Amount	\$ 819,304 41.39% \$ 937,304	•	70,425	1,089,832	\$ 1,979,561
	Line No. Type of Capital	Long-Term Debt	Short-Term Debt	Preferred Stock	Common Equity	Total Capitalization \$ 1,979,561 100.00% \$ 2,022,703 100.00% \$ 2,063,639 100.00% \$ 2,145,468 100.00% \$ 2,083,184 100.00% \$ 2,016,579 100.00%
	Line No.		7	33	4	, N

, 2009	Ratio	41.70%	0.00%	0.00%	58.30%	100.00%
December 31, 2009	Amount	896,104	ı		1,252,740	2,148,844
	Ratio ,	42.10% \$ 896,104	0.00%	0.00%	57.90%	100.00% \$ 2,101,414 100.00% \$ 2,080,211 100.00% \$ 2,128,522 100.00% \$ 2,148,844 100.00%
September 30, 2009	Amount	896,104	1	•	1,232,418	2,128,522
	Ratio	43.08% \$ 896,104	0.00%	%00.0	56.92%	100.00% \$
June 30, 2009	Amount	42.64% \$ 896,104	1	•	1,184,107	2,080,211
6002	Ratio		%00.0	0.00%	57.36%	\$ %00.001
March 31, 2009	Amount	42.06% \$ 896,104			1,205,310	2,101,414
, 2008	Ratio	42.06% \$	0.00%	0.00%	57.94%	\$ %00.001
December 31	Amount	896,104	•		1,234,461	2,130,565
), 2008 I	Ratio	38.54% \$	%00.0	%00.0	61.46%	\$ %00.001
September 30, 2008 December 31, 2008	Amount	\$ 750,104 38.54% \$ 896,104	•	•	1,196,165	\$ 1,946,269
	ine No. Type of Capital	Long-Term Debt	Short-Term Debt	Preferred Stock	Common Equity	Total Capitalization \$ 1,946,269 100.00% \$ 2,130,565
	Line No.	_	2	3	4	,

Note 1: Total long-term debt includes the short-term portion of long-term debt.

Note 2: The above amounts do not include imputed debt from the purchased power agreements.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 215

Responding Witness: Daniel K. Arbough

- Q-215. With reference to pages Exhibit 2, Column 10, please provide (1) all data, workpapers, source documents, and calculations used in computing the short-term and long-term cost rates; (2) all details (issue date, debt amounts, underwriter, underwriting spread, SEC filings, etc.) associated with all financings used in determining the Company's short-term and long-term debt cost rates; and (3) the methodology, computations, and associated workpapers used to compute the short-term debt cost rate and intercompany loans. Please provide the data in both hard copy and electronic (Microsoft Excel) formats, with all data and formulas intact.
- A-215. See the attached CD in the folder titled Question No. 215 for the files that provide support for the calculation of the short-term and long-term interest cost rates shown in Exhibit 2. A petition for confidential treatment of the file titled "Attachment to LGE AG 1-215(b)" is filed simultaneously herewith. The files also show the details of issuance date, issuance costs, underwriters and associated costs. There are no SEC filings associated with any of the Company's outstanding debt.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 216

Responding Witness: William Steven Seelye

- Q-216. Please provide a fully executable computerized copy of the LG&E electric class cost of service study in Microsoft Excel format. In this response provide all linked files.
- A-216. See response to KPSC-2 Question No. 125.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 217

Responding Witness: William Steven Seelye

- Q-217. Please explain and provide all workpapers and spreadsheets showing the determination of the separation of Production and Transmission costs among Base, Intermediate, and Peak implicit in the determination in LG&E Seelye Exhibit 22. In this response, explain the relevance or relationship with LG&E Seelye Exhibit 22 of the Non-Time-Differentiated cost (34.89%), Summer Peak Period Cost (21.86%) and Winter Peak Period Costs (43.25%). Please provide this response in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel), including all workpapers, source documents, calculations etc. that support the amounts, assumptions, and calculations presented therein.
- A-217. See response to KPSC-2 Question No. 125. Also, see attached CD, in the folder titled Question No. 217.

Day	Season Summer Non-Summer	Weekday Weekend	On-Peak	Off-Peak
Day	Non-Juniner	Weekend	On-1 car	On-i cak
11/1/2008	0	0	0	24
11/2/2008	0	0	0	24
11/3/2008	0	1	16	8
11/4/2008	0	1	16	8
11/5/2008	0	1	16	8
11/6/2008	0	1	16	8
11/7/2008	0	1	16	8
11/8/2008	0	0	0	24
11/9/2008	0	0	0	24
11/10/2008	0	1	16	8
11/11/2008	0	1	16	8
11/12/2008	0	1	16	8
11/13/2008	0	1	16	8
11/14/2008	0	1	16	8
11/15/2008	0	0	0	24
11/16/2008	0	0	0	24
11/17/2008	0	1	16	8
11/18/2008	0	1	16	8
11/19/2008	0	1	16	8
11/20/2008	0	1	16	8
11/21/2008	0	1	16	8
11/22/2008	0	0	0	24
11/23/2008	0	0	0	24
11/24/2008	0	1	16	8
11/25/2008	0	1	16	8
11/26/2008	0	1	16	8
11/27/2008	0	1	16	8
11/28/2008	0	1	16	8
11/29/2008	0	0	0	24
11/30/2008	0	0	0	24
12/1/2008	0	1	16	8
12/2/2008	0	1	16	8
12/3/2008	0	1	16	8
12/4/2008	0	1	16	8
12/5/2008	0	1	16	8
12/6/2008	0	0	0	24
12/7/2008	0	0	0	24
12/8/2008	0	1	16	8
12/9/2008	0	1	16	8
12/10/2008	0	1	16	8
12/11/2008	Ō	1	16	8
12/12/2008	0	1	16	8
12/13/2008	0	0	0	24
12/14/2008	Ō	0	0	24
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	Season			
	Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
12/15/2008	0	1	16	8
12/16/2008	0	1	16	8
12/17/2008	0	1	16	8
12/18/2008	0	1	16	8
12/19/2008	0	1	16	8
12/20/2008	0	Ö	0	24
12/21/2008	0	0	0	24
12/22/2008	0	1	16	8
12/23/2008	Ö	1	16	8
12/24/2008	0	1	16	8
12/25/2008	0	1	16	8
12/26/2008	0	1	16	8
12/27/2008	0	0	0	24
12/28/2008	0	ő	0	24
12/29/2008	0	1	16	8
12/30/2008	0	1	16	8
12/31/2008	0	1	16	8
1/1/2009	0	1	16	8
1/2/2009	0	1	16	8
1/3/2009	0	0	0	24
1/4/2009	0	0	0	24
1/5/2009	0	1	16	8
1/6/2009	0	1	16	8
1/7/2009	0	1	16	8
1/8/2009	0	1	16	8
1/9/2009	0	1	16	8
1/10/2009	0	0	0	24
1/11/2009	0	0	0	24
1/12/2009	0	1	16	8
1/13/2009	0	1	16	8
1/14/2009	0	1	16	8
1/15/2009	0	1	16	8
1/16/2009	0	1	16	8
1/17/2009	0	0	0	24
1/18/2009	0	0	0	24
1/19/2009	0	1	16	8
1/20/2009	0	1	16	8
1/21/2009	0	1	16	8
1/22/2009	0	1	16	8
1/23/2009	0	1	16	8
1/24/2009	0	0	0	24
1/25/2009	0	0	0	24
1/26/2009	0	1	16	8
1/27/2009	0	1	16	8

	Season			
	Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
1/28/2009	0	1	16	8
1/29/2009	0	1	16	8
1/30/2009	0	1	16	8
1/31/2009	0	0	0	24
2/1/2009	0	0	0	24
2/2/2009	0	1	16	8
2/3/2009	0	1	16	8
2/4/2009	0	1	16	8
2/5/2009	0	1	16	8
2/6/2009	0	1	16	8
2/7/2009	0	0	0	24
2/8/2009	0	0	0	24
2/9/2009	0	1	16	8
2/10/2009	0	1	16	8
2/11/2009	0	1	16	8
2/12/2009	0	1	16	8
2/13/2009	0	1	16	8
2/14/2009	0	0	0	24
2/15/2009	0	0	0	24
2/16/2009	0	1	16	8
2/17/2009	0	1	16	8
2/18/2009	0	1	16	8
2/19/2009	0	1	16	8
2/20/2009	0	1	16	8
2/21/2009	0	0	0	24
2/22/2009	0	0	0	24
2/23/2009	0	1	16	8
2/24/2009	0	1	16	8
2/25/2009	0	1	16	8
2/26/2009	0	1	16	8
2/27/2009	0	1	16	8
2/28/2009	0	0	0	24
3/1/2009	0	1	0	24
3/2/2009 3/3/2009	0 0	1	16 16	8 8
3/4/2009	0	1	16	8
3/5/2009	0	1 1	16	8
3/6/2009	0	1	16	8
3/7/2009	0	0	0	6 24
3/8/2009	0	0	0	
3/9/2009	0	1	16	24 8
3/10/2009	0	1	16	8
3/11/2009	0	1	16	8
3/12/2009	0	1	16	8
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	Season Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
3/13/2009	0	1	16	8
3/14/2009	0	Ó	0	24
3/15/2009	0	0	0	24
3/16/2009	0	1	16	8
3/17/2009	0	1	16	8
3/18/2009	0	1	16	8
3/19/2009	0	1	16	8
3/20/2009	0	1	16	8
3/21/2009	0	0	0	24
3/22/2009	0	0	0	24
3/23/2009	0	1	16	8
3/24/2009	0	1	16	8
3/25/2009	0	1	16	8
3/26/2009	0	1	16	8
3/27/2009	0	1	16	8
3/28/2009	0	0	0	24
3/29/2009	0	0	0	24
3/30/2009	0	1	16	8
3/31/2009	0	1	16	8
4/1/2009	0	1	16	8
4/2/2009	0	1	16	8
4/3/2009	0	1	16	8
4/4/2009	0	0	0	24
4/5/2009	0	0	0	24
4/6/2009	0	1	16	8
4/7/2009	0	1	16	8
4/8/2009	0	1	16	8
4/9/2009	0	1	16	8
4/10/2009	0	1	16	8
4/11/2009	0	0	0	24
4/12/2009	0	0	0	24
4/13/2009	0	1	16	8
4/14/2009	0	1	16	8
4/15/2009	0	1	16	8
4/16/2009	0	1	16	8
4/17/2009	0	1	16	8
4/18/2009	0	0	0	24
4/19/2009	0	0	0	24
4/20/2009	0	1	16	8
4/21/2009	0	1	16	8
4/22/2009	0	1	16	8
4/23/2009	0	1	16	8
4/24/2009	0	1	16	8
4/25/2009	0	0	0	24

	Season Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
4/26/2009	0	0	0	24
4/27/2009	0	1	16	8
4/28/2009	0	1	16	8
4/29/2009	0	1	16	8
4/30/2009	0	1	16	8
5/1/2009	1	1	12	12
5/2/2009	1	0	0	24
5/3/2009	1	0	0	24
5/4/2009	1	1	12	12
5/5/2009	1	1	12	12
5/6/2009	1	1	12	12
5/7/2009	1	1	12	12
5/8/2009	1	1	12	12
5/9/2009	1	0	0	24
5/10/2009	. 1	0	0	24
5/11/2009	1	1	12	12
5/12/2009	1	1	12	12
5/13/2009	1	1	12	12
5/14/2009	1	1	12	12
5/15/2009	1	1	12	12
5/16/2009	1	0	0	24
5/17/2009	1	0	0	24
5/18/2009	1	1	12	12
5/19/2009	1	1	12	12
5/20/2009	1	1	12	12
5/21/2009	1	1	12	12
5/22/2009	1	1	12	12
5/23/2009	1	0	0	24
5/24/2009	1	0	0	24
5/25/2009	1	1	12	12
5/26/2009	1	1	12	12
5/27/2009	1	1	12	12
5/28/2009	1	1	12	12
5/29/2009	1	1	12	12
5/30/2009	1	0	0	24
5/31/2009	1	0	0	24
6/1/2009	1	1	12	12
6/2/2009	1	1	12	12
6/3/2009	1	1	12	12
6/4/2009	1	1	12	12
6/5/2009	1	1	12	12
6/6/2009	1	0	0	24
6/7/2009	1	0	0	24
6/8/2009	1	1	12	12

	Season Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
6/9/2009	1	1	12	12
6/10/2009	1	1	12	12
6/11/2009	1	1	12	12
6/12/2009	1	1	12	12
6/13/2009	1	0	0	24
6/14/2009	1	0	0	24
6/15/2009	1	1	12	12
6/16/2009	1	1	12	12
6/17/2009	1	1	12	12
6/18/2009	1	1	12	12
6/19/2009	1	1	12	12
6/20/2009	1	0	0	24
6/21/2009	1	0	0	24
6/22/2009	1	1	12	12
6/23/2009	1	1	12	12
6/24/2009	1	1	12	12
6/25/2009	1	1	12	12
6/26/2009	1	1	12	12
6/27/2009	1	0	0	24
6/28/2009	1	0	0	24
6/29/2009	1	1	12	12
6/30/2009	1	1	12	12
7/1/2009	1	1	12	12
7/2/2009	1	1	12	12
7/3/2009	1	1	12	12
7/4/2009	1	0	0	24
7/5/2009	1	0	0	24
7/6/2009	1	1	12	12
7/7/2009	1	1	12	12
7/8/2009	1	1	12	12
7/9/2009	1	1	12	12
7/10/2009	1	1	12	· 12
7/11/2009	1	0	0	24
7/12/2009	1	0	0	24
7/13/2009	1	1	12	12
7/14/2009	1	1	12	12
7/15/2009	1	1	12	12
7/16/2009	1	1	12	12
7/17/2009	1	1	12	12
7/18/2009	1	0	0	24
7/19/2009	1	0	0	24
7/20/2009	1	1	12	12
7/21/2009	1	1 1	12 12	12
7/22/2009	ı	I	12	12

12 (0011010 211				
Day	Season Summer Non-Summer	Weekday Weekend	On-Peak	Off-Peak
7/23/2009	1	1	12	12
7/24/2009	1	1	12	12
7/25/2009	1	0	0	24
7/26/2009	1	Ő	0	24
7/27/2009	1	1	12	12
7/28/2009	1	1	12	12
7/29/2009	1	1	12	12
7/30/2009	1	1	12	12
7/31/2009	1	1	12	12
8/1/2009	1	0	0	24
8/2/2009	1	0	0	24
8/3/2009	1	1	12	12
8/4/2009	1	1	12	12
8/5/2009	1	1	12	12
8/6/2009	1	1	12	12
8/7/2009	1	1	12	12
8/8/2009	1	0	0	24
8/9/2009	1	0	0	24
8/10/2009	1	1	12	12
8/11/2009	1	1	12	12
8/12/2009	1	1	12	12
8/13/2009	1	1	12	12
8/14/2009	1	1	12	12
8/15/2009	1	0	0	24
8/16/2009	1	0	0	24
8/17/2009	1	1	12	12
8/18/2009	1	1	12	12
8/19/2009	1	1	12	12
8/20/2009	1	1	12	12
8/21/2009	1	1	12	12
8/22/2009	1	0	0	24
8/23/2009	1	0	0	24
8/24/2009	1	1	12	12
8/25/2009	1	1	12	12
8/26/2009	1	1	12	12
8/27/2009	1	1	12 12	12
8/28/2009	1	1	0	12
8/29/2009 8/30/2009	1	0 0	0	24
	1			24
8/31/2009 9/1/2009	1	1 1	12 12	12 12
9/1/2009	1	1	12	12
9/3/2009	1	1	12	12
9/4/2009	1	1	12	12
3/4/2003		I	14	12

	Season Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
9/5/2009	1	0	0	24
9/6/2009	1	0	ő	24
9/7/2009	1	1	12	12
9/8/2009	1	1.	12	12
9/9/2009	1	1	12	12
9/10/2009	1	1	12	12
9/11/2009	1	1	12	12
9/12/2009	1	Ö	0	24
9/13/2009	1	Ő	Ő	24
9/14/2009	1	1	12	12
9/15/2009	1	1	12	12
9/16/2009	1	1	12	12
9/17/2009	1	1	12	12
9/18/2009	1	1	12	12
9/19/2009	1	Ö	0	24
9/20/2009	1	Ő	0	24
9/21/2009	1	1	12	12
9/22/2009	1	1	12	12
9/23/2009	1	1	12	12
9/24/2009	1	1	12	12
9/25/2009	1	1	12	12
9/26/2009	1	Ó	0	24
9/27/2009	1	ő	0	24
9/28/2009	1	1	12	12
9/29/2009	1	1	12	12
9/30/2009	1	1	12	12
10/1/2009	0	1	16	8
10/2/2009	0	1	16	8
10/3/2009	0	Ô	0	24
10/4/2009	0	0	0	24
10/5/2009	0	1	16	8
10/6/2009	0	1	16	8
10/7/2009	0	1	16	8
10/8/2009	0	1	16	8
10/9/2009	0	1	16	8
10/10/2009	0	0	0	24
10/11/2009	0	0	0	24
10/12/2009	0	1	16	8
10/13/2009	0	1	16	8
10/14/2009	0	1	16	8
10/15/2009	0	1	16	8
10/16/2009	0	1	16	8
10/17/2009	0	0	0	24
10/18/2009	0	0	0	24

	Season			
	Summer	Weekday		
Day	Non-Summer	Weekend	On-Peak	Off-Peak
10/19/2009	0	1	16	8
10/20/2009	0	1	16	8
10/21/2009	0	1	16	8
10/22/2009	0	1	16	8
10/23/2009	0	1	16	8
10/24/2009	0	0	0	24
10/25/2009	0	0	0	24
10/26/2009	0	1	16	8
10/27/2009	0	1	16	8
10/28/2009	0	1	16	8
10/29/2009	0	1	16	8
10/30/2009	0	1	16	8
10/31/2009	0	0	0	24

	On-Peak	Off-Peak	Total
Total	3,724	5,036	8,760
Summer	1,308	2,364	3,672
Winter	2,416	2,672	5,088

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 218

Responding Witness: William Steven Seelye

- Q-218. Please provide all workpapers, source documents, and electronic spreadsheets showing the development of each external allocator ("functional vector") utilized in Mr. Seelye's LG&E class cost of service study and referred to at Page 87. In this response, provide the source for all data and the bases for any weightings. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-218. See attached CD, in folder titled Question No. 218.

Louisville Gas and Electric Company	Determination of Meter Allocation
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Residential Service Rate RS \$ 65.34 347,573.00 \$ General Service Rate GS 71.87 41,583.00 \$ Power Service Primary 518.03 90.00 Power Service Primary 326.46 3,063.00 Commercial TOD Service Primary 397.40 84.00 Retail Transmission Service 2,099.40 5.00 Industrial TOD Service Primary 2,127.46 45.00 Industrial TOD Service Secondary 2,099.46 17.00 Fort Knox 2,266.00 1.00 Louisville Water Company 2,576.67 2.00 Street Lighting Rate SLE 65.34 108.00			Cost per Meter	Year-End Customers	Total Meter Cost	Allocation Factor
71.87 41,583.00 518.03 90.00 8 Primary 397.40 21.00 9 Secondary 397.40 84.00 10 Secondary 2,099.40 5.00 10 Secondary 2,099.46 17.00 10 Secondary 2,099.46 17.00 10 Secondary 2,266.00 1.00 10 Secondary 2,576.67 2.00 10 Secondary 2,576.67 2.00 10 Secondary 2,576.67 1.00	Residential Service Rate RS	€9	65.34		22,708,843	0.84107
518.03 326.46 3, 397.40 397.40 2,099.40 2,099.46 2,099.46 2,266.00 2,576.67	General Service Rate GS		71.87	41,583.00	2,988,529	0.11069
326.46 3, 397.40 2,099.40 2,127.46 2,099.46 2,099.46 2,266.00 2,576.67 65.34	Power Service Primary		518.03	00.06	46,623	0.00173
397.40 2,099.40 2,127.46 2,099.46 2,099.46 2,266.00 2,576.67	Power Service Secondary		326.46	3,063.00	756,999	0.03704
397.40 2,099.40 2,127.46 2,099.46 2,266.00 2,576.67 65.34	Commercial TOD Service Primary		397.40	21.00	8,345	0.00031
2,099.40 2,127.46 2,099.46 2,266.00 2,576.67 65.34	Commercial TOD Service Secondary		397.40	84.00	33,382	0.00124
2,127.46 2,099.46 2,266.00 2,576.67 65.34	Retail Transmission Service		2,099.40	5.00	10,497	0.00039
2,099.46 2,266.00 2,576.67 65.34	Industrial TOD Service Primary		2,127.46	45.00	95,736	0.00355
2,266.00 2,576.67 65.34	Industrial TOD Service Secondary		2,099.46	17.00	35,691	0.00132
2,576.67	Fort Knox		2,266.00	1.00	2,266	0.00008
65.34	Louisville Water Company		2,576.67	2.00	5,153	0.00019
	Street Lighting Rate SLE		65.34	108.00	7,056	0.00026
Street Lighting Rate TLE . 65.34 886.00	Street Lighting Rate TLE		65.34	886.00	57,887	0.00214

Attachment to Response to LGE AG-1 Question No. 218
Page 1 of 2
Seelye

Louisville Gas and Electric Company Determination of Services Allocation

	<i>O</i> 3	Cost per Service	Year-End Customers	Total Service Cost	Allocation Factor
Residential Service Rate RS	€9	52.69	347,573 \$	18,312,472	0.88364
General Service Rate GS		69.65	41,583	2,896,212	0.10572
Power Service Primary		•	ı	ı	0.00000
Power Service Secondary		1,034.71	3,063	3,169,312	0.00779
Commercial TOD Primary		•	ı	,	0.00000
Commercial TOD Secondary		728.74	84	61,214	0.00021
Industrial TOD Primary		•	•	1	0.00000
Retail Transmission Service				ı	0.00000
Industrial TOD Secondary		1,217.45	45	54,785	0.00011
Fort Knox		•	ı	ı	0.00000
Louisville Water Company		1	ı	1	0.00000
Street Lighting Rate SLE		55.13	108	5,954	0.00027
Street Lighting Rate TLE		31.99			0.00225
			393,342 \$	24,528,292	1.000000

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 219

Responding Witness: Shannon L. Charnas

- Q-219. For each KU and LG&E generating unit that was in service at the end of the test year, owned individually, jointly, or partially, please provide the following:
 - (a) names of owners (and ownership percentages);
 - (b) type and fuels;
 - (c) total nameplate (rated) capacity (MW);
 - (d) total and individual company gross investment at the end of test year;
 - (e) total and individual company depreciation reserve at the end of test year;
 - (f) total and individual company annual test year depreciation expense;
 - (g) gross KWH produced during the test year; and,
 - (h) net (less station use) KWH produced during the test year.
- A-219. (a) (e) See attached.
 - (f) Depreciation expense is not tracked separately by unit. See response to Question No. 253.
 - (g) (h) See attached.

Attachment to Response to LGE AG-1 Question No. 219
Page 1 of 4
Charnas

			Ownershin				Generator			
			Percentage (a)		18. Y 1884 1847 1847		Nameplate	Generator Na	Generator Nameplate Ownership (MW) (c)	hip (MW) (c)
Generating	(3)	VII	I CH	Other	Tvne (b)	Fuels (b)	Ratings (MW) (c)	KÜ	LGE	Other
Unit (a)	Owiler (a)	W	70001		Conventional	Hvdro	10		10	
Ohio Falls 4	בכב		2/001			I London	Ç		0	
Ohio Falls 5	TGE		%001		Conventional	nyano	2 5		2 2	
Ohio Falls 6	LGE		100%		Conventional	Hydro	2		2 :	
Ohio Falls 7	LGE		100%		Conventional	Hydro	13		<u>:</u>	
Ohio Falls 8	LGE		100%		Conventional	Hydro	01		0	
Paddys Run 13	Joint	47%	53%		Conventional	Gas	178	84	94	***
Trimble County 1	1.OF		75%	25%	Conventional	Coal	999		425	141
Trimble County 5	Loint	71%	78%		Conventional	Gas	199	141	58	
Trimble County 6	Tornt	71%	73%		Conventional	Gas	199	141	58	
Trimble County 7	Toint	63%	37%		Conventional	Gas	166	125	74	
Trimble County 8	Joint	63%	37%		Conventional	Gas	661	125	74	
Trimble County 9	Joint	63%	37%		Conventional	Gas	661	125	74	
Trimble County 10	Joint	63%	37%		Conventional	Gas	661	125	74	
Tyrone 3	KU	100%			Conventional	Coal	7.5	75		
Cane Run 11	TGE		100%		Conventional	Gas, Oil	16		91	
Paddy's Run 11 Paddy's Run 12	rge rge		100%		Conventional	Gas	16 33		33	
Zom 1	LGE		100%		Conventional	Gas	18		18	

	KU Gross		LGE Gross	Tol	Total Gross		KU Depr.	LGE	LGE Depr.	To	Total Depr.	Test Year	Test Year
Generating	Investment (d) (3)		Investment (d) (3)	Invest	Investment (d) (3)	Re	<u>e</u>	Reserv	Reserve (e) (3)	Rese	Reserve (e) (3)	Gross KWH	Net KWH
Unit (a)	10/31/2009	-	10/31/2009	- 1	10/31/2009		10/31/2009	10/3	10/31/2009	1	10/31/2009	Produced (g)	Froduced (h)
Brown i		292		69	58,239,565	69	(38,325,120)			69	(38,325,120)	322,203,000	289,233,000
Brown 2	\$ 51,604,493	193		6 49	51,604,493	6/9	(31,643,751)				(31,643,751)	675,899,000	627,235,000
Brown 3	\$ 167,769,218	218		∽	167,769,218	49	(106,286,071)		•		(106,286,071)	1,969,587,000	1,834,351,000
Brown 5	\$ 23,548,312	312 \$	24,200,814	69	47,749,126	69	(5,885,501)	s	(6,731,003)	69	(12,616,503)	4,263,000	2,592,000
Brown 6	\$ 40,441,005	\$ 500	23,711,491	69	64,152,496	69	(7,422,115)		(1,895,482)	69	(9,317,597)	36,494,000	34,203,000
Brown 7	\$ 41,311,350	350 \$	23,769,004	69	65,080,354	49	(7,518,918)	9	(4,391,935)	69	(11,910,853)	42,274,000	40,139,000
Brown 8	\$ 36,379,638	538		69	36,379,638	69	(13,243,810)			69	(13,243,810)	9,420,000	7,547,000
Brown 9		328		69	48,505,028	643	(22,213,253)			69	(22,213,253)	2,999,000	1,524,000
Brown 10	\$ 29,531,409	40a		69	29,531,409	64	(13,259,052)			69	(13,259,052)	3,965,000	2,504,000
Brown 11	\$ 44,435,742	742		↔	44,435,742	69	(17,132,705)			69	(17,132,705)	000,900,9	4,493,000
Cane Run 4		<i>ج</i> ع	72,507,681	649	72,507,681			_	(57,865,873)	69	(57,865,873)	1,048,569,000	966,602,000
Cane Run 5		<u>ج</u>	93,964,064	69	93,964,064			9) 8	(64,116,970)	69	(64,116,970)	1,074,519,000	993,114,000
Cane Run 6	NAMES TO ASSOCIATE	69	141,803,002	64	141,803,002				(87,669,199)	6 9	(87,669,199)	1,473,509,000	1,350,253,000
Dix Dam 1 (1)	\$ 12,391,689	689		64	12,391,689	€9	(8,411,524)			69	(8,411,524)	56,279,000	56,130,000
Dix Dam 2 Dix Dam 3													
Ghent 1	\$ 493.607.411			69	493,607,411	6-3	(222,448,016)			69	(222,448,016)	3,183,635,000	2,950,195,000
Ghent 2	\$ 193,971,163	163		₩.	193,971,163	69	(116,623,549)		•	_	(116,623,549)	2,563,425,000	2,362,899,000
Ghent 3	\$ 784,290,812	812		6 9	784,290,812	S	(250,741,094)			69	(250,741,094)	3,715,455,000	3,363,968,000
Ghent 4	\$ 393,801,651	651	THE THINK	∽	393,801,651	S	(184,914,527)				(184,914,527)	3,262,810,000	2,941,478,000
Green River 3	\$ 20,882,040	040		S	20,882,040	69	(16,658,278)			S	(16,658,278)	246,847,000	226,460,000
Green River 4	\$ 44,909,090	060		vs.	44,909,090	649	(35,340,454)		1	S	(35,340,454)	430,230,000	396,032,000
Haefling 1 (2) Haefling 2	\$ 5,695,570	570		∽	5,695,570	٠,	(4,278,109)			S	(4,278,109)	30,000	(140,000)
Haefling 3									****		- 1,1	000,41	(154,000)
Mill Creek 1	***********	€9	163,196,129	64	163,196,129			_	(108,564,217)	_	(108,564,217)	2,286,876,000	2,060,877,000
Mill Creek 2		٠,	124,822,261	6 5	124,822,261			e) ;			(81,585,703)	2,340,773,000	2,084,795,000
Mill Creek 3		69	277,074,472	ss)	277,074,472		- • •	_			(147,325,591)	000,720,686,2	2,768,396,000
Mill Creek 4		∽	504,316,481	so.	504,316,481				(252,518,171)	<u>ب</u>	(252,518,171)	3,894,847,000	3,596,774,000
Ohio Falls 1 (1)		69	41,596,196	649	41,596,196) &	(7,925,585)	69	(7,925,585)	236,214,000	230,869,000
Ohio Falls 2							,						
Ohio Falls 3		\dashv											

	KU Gross	LGE Gross	Total Gross	KU Depr.	LGE Depr.	Total Depr.	Test Year	Test Year
Generating	Investment (d) (3)	Investment (d) (3) Investment (d) (3)	Investment (d) (3)	Reserve (e) (3)	Reserve (e) (3)	Reserve (e) (3)	Gross KWH	Net KWH
Unit (a)	10/31/2009	10/31/2009			10/31/2009	10/31/2009	Produced (g)	Produced (h)
Ohio Falls 4								
Ohio Falls 5								
Ohio Falls 6								
Ohio Falls 7				w z zwoaca n				
Ohio Falls 8		7000000					77 200	
Paddys Run 13	\$ 30,440,299	\$ 34,473,561	\$ 64,913,860	\$ (7,042,761) \$	\$ (8,021,545) \$	\$ (15,064,306)	1,262,000	1,262,000
Trimble County 1		\$ 607,594,315	\$ 607,594,315		\$ (265,212,698)	\$ (265,212,698)	3,821,160,000	3,559,440,000
Trimble County 5	\$ 44,883,466	\$ 18,435,238	\$ 63,318,704	\$ (11,236,403)	\$ (4,628,791)	v9	43,621,000	43,621,000
Trimble County 6	\$ 42,369,611	\$ 17,124,567	\$ 59,494,178	\$ (10,292,538)	\$ (4,238,004)	\$ (14,530,543)	24,504,000	24,504,000
Trimble County 7	\$ 33,018,533	\$ 19,326,392	\$ 52,344,924	\$ (6,152,271)	\$ (3,614,248)	\$ (9,766,519)	38,658,000	38,658,000
Trimble County 8	\$ 32,779,521	\$ 19,175,136	\$ 51,954,657	(6,107,506)	\$ (3,585,849)	69	34,284,000	34,284,000
Trimble County 9	\$ 32,886,043	\$ 19,223,229	\$ 52,109,272	\$ (5,865,276)	\$ (3,441,095)	\$ (9,306,371)	23,995,000	23,995,000
Trimble County 10	\$ 36,787,164	\$ 21,650,978	\$ 58,438,142	\$ (6,241,514)	\$ (3,730,240)	\$ (9,971,753)	19,039,000	19,039,000
Tyrone 3	\$ 26,123,876		\$ 26,123,876	\$ (19,981,745)		\$ (19,981,745)	75,836,000	68,321,000
Cane Run 11		3,249,070	\$ 3,249,070		\$ (1,891,204)	\$ (1,891,204)	212,000	212,000
Paddy's Run 11		1,609,957	1,609,957		\$ (1,638,299)	\$ (1,638,299)	20,000	20,000
Paddy's Run 12		\$ 3,183,011	\$ 3,183,011		\$ (3,396,399)	\$ (3,396,399)	0	0
Zom 1		\$ 1,899,048	\$ 1,899,048		\$ (1,930,481)	\$ (1,930,481)	231000	231000

(1) Gross, net generation, investment, & depreciation reserve reported for Dix Dam, and Ohio Falls represents total plant.

Generation is not reported on a per unit basis, and fixed asset costs are not accumulated on a per unit basis

(2) Investment, & depreciation reserve reported for Haefling represents total plant. Fixed asset costs are not accumulated on a per unit basis

⁽³⁾ Investment and Depreciation Reserve is shown for active units only. This does not include structural components still in place, land, and ARO costs associated with retired units.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 220

Responding Witness: Paul W. Thompson/Shannon L. Charnas

- Q-220. For each KU and LG&E generating unit included in this rate application that was not actually in service at the end of the test year, i.e., included in CWIP, please provide the following:
 - (a) names of owners (and ownership percentages);
 - (b) type and fuels;
 - (c) total nameplate (rated) capacity (MW);
 - (d) total and individual company gross investment at the end of test year;
 - (e) total expected gross investment when ultimately placed in service; and,
 - (f) design or expected rate of each fuel type.
- A-220. The only unit that was being constructed and that was not in-service at the end of the test year was Trimble County Unit 2 (TC2). Items a-f below relate only to TC2.
 - (a) The owners and relative ownership interests are as follows:

60.75%
14.25%
12.88%
12.12%

(b) The new TC2 unit is designed to use fuel oil for startup and stabilization fuel. For generation, TC2 will burn primarily Eastern bituminous coal from the Illinois Basin. The unit is also designed to burn a blend of Eastern bituminous and sub-bituminous (Powder River Basin) coal with the sub-bituminous content not exceeding 50% on a weighted basis.

(c) The Gross Generator Name Plate rating is 838 MW.

(d) The investments by Company at the end of the test year are:

KU \$653.5 million

LG&E \$175.9 million

(e) The expected gross investment by Company when the unit is placed inservice is:

KU

\$688.0 million

LG&E

\$182.2 million

(f.) The unit's performance values are based on a 70/30 blend of bituminous/sub-bituminous coal; however, the expected rate of each coal type will vary based on market prices and availability.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 221

Responding Witnesses: Robert M. Conroy/William Steven Seelye

- Q-221. Please provide the combined KU and LG&E generating order of dispatch by unit and basis for this order of dispatch for units in service during the test year.
- A-221. Please see the attached dispatch merit order. The dispatch merit order provided is based on unit assumptions at full load considering fuel and variable costs. The schedule is updated monthly. The schedule attached is for the month of October, 2009. Actual dispatch merit order is determined dynamically in the Energy Management System (EMS) based on heat rate curves and operating parameters for each unit.

Attachment to Reponse to LGE AG-1 Question No. 221 Page 1 of 1 Conroy/Seelye

MILL CREEK 1
TRIMBLE 1
MILL CREEK 4
MILL CREEK 3
MILL CREEK 2
SMITH 2
GHENT 2
GHENT 1
GHENT 4
SMITH 1
CANE RUN 4
GHENT 3
CANE RUN 6
CANE RUN 5
GR RIVER 4
GR RIVER 3
BROWN 3
BROWN 2
BROWN 1
TRIMBLE 5
TRIMBLE 6
TRIMBLE 7
TRIMBLE 8
TRIMBLE 9
TRIMBLE 10
BROWN 6
BROWN 7
BROWN 8
BROWN 9
BROWN 10
BROWN 11
BROWN 5
PADDYS RUN 13
PADDYS RUN 11
CANE RUN 11
PADDYS RUN 12
ZORN 1
HAEFLING

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 222

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-222. Please provide the combined KU and LG&E generating order of dispatch by unit and basis for this order of dispatch, with the addition of all units currently included in CWIP.
- A-222. Please see the response to Question No. 221. Trimble County Unit 2 (TC2) is expected to be among the top six units in the dispatch merit order once unit commissioning is completed, along with Trimble County Unit 1 and the four Mill Creek units. However TC2 will not be included in the dispatch merit order until the unit goes in-service.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 223

Responding Witness: William Steven Seelye

- Q-223. Please provide total system, total KU, total LG&E, and LG&E class contributions to each monthly system (KU + LG&E) coincident peak demand during the test year. Provide class contributions at generation voltage level. In this response please provide the date and hour of each provided observation.
- A-223. See response to KIUC-1 Question No. 31.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 224

Responding Witness: William Steven Seelye

- Q-224. Please provide total system, total KU, total LG&E, and LG&E class contributions to the 24 highest system (KU + LG&E) coincident peak demands during the test year. In this response, please provide the date and hour of each provided observation.
- A-224. See page 1 of attached for system peaks; see pages 2 and 3 for class contributions to the system peaks at generation voltage level.

Louisville Gas and Electric Company Case No. 2009-00549 24 Highest System Peaks

	System Load		
ObsTime	(kWh)	LGE Load	KU Load
1/16/09 8:00	6,555,000	1,915,000	4,640,000
1/16/09 7:00	6,489,000	1,923,000	4,566,000
1/16/09 9:00	6,405,000	1,884,000	4,521,000
8/10/09 15:00	6,367,000	2,479,000	3,888,000
8/10/09 14:00	6,328,000	2,454,000	3,874,000
8/10/09 16:00	6,320,000	2,468,000	3,852,000
6/25/09 14:00	6,319,000	2,524,000	3,795,000
8/10/09 13:00	6,290,000	2,470,000	3,820,000
6/25/09 15:00	6,257,000	2,521,000	3,736,000
1/16/09 10:00	6,222,000	1,864,000	4,358,000
6/25/09 13:00	6,212,000	2,484,000	3,728,000
8/10/09 17:00	6,208,000	2,407,000	3,801,000
1/16/09 6:00	6,188,000	1,821,000	4,367,000
1/15/09 20:00	6,180,000	1,918,000	4,262,000
8/10/09 12:00	6,170,000	2,406,000	3,764,000
6/19/09 14:00	6,166,000	2,421,000	3,745,000
6/25/09 16:00	6,166,000	2,510,000	3,656,000
1/15/09 19:00	6,165,000	1,921,000	4,244,000
1/21/09 7:00	6,149,000	1,804,000	4,345,000
6/19/09 15:00	6,143,000	2,412,000	3,731,000
6/25/09 12:00	6,127,000	2,452,000	3,675,000
6/26/09 14:00	6,125,000	2,473,000	3,652,000
6/19/09 13:00	6,122,000	2,391,000	3,731,000
1/21/09 8:00	6,120,000	1,790,000	4,330,000

Louisville Gas and Electric Company Case No. 2009-00549

	LGE (kWh)	LGE (kWh)	Class Cont LGE (kWh)	Class Contributions to 24 Highest System Peaks 5E (kWh) LGE (kWh) LGE (kWh) LGE (kWh)	24 Highest S. LGE (kWh)	ystem Peaks LGE (kWh)	LGE (kWh)	LGE (kWh)	LGE (kWh)
	Residential	General Service	CPS Primary	CPS Secondary	CTOD Primary	CTOD Secondary	IPS Secondary	IPS Primary	ITOD Secondary
ObsTime		100	210	220	230	240	300	320	400
1/16/09 8:00	778,786	5 281,780	23,196	335,569	41,489	59,841	81,524	20,425	5,892
1/16/09 7:00	800,112	262,695	33,370	319,794	40,780	58,560	78,674	18,725	2,690
1/16/09 9:00	744,638	3 280,060	23,176	338,994	42,576	666'65	81,922	20,933	6,023
8/10/09 15:00	1,178,425	322,201	31,868	385,933	54,730	69,106	82,599	16,866	7,821
8/10/09 14:00		349,099	32,799	393,189	55,407	269'692	87,824	18,254	7,741
8/10/09 16:00	1,223,907	7 283,873	30,957	373,784	53,545	66,640	76,880	15,362	7,449
6/25/09 14:00		331,901	33,439	366,160	58,066	70,468	88,835	18,143	
8/10/09 13:00	1,077,647	7 354,513	32,711	397,065	55,676	69,752	91,170	19,280	
6/25/09 15:00		314,242	32,375	360,109	57,004	686'69	82,565	17,333	6,347
1/16/09 10:00		3 279,230) 23,221	338,856	42,981	. 59,266	84,096	20,832	6,055
6/25/09 13:00	1,131,751	1 343,238	33,634	367,212	58,062	986'69	92,725	18,971	6,812
8/10/09 17:00			30,302	354,136	51,892	61,687	75,169	14,475	7,416
1/16/09 6:00	782,564	1 223,414	1 22,102	290,804	39,074	54,211	70,119	16,452	5,532
1/15/09 20:00	886,434	1 213,548	3 22,088	297,928	39,319	53,678	68,299	16,713	
8/10/09 12:00	1,008,867	7 355,389	32,202	390,672	55,158	69,064	94,570	19,349	7,839
6/19/09 14:00	1,151,241		1 33,078	355,067	66)'09	70,207	81,483	16,962	6,318
6/25/09 16:00	1,286,023	3 293,525	31,446	346,004	55,662	67,716	78,428	15,888	
1/15/09 19:00	860,851	1 232,274	1 22,442	305,721	39,988	54,733	68,932	15,842	5,972
1/21/09 7:00	678,522	2 248,987	7 22,007	302,101	39,837	, 55,275	89,134	19,438	
6/19/09 15:00	1,194,223		32,309	348,274	59,547	7 69,857	75,651	16,281	6,155
6/25/09 12:00	1,091,619	346,642	33,647	365,428	58,028	3 69,862	95,094	18,884	
6/26/09 14:00	1,175,289	340,429	33,564	364,334	59,290	70,448	82,063	13,582	
6/19/09 13:00	1,096,617	7 319,771	33,096	358,423	60,558	3 70,380	85,873	17,941	
1/21/09 8:00	650,835	5 269,152	21,661	315,731	40,887	, 56,460	90,757	, 20,529	6,270

Attachment to LGE AG-1 Question No. 224
Page 2 of 3

Seelye

Louisville Gas and Electric Company Case No. 2009-00549

Attachment to LGE AG-1 Question No. 224
Page 3 of 3
Seelye

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 225

Responding Witnesses: Robert M. Conroy/William Steven Seelye

- Q-225. For each KU and LG&E generating unit, please provide all forced (unscheduled) outages (dates, time, and duration) by unit during the test year.
- A-225. Please see the attached. The schedule includes both forced outages and maintenance outages by unit.

		Attaci	mienir to vesh	Page 1 of 10
Unit	Event	Event	Event	Page 1 of 19
<u>Name</u>	Start	<u>End</u>	<u>Hours</u>	Conroy / Seelye
BR1	12/13/08 11:52	12/14/08 13:00	25.13	
BR1	12/23/08 20:33	12/24/08 15:45	19.20	
BR1	2/6/09 8:53	2/17/09 20:41	275.80	
		2/18/09 17:06		
BR1	2/18/09 16:07		0.98	
BR1	3/5/09 17:02	3/6/09 16:09	23.12	
BR1	3/23/09 5:40	3/23/09 13:30	7.83	
BR1	3/27/09 6:30	3/27/09 17:40	11.17	
BR1	5/2/09 9:34	5/3/09 19:45	34.18	
BR1	5/6/09 9:00	5/8/09 19:23	58.38	
BR1	6/21/09 6:12	6/21/09 7:13	1.02	
BR1	7/10/09 20:01	7/10/09 22:13	2.20	
BR1	7/22/09 0:01	7/22/09 21:55	21.90	
BR1	7/23/09 4:00	7/23/09 5:20	1.33	
BR2	12/5/08 15:45	12/7/08 15:39	47.90	
BR2	12/29/08 21:04	12/30/08 4:39	7.58	
BR2	1/12/09 4:25	1/12/09 6:30	2.08	
BR2	4/18/09 2:45	4/19/09 2:31	23.77	
BR2	4/19/09 2:31	4/19/09 8:48	6.28	
BR2	4/19/09 10:30	4/19/09 14:36	4.10	
BR2	4/27/09 14:57	4/28/09 1:57	11.00	
BR2	4/28/09 2:03	4/28/09 2:46	0.72	
BR2	4/28/09 9:43	4/29/09 21:07	35.40	
BR2	4/29/09 21:16	4/29/09 22:03	0.78	
BR2	5/28/09 21:42	6/1/09 9:02	83.33	
BR2	6/28/09 0:31	6/29/09 1:48	25.28	
BR2	7/22/09 0:01	7/22/09 21:55	21.90	
BR3	12/29/08 20:39	12/31/08 21:40	49.02	
BR3	2/18/09 0:53	2/19/09 5:07	28.23	
BR3	2/24/09 23:47	2/26/09 19:17	43.50	
BR3	5/20/09 2:43	5/20/09 19:41	16.97	
BR3	5/20/09 19:43	5/20/09 20:08	0.42	
BR3	6/4/09 14:30	6/4/09 18:05	3.58	
BR3	6/5/09 3:30	6/5/09 13:45	10.25	
BR3	6/15/09 14:56	6/16/09 5:27	14.52	
BR3	6/24/09 17:03	7/6/09 2:15	273.20	
BR3	7/6/09 7:40	7/6/09 23:05	15.42	
BR3	8/24/09 6:11	8/25/09 7:03	24.87	
BR3	8/25/09 7:03	8/25/09 21:07	14.07	
BR3	9/18/09 18:08	9/25/09 23:36	173.47	
BR3	9/28/09 9:24	9/28/09 14:50	5.43	
BR3	10/29/09 20:33	11/1/09 5:46	57.22	
BR5	11/6/08 13:00	11/6/08 15:48	2.80	
BR5	11/7/08 9:15	11/7/08 12:29	3.23	
BR5	12/18/08 10:00	12/18/08 14:45	4.75	
BR5	12/19/08 7:11	12/19/08 15:46	8.58	
BR5	12/31/08 6:30	12/31/08 15:13	8.72	
BR5	1/2/09 7:00	1/2/09 14:30	7.50	
BR5	1/5/09 6:30	1/5/09 13:05	6.58	
BR5	1/8/09 8:15	1/8/09 12:38	4.38	
BR5	1/9/09 10:07	1/9/09 11:15	1.13	

		Attaci	micht to Kespt	Page 2 of 10
Unit	Event	Event	Event	Page 2 of 19
<u>Name</u>	Start	<u>End</u>	<u>Hours</u>	Conroy / Seelye
BR5	1/15/09 18:35	1/15/09 19:12	0.62	
BR5	1/17/09 7:50	1/17/09 12:45	4.92	
BR5	1/17/09 18:12	1/18/09 8:25	14.22	
BR5	2/3/09 7:15	2/3/09 14:39	7.40	
BR5	3/3/09 3:25	3/3/09 7:41	4.27	
BR5	10/16/09 12:33	10/21/09 14:30	121 95	
	(3) (3) (2.00		121 00	
BR6	11/3/08 6:30	11/6/08 6:00	71.50	
BR6	11/6/08 6:00	11/6/08 16:00	10.00	
BR6	11/8/08 8:00	11/8/08 9:42	1.70	
BR6	11/10/08 8:26	11/10/08 13:03	4.62	
BR6	11/25/08 14:38	11/25/08 17:15	2.62	
BR6	11/26/08 10:20	11/26/08 13:00	2.67	
BR6	12/16/08 6:30	12/19/08 15:46	81.27	
BR6	1/6/09 7:30	1/6/09 14:00	6.50	
BR6	1/19/09 7:00	1/19/09 19:30	12.50	
BR6	2/5/09 5:10	2/5/09 6:16	1.10	
BR6	2/6/09 6:40	2/6/09 6:55	0.25	
BR6	2/6/09 7:40	2/6/09 17:45	10.08	
BR6	2/9/09 7:00	2/9/09 14:43	7.72	
BR6	2/10/09 7:00	2/10/09 14:30	7.50	
BR6	2/23/09 5:26	2/23/09 5:43	0.28	
BR6	3/3/09 3:07	3/3/09 5:54	2.78	
BR6	3/5/09 7:30	3/5/09 13:34	6.07	
BR6	3/12/09 9:40	3/12/09 14:30	4.83	
BR6	5/12/09 11:35	5/12/09 13:20	1.75	
BR6	5/14/09 9:15	5/14/09 10:15	1.00	
BR6	5/14/09 13:10	5/27/09 6:30	305.33	
BR6	5/28/09 6:00	5/28/09 14:00	8.00	
BR6	6/16/09 7:30	6/16/09 10:23	2.88	
BR6	6/25/09 9:29	6/25/09 10:28	0.98	
BR6	8/4/09 5:51	8/4/09 6:36	0.75	
BR6	8/5/09 11:05	8/5/09 14:20	3.25	
BR6	8/12/09 18:00	8/15/09 6:05	60.08	
BR6	8/15/09 6:52	9/14/09 13:21	726.48	
BR6	9/14/09 21:21	9/16/09 13:31	40.17	
BR6	9/16/09 14:16	9/21/09 14:37	120.35	
BR6	9/21/09 14:48	9/21/09 15:36	0.80	
BR6	9/21/09 16:39	9/22/09 12:15	19.60	
BR6	9/22/09 21:05	9/23/09 11:25	14.33	
BR6	10/14/09 5:30	10/16/09 16:00	58.50	
BR6	10/28/09 9:00	11/5/09 15:49	198.82	
	13.22 2.00			
BR7	12/9/08 6:30	12/9/08 10:30	4.00	
BR7	12/22/08 7:44	12/22/08 12:31	4.78	
BR7	2/5/09 5:30	2/5/09 6:14	0.73	
BR7	2/6/09 6:14	2/6/09 6:48	0.57	
BR7	2/12/09 7:00	2/12/09 14:45	7.75	
BR7	3/12/09 7:20	3/12/09 9:40	2.33	
BR7	3/27/09 6:00	3/27/09 8:00	2.00	
BR7	4/2/09 6:00	4/3/09 18:00	36.00	
BR7	4/6/09 6:00	4/6/09 20:00	14.00	
BR7	4/21/09 6:00	4/21/09 7:50	1.83	

Attachment to Response to LGE AG-1 Question No. 225

** **	. .		•	Page 3 of 19
Unit	Event	Event	Event	Conroy / Seelye
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	2027, 222.72
BR7	4/30/09 9:49	4/30/09 14:50	5.02	
BR7	6/30/09 5:55	6/30/09 12:42	6.78	
BR7	7/1/09 6:30	7/1/09 13:00	6.50	
BR7	8/22/09 6:09	8/22/09 15:00	8.85	
BR7	8/22/09 15:00	9/4/09 15:30	312.50	
BR7	9/12/09 11:00	9/17/09 14:33	123.55	
BR7	10/15/09 8:30	10/15/09 10:22	1.87	
BR7	10/21/09 11:12	10/21/09 12:33	1.35	
BR8	11/11/08 7:40	11/12/08 14:42	31.03	
BR8	12/16/08 7:40	12/16/08 15:35	7.92	
BR8	1/13/09 16:40	1/13/09 19:43	3.05	
BR8	1/13/09 19:47	1/13/09 20:01	0.23	
BR8	1/22/09 9:15	1/22/09 14:00	4.75	
BR8	2/10/09 11:10	2/10/09 13:30	2.33	
BR8	5/18/09 8:30	5/18/09 11:15	2.75	
BR8	5/29/09 6:00	5/29/09 12:09	6.15	
BR8	6/3/09 12:15	6/4/09 7:08	18.88	
BR8	6/9/09 5:30	6/10/09 13:00	31.50	
BR8	8/20/09 9:30	8/20/09 10:47	1.28	
BR8	9/11/09 6:00	9/11/09 10:10	4.17	
BR8	10/19/09 6:30	10/27/09 16:54	202.40	
BR9	12/10/08 8:30	12/10/08 14:00	5.50	
BR9	1/23/09 9:40	1/23/09 14:07	4.45	
BR9	2/4/09 6:40	2/4/09 8:48	2.13	
BR9	2/20/09 6:15	2/20/09 9:10	2.92	
BR9	3/3/09 3:07	3/3/09 11:20	8.22	
BR9	4/24/09 6:05	4/24/09 12:20	6.25	
BR9	6/9/09 5:30	6/10/09 13:00	31.50	
BR9	6/24/09 17:30	6/25/09 13:44	20.23	
BR9	6/26/09 9:03	6/26/09 12:27	3.40	
BR9	8/20/09 11:37	8/20/09 13:28	1.85	
BR9	8/25/09 12:00	8/26/09 10:25	22.42	
BR9	8/28/09 6:00	8/28/09 9:45	3.75	
BR9	10/7/09 8:32	10/7/09 9:24	0.87	
BR9	10/7/09 9:24	10/7/09 10:02	0.63	
BR10	11/13/08 7:30	11/14/08 13:40	30.17	
	12/16/08 8:00	12/16/08 8:19	0.32	
BR10 BR10	1/21/09 13:00	1/21/09 13:42	0.70	
BR10	2/24/09 13:15	2/25/09 16:30	27.25	
BR10	2/25/09 16:30	2/26/09 16:21	23.85	
BR10	4/13/09 6:00	4/13/09 11:38	5.63	
BR10	6/30/09 16:36	6/30/09 20:30	3,90	
BR10	8/21/09 12:11	8/21/09 13:21	1.17	
BR10	10/8/09 6:15	10/9/09 13:30	31.25	
BR11	11/21/08 6:00	11/21/08 15:30	9.50	
BR11	2/10/09 7:00	2/10/09 11:00	4.00	
BR11	2/17/09 6:50	2/17/09 7:30	0.67	
BR11	3/17/09 17:00	3/18/09 6:22	13.37	
BR11	4/27/09 7:44	4/27/09 8:11	0.45	
BR11	6/1/09 7:00	6/1/09 8:00	1.00	
BR11	6/20/09 9:00	6/20/09 11:52	2.87	
BR11	6/28/09 20:10	6/29/09 13:40	17.50	

Attachment to Response to LGE AG-1 Question No. 225

		Attach	ment to kespo	onse to LGE AG-1 Question No. 225
Unit	Event	Event	Event	Page 4 of 19 Conroy / Seelye
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	Conroy / Seeiye
BR11	8/21/09 10:03	8/21/09 12:11	2.13	
BR11	10/7/09 7:05	10/7/09 8:18	1.22	
BR11	10/12/09 5:30	10/12/09 7:52	2.37	
CR4	1/9/09 22:10	1/11/09 10:49	36.65	
CR4	1/11/09 10:59	1/11/09 11:58	0.98	
CR4	1/11/09 12:34	1/11/09 13:43	1.15	
CR4	1/12/09 5:28	1/13/09 9:15	27.78	
CR4	1/23/09 21:15	1/25/09 6:23	33.13	
CR4	2/21/09 21:12	2/21/09 21:28	0.27	
CR4	5/1/09 21:24	5/4/09 2:37	53.22	
CR4	5/4/09 2:37	5/4/09 3:32	0.92	
CR4	5/13/09 3:51	5/14/09 0:04	20.22	
CR4	5/17/09 1:50	5/17/09 11:40	9.83 5.22	
CR4 CR4	5/17/09 11:40 8/4/09 8:46	5/17/09 16:53 8/5/09 11:44	26.97	
CR4	8/16/09 6:03	8/16/09 7:07	1.07	
CR4	8/17/09 2:46	8/18/09 5:26	26.67	
CR4	8/18/09 5:37	8/18/09 7:20	1.72	
CR4	9/1/09 21:37	9/4/09 7:54	58.28	
CR4	9/11/09 7:03	9/12/09 12:46	29.72	
CR4	9/12/09 22:18	9/13/09 16:42	18.40	
CR4	9/13/09 16:42	9/15/09 4:20	35.63	
CR4	9/15/09 5:04	9/15/09 5:48	0.73	
CR4	9/15/09 6:48	9/15/09 8:22	1.57	
CR5	11/4/08 16:19	11/4/08 18:33	2.23	
CR5	11/8/08 13:26	11/8/08 14:29	1.05	
CR5	12/6/08 21:59	12/7/08 23:49	25.83	
CR5	12/16/08 14:40	12/19/08 9:37	66.95	
CR5	1/2/09 8:27	1/3/09 3:30	19.05	
CR5	1/5/09 6:29	1/5/09 8:04 1/28/09 7:21	1.58	
CR5 CR5	1/28/09 6:01 1/28/09 10:05	1/28/09 11:57	1.33 1.87	
CR5	3/10/09 6:36	3/10/09 14:58	8.37	
CR5	3/24/09 7:33	3/25/09 23:23	39.83	
CR5	5/14/09 18:15	5/14/09 23:16	5.02	
CR5	5/14/09 23:16	5/14/09 23:40	0.40	
CR5	5/14/09 23:41	5/15/09 0:00	0.32	
CR5	8/4/09 8:43	8/6/09 8:45	48.03	
CR5	8/6/09 12:16	8/6/09 16:43	4.45	
CR5	8/10/09 18:08	8/11/09 6:16	12.13	
CR5	8/12/09 15:13	8/13/09 7:04	15.85	
CR5	8/23/09 18:42	8/24/09 1:16	6.57	
CR5	9/9/09 8:15	9/11/09 2:47	42.53	
CR5	9/13/09 16:39	9/15/09 6:34	37.92	
CR5	10/5/09 23:46	10/6/09 7:51	8.08	
CR5	10/10/09 8:00	10/10/09 13:00	5.00	
CR5	10/20/09 0:00	10/20/09 8:00	8.00	
CR6	11/28/08 18:57	12/1/08 11:15	64.30	
CR6	12/1/08 11:15	12/2/08 11:00	23.75	
CR6	12/2/08 11:00	12/3/08 2:10	15.17	
CR6	12/3/08 2:10	12/3/08 14:30	12.33	
CR6	12/3/08 14:30	12/5/08 18:58	52.47	
CR6	12/12/08 1:26	12/12/08 2:19	0.88	

Attachment to Response to LGE AG-1 Question No. 225

		Attaci	illient to kespt	Dans to Ede Ad-1 Question No. 223
Unit	Event	Event	Event	Page 5 of 19
<u>Name</u>	Start	<u>End</u>	<u>Hours</u>	Conroy / Seelye
CR6	12/16/08 6:56	12/19/08 4:56	70.00	
CR6	12/19/08 5:07	12/19/08 6:40	1.55	
CR6	12/20/08 0:13	12/20/08 1:01	0.80	
CR6	12/27/08 20:11	12/28/08 1:45	5.57	
CR6	1/2/09 23:17	1/4/09 3:42	28.42	
CR6	1/24/09 15:43	1/28/09 21:00	101.28	
CR6	1/28/09 21:00	1/29/09 4:00	7.00	
CR6	2/2/09 11:04	2/4/09 12:52	49.80	
CR6	2/11/09 16:45	2/11/09 17:28	0.72	
CR6	2/18/09 14:12	2/18/09 16:05	1.88	
CR6	2/23/09 10:18	2/25/09 14:25	52.12	
CR6	3/6/09 21:19	3/8/09 18:25	45.10	
CR6	3/17/09 22:29	3/18/09 7:30	9.02	
CR6	3/18/09 7:30	3/21/09 0:00	64.50	
CR6	4/9/09 13:29	4/10/09 11:41	22.20	
CR6	4/17/09 23:20	4/18/09 15:04	15.73	
CR6	4/28/09 22:14	5/1/09 13:43	63.48	
CR6	5/1/09 13:43	5/1/09 14:39	0.93	
CR6	5/20/09 10:36	5/24/09 3:15	88.65	
CR6	6/25/09 6:57	6/25/09 17:49	10.87	
CR6	6/27/09 2:16	6/27/09 18:23	16.12	
CR6	7/8/09 7:40	7/9/09 7:58	24.30	
CR6	7/9/09 8:01	7/9/09 8:39	0.63	
CR6	7/9/09 22:53	7/10/09 22:18	23.42	
CR6	7/12/09 16:55	7/12/09 18:17	1.37	
CR6	8/4/09 8:45	8/7/09 4:17	67.53	
CR6	8/14/09 21:02	8/17/09 6:02	57.00	
CR6	8/28/09 9:13	8/28/09 10:50	1.62	
CR6	9/1/09 23:13	9/2/09 2:33	3.33	
CR6	9/13/09 16:42	9/16/09 6:13	61.52	
CR6	9/21/09 13:22	9/21/09 14:17	0.92	
CR6	10/22/09 11:35	10/29/09 17:19	173.73	
0044	40/04/00 40:04	10/00/00 00:50	100.77	
CR11	12/24/08 13:04	12/29/08 22:50	129.77	
CR11	12/29/08 23:15	12/30/08 11:34	12.32	
CR11	1/12/09 8:00	1/12/09 13:30	5.50	
CR11 CR11	1/16/09 5:04 1/28/09 11:00	1/16/09 13:00	7.93 2.28	
CR11	2/3/09 10:00	1/28/09 13:17 2/3/09 13:26	3.43	
CR11	2/4/09 7:47	2/4/09 8:59	1.20	
CR11	6/19/09 20:45	6/20/09 0:35	3.83	
CR11	6/20/09 20:40	6/21/09 8:30	11.83	
CR11	6/21/09 16:30	6/22/09 13:42	21.20	
CR11	6/22/09 14:40	6/24/09 11:25	44.75	
CR11	7/22/09 6:00	7/23/09 12:45	30.75	
CR11	8/5/09 2:00	8/5/09 8:13	6.22	
GH1	12/26/08 0:13	12/27/08 16:15	40.03	
GH1	1/11/09 20:32	1/27/09 0:01	363.48	
GH1	2/26/09 8:47	2/27/09 9:49	25.03	
GH1	2/27/09 11:09	2/27/09 18:24	7.25	
GH1	3/10/09 10:32	3/12/09 0:08	37.60	
GH1	5/24/09 14:21	5/24/09 18:27	4.10	
GH1	5/24/09 19:26	5/24/09 20:52	1.43	
GH1	5/30/09 19:45	5/31/09 23:47	28.03	
GH1	7/17/09 20:53	7/25/09 17:00	188.12	

Unit	Event	Event	Event	Page 6 of 19
<u>Name</u>	Start	End	Hours	Conroy / Seelye
				
GH1	7/25/09 17:00	7/27/09 3:04	34.07	
GH1	8/23/09 2:59	8/23/09 6:12	3.22	,
GH1	9/4/09 16:09	9/6/09 6:37	38.47	
GH1	9/29/09 21:25	10/2/09 17:25	68.00	
GH1	10/19/09 2:42	10/19/09 4:12	1.50	
GH2	12/24/08 1:23	12/26/08 6:55	53.53	
GH2	1/24/09 16:50	1/26/09 0:39	31.82	
GH2	2/4/09 1:55	2/5/09 3:48	25.88	
GH2	2/14/09 11:50	2/15/09 23:28	35.63	
GH2	2/23/09 14:00	2/24/09 12:48	22.80	
GH2	5/16/09 12:09	5/16/09 12:21	0.20	
GH2	5/16/09 16:03	5/16/09 16:57	0.90	
GH2	5/17/09 2:39	5/17/09 16:33	13.90	
GH2	5/19/09 5:15	5/19/09 5:56	0.68	
GH2	5/19/09 16:07	5/19/09 16:47	0.67	
GH2	5/20/09 0:51	5/21/09 9:50	32.98	
GH2	5/22/09 19:59	5/22/09 22:32	2.55	
GH2	5/23/09 0:06	5/23/09 0:48	0.70	
GH2	6/11/09 4:20	6/11/09 5:28	1.13	
GH2	6/12/09 22:27	6/14/09 2:00	27.55	
GH2	7/3/09 22:03	7/4/09 20:23	22.33	
GH2	7/25/09 0:29	7/26/09 23:06	46.62	
GH2	9/20/09 6:02	9/20/09 15:20	9.30	
GH3	11/9/08 4:31	11/9/08 8:37	4.10	
GH3	11/9/08 9:50	11/9/08 10:54	1.07	
GH3	11/11/08 1:40	11/12/08 22:31	44.85	
GH3	11/26/08 23:17	11/27/08 21:14	21.95	
GH3	12/19/08 22:50	12/20/08 22:55	24.08	
GH3	1/5/09 12:21	1/7/09 22:02	57.68	
GH3	2/27/09 3:55	2/27/09 7:23	3.47	
GH3	3/11/09 1:17	3/11/09 3:30	2.22	
GH3	3/11/09 11:37	3/11/09 13:23	1.77	
GH3	3/17/09 8:58	3/20/09 6:54	69.93	
GH3	3/20/09 23:34	3/21/09 16:03	16.48	
GH3	5/8/09 22:16	5/10/09 4:16	30.00	
GH3	7/9/09 21:28	7/11/09 12:41	39.22	
GH3	7/30/09 22:23	8/2/09 18:44	68.35	•
GH3	10/23/09 9:22	10/23/09 10:22	1.00	
GH4	11/15/08 23:56	11/17/08 0:45	24.82	
GH4	12/31/08 23:30	1/1/09 0:00	0.50	
GH4	1/1/09 0:00	1/2/09 0:56	24.93	
GH4	2/13/09 23:17	2/15/09 3:09	27.87	
GH4	2/15/09 3:22	2/15/09 4:16	0.90	
GH4	2/28/09 3:31	2/28/09 7:02	3.52	
GH4	3/13/09 21:10	3/14/09 20:50	23.67	
GH4	4/23/09 22:22	4/26/09 3:22	53.00	
GH4	6/30/09 14:44	7/3/09 18:31	75.78	
GH4	7/10/09 8:37	7/14/09 1:29	88.87	
GH4	7/14/09 2:29	7/14/09 3:28	0.98	
GH4	7/29/09 21:58	7/30/09 5:00	7.03	
GH4	8/3/09 23:12	8/4/09 0:57	1.75	
GH4	8/4/09 3:42	8/4/09 4:58	1.27	
GH4	10/26/09 16:14	10/26/09 22:01	5.78	

Attachment to Response to LGE AG-1 Question No. 225

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		Attacn	ment to kesp
Unit <u>Name</u>	Event <u>Start</u>	Event <u>End</u>	Event <u>Hours</u>
GH4	10/27/09 4:58	10/27/09 15:07	10.15
GR3	12/29/08 10:00	12/29/08 12:28	2.47
GR3	12/30/08 9:20	12/30/08 13:20	4.00
GR3	1/17/09 0:04	1/30/09 15:15	327.18
GR3	1/30/09 15:15	2/3/09 8:07	88.87
GR3	2/3/09 8:07	2/3/09 12:45	4.63
GR3	2/6/09 2:47	2/6/09 4:42	1.92
GR3	2/6/09 5:07	2/6/09 6:18	1.18
GR3	2/20/09 2:31	2/21/09 4:10	25.65
GR3	3/2/09 23:04	3/3/09 23:52	24.80
GR3		4/22/09 20:15	237 78
GR3	4/29/09 2:16	4/29/09 5:43	3.45
GR3	6/17/09 21:05	6/17/09 23:38	2.55
GR3	8/5/09 9:50	8/6/09 9:49	23.98
GR3	8/16/09 22:23	8/18/09 8:27	34.07
GR4	11/23/08 10:11	11/24/08 10:01	23.83
GR4	12/6/08 17:47	12/7/08 18:25	24.63
GR4	12/16/08 18:48	12/17/08 17:56	23.13
GR4	1/12/09 5:45	1/12/09 13:49	8.07
GR4	1/12/09 17:41	1/12/09 18:53	1.20
GR4	1/17/09 11:18	1/18/09 15:40	28.37
GR4	1/28/09 7:54	2/2/09 4:14	116.33
GR4	2/13/09 17:38	2/14/09 22:00	28.37
GR4	3/14/09 13:05	3/14/09 23:50	10.75
GR4	3/18/09 23:30	3/19/09 10:06	10.60
GR4	4/7/09 14:05	4/8/09 18:53	28.80
GR4	4/8/09 20:30	4/8/09 22:02	1.53
GR4	4/9/09 13:42	4/9/09 20:14	6.53
GR4	6/12/09 8:45	6/12/09 15:13	6.47
GR4	8/2/09 2:47	8/3/09 6:51	28.07
GR4	8/29/09 13:12	8/29/09 23:10	9.97
GR4	9/2/09 21:53	9/3/09 7:13	9.33
GR4	9/20/09 2:11	9/20/09 12:02	9.85
GR4	10/2/09 15:08	10/2/09 21:30	6.37
GR4	10/2/09 21:30	11/4/09 0:09	770.65
MC1	11/8/08 18:43	11/10/08 3:55	33.20
MC1	11/10/08 9:38	11/11/08 6:30	20.87
MC1	12/16/08 8:36	12/17/08 15:13	30.62
MC1	1/22/09 0:38	1/23/09 23:13	46.58
MC1	1/23/09 23:23	1/23/09 23:57	0.57
MC1	2/1/09 7:54	2/1/09 8:31	0.62
MC1	2/1/09 8:46	2/1/09 11:54	3.13 19.32
MC1	3/4/09 6:58	3/5/09 2:17	29.72
MC1	3/10/09 20:00	3/12/09 1:43 4/24/09 7:07	32.98
MC1	4/22/09 22:08 5/17/09 7:58	5/19/09 22:54	62.93
MC1	5/19/09 22:54	5/20/09 8:10	9.27
MC1 MC1	5/22/09 13:26	5/24/09 2:27	37.02
MC1	5/24/09 3:10	5/24/09 3:54	0.73
MC1	6/12/09 0:43	6/12/09 2:54	2.18
MC1	7/10/09 16:44	7/11/09 21:19	28.58
MC1	7/10/09 10:44	7/24/09 22:24	51.97
MC1	7/24/09 23:18	7/24/09 23:49	0.52
1412-1	112-1100 20.10	1100 20.70	J.02

	.			Page 8 of 19
Unit	Event	Event	Event	Conroy / Seelye
<u>Name</u>	Start	End	<u>Hours</u>	comby / scarye
MC1	8/11/09 5:05	8/12/09 17:54	36.82	
MC2	11/19/08 11:24	11/20/08 11:45	24.35	
MC2	11/20/08 11:45	11/22/08 10:33	46.80	
MC2	1/28/09 3:59	1/28/09 4:44	0.75	
MC2	2/6/09 23:42	2/9/09 7:23	55.68	
MC2	2/26/09 9:48	2/27/09 14:31	28.72	
MC2	4/3/09 17:50	4/6/09 7:55	62.08	
MC2	4/6/09 7:55	4/6/09 21:04	13.15	
MC2	5/24/09 5:29	5/25/09 14:10	32.68	
MC2	6/12/09 12:07	6/14/09 11:26	47.32	
MC2	6/20/09 9:00	6/21/09 22:09	37.15	
MC2	7/17/09 8:33	7/17/09 21:30	12.95	
MC2	7/17/09 21:30	7/18/09 21:45	24.25	
MC2	8/17/09 0:35	8/17/09 8:55	8.33	
MC2	8/28/09 21:44	8/31/09 8:03	58.32	
MC2	8/31/09 13:12	9/1/09 3:02	13.83	
MC2	10/17/09 15:37	10/19/09 0:47	33.17	
мсз	12/13/08 4:29	12/13/08 6:13	1.73	
мсз	12/16/08 6:08	12/19/08 2:43	68.58	
MC3	1/2/09 22:10	1/4/09 3:26	29.27	
мсз	1/6/09 0:10	1/6/09 1:11	1.02	
мсз	1/13/09 18:29	1/15/09 0:36	30.12	
МСЗ	1/17/09 13:38	1/18/09 15:27	25.82	
MC3	3/5/09 17:54	3/5/09 22:46	4.87	
MC3	3/5/09 22:53	3/5/09 23:56	1.05	
MC3	3/6/09 1:11	3/6/09 4:44	3.55	
MC3	6/15/09 9:09	6/17/09 8:40	47.52	
MC3	6/17/09 8:40	6/18/09 3:43 6/24/09 12:09	19.05	
MC3	6/22/09 22:51 7/7/09 23:28	7/10/09 6:03	37.30	
MC3 MC3	7/10/09 7:30	7/10/09 11:25	54.58 3.92	
MC3	7/17/09 22:45	7/20/09 1:09	50.40	
MC3	7/20/09 17:53	7/20/09 19:32	1.65	
MC3	7/25/09 14:09	7/27/09 8:00	41.85	
MC3	9/24/09 6:03	9/24/09 7:41	1.63	
MC3	9/30/09 2:15	9/30/09 5:25	3.17	
MC3	10/7/09 8:49	10/9/09 6:37	45.80	
мсз	10/15/09 4:04	10/15/09 8:35	4.52	
MC4	11/21/08 17:38	11/21/08 22:00	4.37	
MC4	11/21/08 22:00	11/22/08 3:28	5.47	
MC4	11/22/08 11:19	11/23/08 6:53	19.57	
MC4	12/26/08 2:36	12/29/08 7:45	77.15	
MC4	2/26/09 19:55	2/27/09 12:00	16.08	
MC4	4/28/09 13:54	4/28/09 21:00	7.10	
MC4	4/28/09 22:03	4/29/09 0:24	2.35	
MC4	4/29/09 1:30	4/29/09 12:09	10.65	
MC4	5/1/09 8:26	5/1/09 11:55	3.48	
MC4	5/1/09 23:31	5/4/09 1:31	50.00	
MC4	5/23/09 2:51	5/23/09 6:14	3.38	
MC4	5/23/09 6:19	5/23/09 7:04	0.75	
MC4	6/28/09 0:09	6/28/09 2:33	2 40	
MC4	7/23/09 0:52	7/25/09 1:51	48.98	

MC4

8/21/09 13:10

8/23/09 1:21

36.18

Attachment to Response to LGE AG-1 Question No. 225

		Attach	iment to kesp	onse to LGE AG-1 Question No. 225
Unit	Event	Event	Event	Page 9 of 19
<u>Name</u>	<u>Start</u>	<u>End</u>	Hours	Conroy / Seelye
MC4	9/25/09 21:43	9/29/09 7:12	81.48	
MC4 MC4	10/23/09 22:37	10/25/09 2:29	27.87	
MC4	10/25/09 2:32	10/25/09 3:33	1.02	
WO4	10/20/03 2.32	10/25/03 0:00	1.02	
OF1	10/30/08 9:00	11/15/08 10:00	385.00	
OF1	11/17/08 10:10	11/18/08 10.15	24.08	
OF1	11/21/08 14:00	11/26/08 10:21	116.35	
OF1	12/1/08 8:12	12/1/08 8:21	0.15	
OF1	12/2/08 17:32	12/4/08 9:09	39.62	
OF1	12/6/08 4:05	12/8/08 9:06	53.02	
OF1	12/10/08 9:41	12/11/08 9:14	23.55	
OF1	12/14/08 13:10	12/17/08 14:32	73.37	
OF1	12/21/08 8:50	12/26/08 0:00	111.17	
OF1	12/26/08 0:00	12/31/08 12:00	132.00	
OF1	12/31/08 12:00	1/1/09 0:00	12.00	
OF1	1/1/09 0:00	1/5/09 14:52	110.87	
OF1	1/9/09 6:18	1/15/09 13:51	151.55	
OF1	1/29/09 12:57	2/12/09 0:00	323.05	
OF1	2/12/09 0:00	2/19/09 14:13	182.22	
OF1	2/20/09 14:27	3/23/09 9:28	739.02	
OF1	3/27/09 8:26	3/27/09 8:55	0.48	
OF1	3/29/09 6:20	3/30/09 13:30	31.17	
OF1	4/4/09 9:08	4/13/09 13:14	220.10	
OF1	4/13/09 13:14	4/17/09 12:27	95.22	
OF1	4/22/09 14:08	4/26/09 12:06	93.97	
OF1	5/1/09 9:24	5/6/09 6:00	116.60	
OF1	5/6/09 6:00	5/17/09 7:49	265.82	
OF1	5/25/09 15:58	6/2/09 11:56	187.97	
OF1	6/13/09 10:03	6/17/09 13:13	99.17	
OF1	6/20/09 12:45	6/21/09 6:25	17.67 264.88	
OF1	6/21/09 6:25	7/2/09 7:18 7/6/09 9:52	98.57	
OF1 OF1	7/2/09 7:18 7/8/09 21:02	7/26/09 12:25	423.38	
OF1	7/26/09 12:27	7/26/09 12:52	0.42	
OF1	7/29/09 12:04	7/29/09 13:53	1.82	
OF1	7/31/09 12:33	8/7/09 12:06	167.55	
OF1	8/13/09 9:10	9/1/09 7:30	454.33	
OF1	9/1/09 7:30	9/28/09 7:21	647.85	
OF1	10/6/09 1:10	10/15/09 7:37	222.45	
OF1	10/15/09 17:33	10/16/09 7:48	14.25	
OF1	10/26/09 13:29	10/29/09 10:34	69.08	
OF1	10/30/09 11:48	10/30/09 13:56	2.13	
OF2	8/4/08 6:44	12/11/08 11:05	3,100.35	
OF2	12/11/08 11:05	12/12/08 10:15	23.17	
OF2	12/15/08 9:52	12/17/08 14:05	52.22	
OF2	12/22/08 13:18	12/26/08 0:00	82.70	
OF2	12/26/08 0:00	12/31/08 12:00	132.00	
OF2	12/31/08 12:00	1/1/09 0:00	12.00	
OF2	1/1/09 0:00	1/5/09 14:22	110.37	
OF2	1/9/09 7:10	1/15/09 13:28	150.30	
OF2	1/30/09 7:26	2/12/09 0:00	304.57	
OF2	2/12/09 0:00	2/19/09 13:56	181.93	
OF2	2/20/09 14:17	3/23/09 9:17	739.00	
OF2	3/28/09 9:33	3/29/09 11:20	25.78 26.37	

3/30/09 13:42

3/29/09 11:20

OF2

26.37

Attachment to Response to LGE AG-1 Question No. 225

		Attacr	iment to Resp	onse to LGE AG-1 Question No. 225
Unit	Event	Event	Event	Page 10 of 19
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	Conroy / Seelye
OF2	4/6/09 13:24	4/13/09 13:14	167.83	′
OF2	4/13/09 13:14	4/17/09 12:37	95.38	
OF2	4/25/09 12:09	4/26/09 12:53	24.73	
OF2	5/5/09 13:16	5/6/09 6:00	16.73	
OF2	5/6/09 6:00	5/16/09 9:37	243.62	
OF2	5/30/09 6:07	5/31/09 13:07	31.00	
OF2	6/7/09 18:44	6/8/09 8:55	14.18	
OF2	6/15/09 9:22	6/17/09 7:45	46.38	
OF2	6/20/09 12:28	6/21/09 6:25	17.95	
OF2	6/21/09 6:25	7/2/09 7:18	264.88	
OF2	7/2/09 7:18	7/6/09 8:16	96.97	
OF2	7/9/09 14:16	7/25/09 7:11	376.92	
OF2	7/25/09 16:45	7/26/09 10:35	17.83	
OF2	7/31/09 12:11	8/7/09 11:51	167.67	
OF2	8/10/09 11:59	8/13/09 10:40	70.68	
OF2	8/13/09 10:42	9/1/09 8:30	453.80	
OF2	9/1/09 8:30	9/28/09 8:58	648.47	
OF2	10/9/09 8:45	10/12/09 12:57	76.20	
OF2	10/13/09 3:11	10/15/09 7:03	51.87	
OF2	10/24/09 11:46	10/30/09 13:45	145.98	
OF3	8/18/08 12:25	11/18/08 14:59	2,210.57	
OF3	11/21/08 15:28	11/26/08 17:08	121.67	
OF3	12/1/08 7:53	12/1/08 8:04	0.18	
OF3	12/2/08 18:45	12/4/08 12:51	42.10	
OF3	12/10/08 12:15	12/11/08 8:32	20.28	
OF3	12/14/08 13:16	12/17/08 13:46	72.50	
OF3	12/22/08 9:35	12/26/08 0:00	86.42	
OF3	12/26/08 0:00	12/31/08 12:00	132.00	
OF3	12/31/08 12:00	1/1/09 0:00	12.00	
OF3	1/1/09 0:00	1/5/09 14:03	110.05	
OF3	1/9/09 9:37	1/15/09 10:57	145.33	
OF3	1/30/09 7:32	2/12/09 0:00	304.47	
OF3	2/12/09 0:00	2/19/09 14:15	182.25	
OF3	2/19/09 14:15	2/20/09 11:33	21.30	
OF3	3/28/09 6:34	3/29/09 11:20	28.77	
OF3	3/29/09 11:20	3/30/09 12:47	25.45	
OF3	4/6/09 13:29	4/9/09 10:45	69.27	
OF3	4/13/09 6:12	4/17/09 10:08	99.93	
OF3	4/25/09 12:14	4/26/09 13:08	24.90	
OF3	5/6/09 5:43	5/16/09 9:37	243.90	
OF3	5/16/09 9:37	5/20/09 12:55	99.30	
OF3	5/30/09 6:11	5/31/09 10:04	27.88	
OF3	6/15/09 9:33	6/16/09 12:09	26.60	
OF3	6/21/09 6:27	7/2/09 7:18	264.85	
OF3	7/2/09 7:18	7/6/09 7:27	96.15	
OF3	7/9/09 12:16	7/25/09 6:53	378.62	
OF3	7/25/09 16:48	7/26/09 10:11	17.38	
OF3	7/31/09 12:28	8/4/09 7:16	90.80	
OF3	8/4/09 19:13	8/6/09 14:02	42.82	
OF3	8/17/09 7:24	8/19/09 12:00	52.60	
OF3	8/19/09 12:00	8/20/09 13:13	25.22	
OF3	8/20/09 13:18	8/21/09 7:39	18.35	
OF3	8/21/09 7:42	9/1/09 9:30	265.80	
OF3	9/1/09 9:30	9/8/09 7:23	165.88	
OF3	0/40/00 0:33	0/01/00 1:26	73.00	

9/21/09 9:45

9/18/09 8:32

OF3

73.22

Attachment to Response to LGE AG-1 Question No. 225

		Attaci	ment to respe	Page 11 of 10
Unit	Event	Event	Event	Page 11 of 19
<u>Name</u>	<u>Start</u>	End	<u>Hours</u>	Conroy / Seelye
OE3	0/21/00 18:55	9/25/09 6:50	83.92	
OF3 OF3	9/21/09 18:55 10/6/09 4:15	10/9/09 6:42	74.45	
OF3	10/10/09 11:52	10/15/09 9:01	117.15	
OF3	10/27/09 7:30	10/28/09 13:18	29.80	
013	10/2/103 7:30	10/20/03 10:10	25.00	
OF4	11/6/08 10:50	11/7/08 11:48	24.97	
OF4	11/8/08 8:06	11/14/08 14:13	150.12	
OF4	11/15/08 16:07	11/16/08 10:47	18.67	
OF4	11/17/08 6:12	11/18/08 8:53	26.68	
OF4	11/20/08 13:39	11/20/08 15:13	1.57	
OF4	11/21/08 16:52	11/26/08 8:20	111.47	
OF4	12/1/08 7:28	12/1/08 7:44	0.27	
OF4	12/2/08 16:20	12/3/08 12:45	20.42	
OF4	12/6/08 6:02	12/8/08 9:17	51.25	
OF4	12/9/08 6:49	12/9/08 11:30	4.68	
OF4	12/10/08 12:55	12/11/08 8:24	19.48	
OF4	12/18/08 10:05	12/18/08 13:46	3.68	
OF4	12/25/08 10:15	12/26/08 0:00	13.75	
OF4	12/26/08 0:00	12/31/08 12:00	132.00	
OF4	12/31/08 12:00	1/1/09 0:00	12.00	
OF4	1/1/09 0:00	1/2/09 14:12	38.20	
OF4	1/9/09 13:13	1/15/09 10:28	141.25	
OF4	1/30/09 12:39	2/2/09 13:30	72.85	
OF4	2/2/09 13:30	2/3/09 13:09	23.65	
OF4	2/11/09 8:09	2/12/09 0:00	15.85	
OF4	2/12/09 0:00	2/19/09 10:20	178.33	
OF4	3/29/09 11:21	3/30/09 12:32	25.18 66.15	
OF4	4/6/09 13:35 4/13/09 7:07	4/9/09 7:44 4/16/09 12:07	66.15 77.00	
OF4 OF4	4/16/09 13:11	4/17/09 9:25	20.23	
OF4	4/26/09 9:07	4/26/09 13:27	4.33	
OF4	5/6/09 8:43	5/16/09 7:52	239.15	
OF4	5/30/09 6:14	5/31/09 12:00	29.77	
OF4	5/31/09 12:00	6/4/09 18:39	102.65	
OF4	6/15/09 10:33	6/16/09 9:07	22.57	
OF4	6/21/09 6:34	7/1/09 16:22	249.80	
OF4	7/9/09 17:34	7/13/09 7:22	85.80	
OF4	7/13/09 19:19	7/14/09 10:08	14.82	
OF4	7/17/09 12:09	7/22/09 8:56	116.78	
OF4	7/31/09 12:23	8/4/09 6:55	90.53	
OF4	8/4/09 19:14	8/6/09 13:36	42.37	
OF4	8/17/09 8:00	8/19/09 7:30	47.50	
OF4	8/19/09 7:30	8/19/09 11:59	4.48	
OF4	8/22/09 4:48	8/23/09 10:57	30.15	
OF4	8/27/09 20:34	8/31/09 10:25	85.85	
OF4	9/1/09 14:02	9/25/09 7:10	569.13	
OF4	9/25/09 23:14	9/28/09 6:43	55.48	
OF4	10/5/09 21:06	10/9/09 8:38	83.53	
OF4	10/10/09 11:54	10/12/09 12:39	48.75	
OF4	10/13/09 8:46	10/15/09 10:03	49.28	
OF4	10/27/09 7:35	11/4/09 13:23	197.80	
OF5	7/13/08 11:00	1/1/09 0:00	4,117.00	
OF6	11/8/08 23:07	11/9/08 10:39	11.53	
OF6	11/18/08 10:34	11/24/08 17:17	150.72	

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Unit	Event	Event	Event	Conroy / Seelye
<u>Name</u>	Start	End	<u>Hours</u>	comby / Seeiye
OF6	12/10/08 13:00	12/11/08 11:01	22.02	
OF6	12/18/08 10:00	12/18/08 13:24	3.40	
OF6	12/25/08 22:06	12/31/08 11:55	133.82	
OF6	1/9/09 14:21	1/14/09 15:45	121.40	
OF6	1/14/09 16:16	1/20/09 13:14	140.97	
OF6	1/21/09 1:24	1/21/09 9:16	7.87	
OF6	1/30/09 14:49	2/2/09 14:32	71.72	
OF6	2/11/09 13:20	2/12/09 0:00	10.67	
OF6	2/12/09 0:00	2/18/09 13:50	157.83	
OF6	3/23/09 9:45	3/23/09 10:28	0.72	
OF6	3/30/09 6:49	3/30/09 10:34	3.75	
OF6	4/2/09 21:18	4/3/09 9:44	12.43	
OF6	4/13/09 7:10	4/16/09 8:48	73.63	
OF6	4/28/09 22:17	4/29/09 12:25	14.13	
OF6	5/6/09 8:47	5/18/09 7:16	286.48	
OF6	5/18/09 13:07	5/18/09 13:44	0.62	
OF6	5/30/09 7:18	5/31/09 7:36	24.30	
OF6	6/1/09 10:05	6/1/09 12:39	2.57	
OF6	6/15/09 10:36	6/16/09 7:15	20.65	
OF6	6/20/09 6:31	7/29/09 15:37	945.10	
OF6	7/29/09 15:39	7/30/09 10:00	18.35	
OF6	7/30/09 10:48	7/30/09 12:23	1.58	
OF6	7/30/09 12:33	7/30/09 12:49	0.27	
OF6	7/30/09 13:56	7/31/09 7:39	17.72	
OF6	7/31/09 9:20	7/31/09 9:41	0.35	
OF6	8/1/09 7:01	8/3/09 11:52	52.85	
OF6	8/4/09 23:53	8/6/09 12:49	36.93	
OF6	8/17/09 7:56	8/17/09 13:22	5.43	
OF6	8/23/09 3:50	8/24/09 9:17	29.45	
OF6	8/28/09 8:28	8/31/09 9:42	73.23	
OF6	9/5/09 12:00	9/8/09 9:15	69.25	
OF6	9/18/09 12:32	9/21/09 9:25	68.88	
OF6	10/10/09 11:31	10/12/09 14:00	50.48	
OF6	10/12/09 14:00	10/14/09 11:00	45.00	
OF6	10/14/09 11:00	10/16/09 10:48	47.80	
OF6	10/27/09 7:51	10/27/09 13:27	5.60	
OF7	1/1/08 0:00	1/31/08 14:07	734.12	
OF7	11/5/08 10:03	11/5/08 10:57	0.90	•
OF7	11/6/08 16:42	11/7/08 7:54	15.20	
OF7	11/12/08 11:37	11/14/08 11:09	47.53	
OF7	12/3/08 13:35	12/3/08 14:04	0.48	
OF7	12/9/08 12:57	12/9/08 14:30	1.55	
OF7	12/11/08 11:10	12/11/08 11:37	0.45	
OF7	12/17/08 21:57	12/18/08 7:00	9.05	
OF7	12/18/08 7:00	12/24/08 10:52	147.87	
OF7	12/25/08 21:54	12/31/08 11:37	133.72	
OF7	1/9/09 14:19	1/14/09 15:30	121.18	
OF7	1/14/09 15:30	1/16/09 13:05	45.58	
OF7	1/30/09 14:46	2/2/09 10:52	68.10	
OF7	2/6/09 0:30	2/6/09 8:50	8.33	
OF7	2/11/09 13:15	2/12/09 0:00	10.75	
OF7	2/12/09 0:00	2/18/09 14:21	158.35	
OF7	2/20/09 9:50	2/20/09 10:51	1.02	
OF7	3/19/09 11:14	3/19/09 12:07	0.88	

4.08

3/30/09 6:47

3/30/09 10:52

OF7

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Conroy / Seelye

Unit <u>Name</u>	Event <u>Start</u>	Event <u>End</u>	Event <u>Hours</u>
OF7	4/6/09 11:42	4/6/09 13:18	1.60
OF7	4/13/09 13:12	4/16/09 8:55	67.72
OF7	4/22/09 9:25	4/24/09 12:55	51.50
OF7	5/1/09 8:39	5/1/09 9:39	1.00
OF7	5/2/09 8:53	5/2/09 14:30	5.62
OF7	5/2/09 14:30	5/4/09 7:33	41.05
OF7	5/6/09 12:10	5/16/09 10:56	238.77
OF7	5/22/09 12:16	5/22/09 14:04	1.80
OF7	5/22/09 14:05	5/22/09 14:26	0.35
OF7	5/30/09 7:22	5/31/09 7:18	23.93
OF7	6/1/09 9:24	6/1/09 12:58	3.57
OF7	6/15/09 10:38	6/16/09 6:45	20.12
OF7	6/16/09 23:28	6/17/09 7:30	8.03
OF7	6/21/09 11:26	7/2/09 7:18	259.87
OF7	7/9/09 0:36	7/9/09 12:12	11.60
OF7	7/13/09 14:55	7/14/09 9:16	18.35
OF7	7/17/09 16:56	7/20/09 6:53	61.95
OF7	7/21/09 23:34	7/22/09 9:00	9.43
OF7	7/22/09 9:00	7/22/09 10:35	1.58
OF7	7/26/09 9:31	7/26/09 9:45	0.23
OF7	7/31/09 14:34	8/3/09 12:35	70.02
OF7	8/4/09 23:13	8/6/09 7:14	32.02
OF7	8/17/09 7:50	8/17/09 12:45	4.92
OF7	8/28/09 12:33	8/31/09 6:58	66.42
OF7	9/18/09 10:00	9/21/09 8:22	70.37
OF7	10/10/09 11:34	10/12/09 8.00	44.43
OF7	10/12/09 8:00	11/12/09 16:46	752.77
OF8	8/8/08 11:44	11/18/08 11:45	2,448.02
OF8	12/25/08 18:51	12/31/08 12:00	137.15
OF8	12/31/08 12:00	1/1/09 0:00	12.00
OF8	1/1/09 0:00	1/2/09 11:28	35.47
OF8	1/9/09 14:16	1/14/09 15:30	121.23
OF8	1/14/09 15:30	1/15/09 11:25	19.92
OF8	1/30/09 12:47	2/2/09 10:23	69.60
OF8	2/11/09 13:11	2/12/09 0:00	10.82
OF8	2/12/09 0.00	2/19/09 11:00	179.00
OF8	2/25/09 17:22	2/27/09 10:00	40.63
OF8	3/30/09 6:39	3/30/09 11:11	4.53
OF8	4/13/09 13:14	4/16/09 10:20	69.10
OF8	5/6/09 12:14	5/16/09 7:19	235.08
OF8	5/30/09 7:25	5/31/09 7:02	23.62
OF8	6/1/09 8:47	6/1/09 13:27	4.67
OF8	6/15/09 10:40	6/16/09 7:35	20.92
OF8	6/21/09 11:28	7/2/09 7:18	259.83
OF8	7/2/09 7:18	7/6/09 12:34	101.27
OF8	7/8/09 22:18	7/10/09 9:42	35.40
OF8	7/11/09 20:12	7/22/09 11:15	255.05
OF8	8/1/09 7:08	8/3/09 12:18	53.17
OF8	8/4/09 19:16	8/6/09 8:36	37.33
OF8	8/17/09 7:37	8/17/09 12:29	4.87
OF8	8/28/09 6:43	8/31/09 9:00	74.28
OF8	9/1/09 13:07	9/21/09 7:07	474.00
OF8	10/10/09 11:46	10/12/09 12:03	48.28
OF8	10/14/09 6:49		5.45
OF8	10/26/09 7:33	10/26/09 12:15	4.70

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		Attaci	michie to nes
Unit	Event	Event	Event
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>
OF8	10/27/09 7:55	10/27/09 13:49	5.90
010	10/2/105 7:33	10/2/105 13.45	3.90
PR11	2/4/09 6:25	2/4/09 12:07	5.70
PR11	5/15/09 9:58	5/15/09 11:05	1.12
PR11	6/1/09 9:00	6/2/09 10:00	25.00
PR11	9/8/09 8:21	9/8/09 13:06	4.75
PR11	9/14/09 16:16	9/15/09 10:00	17.73
PR12	2/4/09 6:25	2/6/09 9:00	50.58
PR12	5/12/09 8:00	5/12/09 9:33	1.55
PR12	5/14/09 7:36	5/14/09 14:14	6.63
PR12	7/27/09 8:32	7/27/09 18:10	9.63
PR12	9/14/09 16:16	9/15/09 12:59	20.72
PR13	10/31/08 7:00	10/31/08 14:10	7.17
PR13	12/13/08 7:40	12/13/08 9:55	2.25
PR13	1/28/09 3:22	1/28/09 8:50	5.47
PR13	3/24/09 12:30	3/24/09 14:00	1.50
PR13	6/24/09 1:00	6/26/09 19:30	66.50
PR13	6/30/09 6:21	6/30/09 12:30	6.15
PR13	7/1/09 8:15	7/1/09 8:40	0.42
PR13	7/6/09 7:20	7/6/09 11:50	4.50
PR13	7/15/09 9:00	7/15/09 12:00	3.00
PR13	7/16/09 6:35	7/16/09 7:30	0.92
PR13	8/4/09 8:42	8/5/09 12:30	27.80
PR13	9/17/09 7:16	9/17/09 13:53	6.62
PR13	9/21/09 14:23	9/25/09 9:54	91.52
PR13	10/20/09 12:27	10/20/09 12:36	0.15
TC1	12/5/08 22:07	12/6/08 8:20	10.22
TC1	12/6/08 10:12	12/6/08 14:38	4.43
TC1	12/12/08 23:34	12/14/08 23:19	47.75
TC1	12/14/08 23:19	12/15/08 12:05	12.77
TC1	1/7/09 1:43	1/7/09 3:04	1.35
TC1	2/8/09 10:38	2/8/09 15:47	5.15
TC1	2/9/09 13:58	2/10/09 12:30	22.53
TC1	2/10/09 12:30	2/12/09 3:48	39.30
TC1	2/12/09 5:17	2/12/09 5:45	0.47
TC1	2/28/09 20:34	3/6/09 17:17	140.72
TC1	3/6/09 18:16	3/6/09 18:55	0.65
TC1	3/6/09 19:05	3/6/09 20:32	1.45
TC1	3/27/09 23:25	3/28/09 22:23	22.97
TC1	3/28/09 22:23	3/29/09 6:21	7.97
TC1	4/24/09 23:27	4/25/09 22:29	23.03
TC1	4/30/09 23:16	5/2/09 22:09	46.88
TC1	5/2/09 22:17	5/2/09 22:53	0.60
TC1	5/3/09 1:31	5/3/09 2:10	0.65
TC1	5/3/09 3:00	5/3/09 4:04	1.07
TC1	5/29/09 23:19	5/31/09 9:31	34.20
TC1	6/3/09 1:03	6/3/09 16:23	15.33
TC1	6/9/09 3:28	6/9/09 4:03	0.58
TC1	7/11/09 0:42	7/13/09 0:00	47.30
TC1	7/13/09 0:00	7/13/09 9:23	9.38
TC1	8/11/09 19:02	8/12/09 20:47	25.75
TC1	8/12/09 20:47	8/13/09 3:22	6.58
TC1	8/13/09 3:22	8/13/09 20:34	17.20

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Unit	Event	Event	Event	
<u>Name</u>	<u>Start</u>	<u>End</u>	<u>Hours</u>	
TC1	8/17/09 14:52	8/17/09 15:23	0.52	
TC1	8/26/09 12:36	8/28/09 2:00	37.40	
TC1	9/8/09 7:12	9/9/09 6:54	23.70	
TC1	9/25/09 21:55	9/25/09 22:25	0.50	
TC5	2/19/09 9:00	2/19/09 13:36	4.60	
TC5	4/27/09 10:54	4/27/09 11:26	0.53	
TC5	5/22/09 3:15	5/22/09 16:28	13.22	
TC5	6/5/09 8:30	6/5/09 13:30	5.00	
TC5	8/5/09 7:00	8/5/09 14:00	7.00	
TC5	8/22/09 2:30	8/22/09 16:52	14.37	
TC5	10/6/09 3:30	10/6/09 15:00	11.50	
TOO	12/4/08 7:00	12/5/09 12:05	20.00	
TC6 TC6	12/16/08 9:16	12/5/08 13:05 12/16/08 10:17	30.08 1.02	
TC6	12/16/08 17:54	12/16/08 10:17	3.40	
TC6	12/19/08 7:11	12/19/08 8:08	0.95	
TC6	12/22/08 7:20	12/22/08 7:43	0.38	
TC6	12/30/08 7:15	12/30/08 8:57	1.70	
TC6	1/9/09 4:00	1/10/09 2:25	22.42	
TC6	1/14/09 7:30	1/14/09 16:00	8.50	
TC6	2/17/09 5:57	2/17/09 6:27	0.50	
TC6	2/19/09 8:15	2/19/09 13:36	5.35	
TC6	2/26/09 4:00	2/26/09 16:21	12.35	
TC6	4/6/09 21:53	4/6/09 23:55	2.03	
TC6	4/9/09 2:00	4/24/09 18:54	376.90	
TC6	4/24/09 19:01	4/25/09 9:00	13.98	
TC6	4/27/09 10:47	4/28/09 7:31	20.73	
TC6	5/22/09 3:15	5/22/09 16:28	13.22	
TC6	5/28/09 6:15	5/28/09 15:11	8.93	
TC6	7/10/09 13:14	7/10/09 16:39	3.42	
TC6	8/5/09 7:00	8/5/09 14:00 8/22/09 16:52	7.00 14.37	
TC6	8/22/09 2:30	0/22/09 10.52	14.57	
TC7	12/22/08 12:10	12/22/08 21:10	9.00	
TC7	5/22/09 3:15	5/22/09 16:28	13.22	
TC7	7/2/09 6:20	7/2/09 13:40	7.33	
TC7	8/6/09 7:00	8/6/09 14:00	7.00	
TC7	8/10/09 12:45	8/10/09 14:07	1.37	
TC7	8/21/09 7:00	8/21/09 10:30	3.50	
TC7	8/21/09 10:30	8/22/09 16:52	30.37	
TC7	8/31/09 6:38	8/31/09 12:20	5.70	
TC7	9/6/09 6:56	9/6/09 10:05	3.15	
TC8	12/22/08 7:20	12/22/08 21:10	13.83	
TC8	3/2/09 6:15	3/2/09 7:40	1.42	
TC8	4/27/09 10:54	4/27/09 11:26	0.53	
TC8	5/29/09 4:00	5/29/09 19:50	15.83	
TC8	7/27/09 6:30	7/27/09 15:34	9.07	
TC8	8/6/09 7:00 10/19/09 5:43	8/6/09 14:00 10/19/09 6:17	7.00 0.57	
TC8 TC8	10/19/09 5:43	10/19/09 6:55	0.63	
100	10/13/03 0.1/	10/10/00 0,00	0.00	
TC9	12/22/08 5:30	12/22/08 10:53	5.38	
TC9	3/12/09 7:30	3/12/09 15:40	8.17	
TC9	4/2/09 7:00	4/2/09 12:20	5.33	

Attachment to Response to LGE AG-1 Question No. 225

	Unit	Event	Event	Event	Page 16 of 19
	<u>Name</u>	<u>Start</u>	End	<u>Hours</u>	Conroy / Seelye
	TC9	5/27/09 6:20	5/27/09 9:30	3.17	
	TC9	5/29/09 4:00	5/29/09 18:11	14.18	
	TC10	12/5/08 23:08	12/6/08 7:30	8.37	
	TC10	12/22/08 5:30	12/22/08 10:53	5.38	
	TC10	2/5/09 0:55	2/5/09 8:30	7.58	
	TC10	2/16/09 7:30	2/16/09 16:02	8.53	
	TC10	2/23/09 15:20	2/23/09 19:34	4.23	
	TC10	5/5/09 1:30	5/5/09 13:19	11.82	
	TC10	5/15/09 13:04	5/18/09 12:41	71.62	
	TC10	5/29/09 4:00	5/29/09 18:11	14.18	
	TC10	6/26/09 11:29	6/26/09 13:35	2.10	
	TC10	7/17/09 6:15	7/17/09 14:00	7.75	
	TC10	7/30/09 12:20	7/30/09 12:46	0.43	
	TC10	10/28/09 14:30	10/29/09 13:45	23.25	-
	TY3	12/14/08 6:15	12/14/08 12:20	6.08	
	TY3	12/15/08 3:56	12/15/08 7:05	3.15	
	TY3	12/19/08 11:49	12/21/08 9:07	45.30	
	TY3	12/22/08 22:07	12/24/08 12:30	38.38	
	TY3	1/29/09 4:40	1/29/09 23:25	18.75	
,	TY3	1/30/09 14:46	2/1/09 14:45	47.98	
	TY3	2/3/09 9:20	2/13/09 0:57	231.62	
	Z 1	1/16/09 6:51	6/1/09 2:00	3,259.15	

Conroy / Seelye

Unit log for

Dix Hydro 01

Start date	Stop Time	Lake Level Stop	Duration
10/27/2009	09:07	732.89	10:19:00
10/27/2009	19:35	732.81	12:06:00
10/26/2009	20:00	733.11	11:53:00
10/24/2009	16:16	734.01	9:33:00
10/23/2009	21:08	734.16	0:49:00
10/23/2009	20:11	734.16	2:18:00
10/23/2009	17:44	734.13	11:48:00
10/22/2009	16:00	734.58	10:15:00
10/21/2009	16:49	734.95	3:16:00
06/05/2009	12:13	737.01	3026:43:00
05/28/2009	12:12	741.96	5:12:00
05/27/2009	07:00	742	16:00:00
05/27/2009	15:00	741.95	1:06:00
05/15/2009	22:55	749.65	7:43:00
05/08/2009	19:08	748.1	5:21:00
05/06/2009	11:25	746.2	49:30:00
04/10/2009	07:36	737.5	19:09:00
03/26/2009	13:40	732.17	194:12:00
03/25/2009	12:46	726.1	3:57:00
03/06/2009	10:25	729.92	235:51:00
02/03/2009	13:21	744.16	2:32:00
01/28/2009	10:49	743.99	134:00:00
01/28/2009	20:34	734.84	4:42:00
01/20/2009	13:30	723.74	3:00:00
01/19/2009	14:20	723.59	3:20:00
01/09/2009	14:02	728.61	0:30:00

Unit log for

Dix Hydro 02

Page 18 of 19 Conroy / Seelye

Start date	Stop Time	Lake Level Stop	Duration
			Duration 11:17:00
10/27/2009	18:43	732.85	11:17:00
10/26/2009	20:01	733 1	9:21:00
10/24/2009	16:03	734.01	
10/23/2009	16:35	734.16	10:43:00
10/22/2009	15:36	734.58	9:45:00
10/21/2009	16:07	735.03	2:19:00
10/09/2009	11:57	736.94	2:12:00
09/29/2009	10:14	740.16	0:06:00
09/26/2009	12:45	737.35	0:33:00
08/31/2009	06:38	739_11	14:51:00
08/16/2009	11:46	741.44	24:21:00
07/28/2009	09:54	739.04	0:57:00
07/17/2009	08:43	739.71	1:33:00
07/15/2009	07:40	739.9	1:00:00
07/10/2009	09:00	740.65	1:43:00
06/26/2009	06:41	743.09	0:33:00
06/26/2009	06:08	743.16	1:59:00
06/25/2009	13:55	743.5	3:31:00
06/22/2009	13:57	744.3	4:13:00
06/18/2009	14:50	741.75	4:45:00
06/16/2009	21:36	743.28	5:19:00
06/15/2009	06:04		14:15:00
06/10/2009	05:38	742.67	42:04:00
06/10/2009	11:34	740.65	0:14:00
06/10/2009	11:20	740.61	1:06:00
05/28/2009	12:28	742	5:28:00
05/27/2009	07:00	742	16:00:00
05/27/2009	15:00	741.95	1:09:00
05/15/2009	22:55	749.65	7:02:00
05/08/2009	19:06	748.1	5:21:00
05/06/2009	11:26	746.24	49:31:00
04/10/2009	07:40	737.5	19:13:00
03/25/2009	12:54	726.1	4:07:00
03/24/2009	14:47	726.51	7:52:00
03/10/2009	10:25	729.89	148:55:00
01/30/2009	05:30	727.86	929:32:00
01/28/2009	13:40	741.47	16:53:00
01/28/2009	20:21	734.84	4:30:00
01/27/2009	13:55	723.74	0:35:00
01/20/2009	13:30	723.74	3:00:00

Attachment to Response to LGE AG-1 Question No. 225

Page 19 of 19			Dix Hydro 03	Unit log for	
Conroy / Seelye					
		Lake			
		Level	Stop	Start	
	Duration	Stop	Time	date	
	7235:36:00	727.31	00:00	03/05/2009	
	20:07:00	744.06	15:12	02/02/2009	
	17:00:00	741.31	13:45	01/28/2009	
	4:23:00	734.84	20:14	01/28/2009	
	19:42:00	727.49	08:45	01/27/2009	
	146:49:00	723.8	13:19	01/20/2009	

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 226

Responding Witnesses: Robert M. Conroy/William Steven Seelye

- Q-226. Please identify and explain any events or circumstance occurring during the test year that materially (significantly) altered the normal (typical) economic dispatch of LG&E's and KU's electric Production resources (if any).
- A-226. Besides the forced and maintenance outages identified in the response to Question No. 225, along with planned outages, the Company is unaware of any events or circumstances occurring during the test year that materially altered the economic dispatch of the generation resources.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 227

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-227. For each KU and LG&E generating unit, please provide average annual fuel cost per KWH during test year.
- A-227. See attached.

Louisville Gas and Electric Company Case No. 2009-00549 Average Annual Fuel Cost per kWh During Test Year KU and LG&E Units

	Average Test Year Fuel		
Unit		Cost	
KU			
Steam Units			
Tyrone 3	\$	0.04470	/ kwh
Green River 3	\$	0.03403	
Green River 4	\$	0.03171	/ kwh
Brown 1	\$	0.03591	
Brown 2	\$	0.03260	/ kwh
Brown 3	\$	0.03271	/ kwh
Ghent 1	\$	0.02587	/ kwh
Ghent 2	\$	0.03021	
Ghent 3	\$	0.02746	/ kwh
Ghent 4	\$	0.02741	/ kwh
Combustion Turbines			
Haefling I	\$	0.31514	/ kwh
Haefling 2	\$	0.30781	/ kwh
Haefling 3	\$	0.26731	/ kwh
Brown 5	\$	0.19650	/ kwh
Brown 6	\$	0.07655	/ kwh
Brown 7	\$	0.09322	/ kwh
Brown 8	\$	0.09633	/ kwh
Brown 9	\$	0.17128	/ kwh
Brown 10	\$	0.16616	/ kwh
Brown 11	\$	0.12604	/ kwh
Paddys Run 13	\$	0.97551	/ kwh
•			
Trimble County 5	\$	0.11193	/ kwh
Trimble County 6	\$	0.11372	/ kwh
Trimble County 7	\$	0.10787	/ kwh
Trimble County 8	\$	0.15249	/ kwh
Trimble County 9	\$	0.12513	
Trimble County 10	\$	0.13079	
•			

Louisville Gas and Electric Company Case No. 2009-00549 Average Annual Fuel Cost per kWh During Test Year KU and LG&E Units

Unit	Average Test Year Fuel Cost		
LGE			
Steam Units			
Cane Run 4	\$	0.02025	/ kwh
Cane Run 5	\$	0.01955	/ kwh
Cane Run 6	\$	0.01976	/ kwh
Mill Creek 1	\$	0.01970	/ kwh
Mill Creek 2	\$	0.02002	/ kwh
Mill Creek 3	\$	0.01975	/ kwh
Mill Creek 4	\$	0.01937	/ kwh
Trimble County *	\$	0.02151	/ kwh
Combustion Turbines			
Cane Run CT	\$	0.30320	/ kwh
Paddy's Run 11 & 12	\$	4.95855	/ kwh
Paddy's Run 13	\$	0.97265	/ kwh
Trimble County 5	\$	0.11193	/ kwh
Trimble County 6	\$	0.11372	/ kwh
Trimble County 7	\$	0.10788	/ kwh
Trimble County 8	\$	0.15254	/ kwh
Trimble County 9	\$	0.12513	/ kwh
Trimble County 10	\$	0.13081	/ kwh
Brown 5	\$	0.12545	/ kwh
Brown 6	\$	0.07617	/ kwh
Brown 7	\$	0.09180	/ kwh
Waterside CT	\$	-	/ kwh
Zorn CT	\$	0.10287	/ kwh

^{*} Trimble County steam fuel costs represent 100% of fuel expense and generation

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 228

- Q-228. Please specifically explain and define how LG&E distinguishes between primary and secondary voltage; e.g., voltage level.
- A-228. Primary and secondary voltages are shown on the proposed P.S.C Electric No. 8, Original Sheet No. 99, as provided in Tab 8, Volume I of the Statutory Notice, Application, Financial Exhibit, Table of Contents, Filing Requirements filed with the Commission on January 29, 2010.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 229

- Q-229. Please provide a copy of the most recent LG&E class load study including all supporting tables, schedules, and data.
- A-229. See attached CD in the folder titled Question No. 229.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 230

Responding Witness: William Steven Seelye

- Q-230. Please provide all workpapers, analyses, calculations, etc. supporting all LG&E non-jurisdictional and jurisdictional class demands (loads) utilized in the jurisdictional and class cost of service studies. In this response, please explain and indicate how class demands were specifically determined or estimated. Include all definitions of demand utilized; e.g., CP, NCP and sum of individual customers. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-230. LG&E's class load profiles were developed based on interval data from its load research survey. Simple and stratified random sampling techniques were utilized to develop class load profiles for the majority of the residential and commercial classes. Census samples were utilized to develop class load profiles for most of the industrial classes. After the class profiles were developed initially, they were reviewed and adjusted to ensure that (a) the annual sum of demands for a given class was consistent with the annual total of sales for the class (per the LG&E CIS/CCS system) and (b) the sum of class demands for a given hour equaled the LG&E system demand for that hour.

The requested information is included on the attached CD with these responses, in a folder titled Question No. 230.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 231

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-231. For each LG&E substation dedicated to specific native load customer(s) or non-native load customer(s), please identify each substation and the type of dedicated customer served by the substation; i.e., rate schedules, customer name, and non-jurisdictional/jurisdictional.
- A-231. None of LG&E's substations are dedicated to specific customers. The table below provides the requested information for LG&E substations currently serving single customers.

			Jurisaictionai/Non-
SubID	Plan	Plan Description	Jurisdictional
FD TR1	693	Industrial TOD Service, Primary	Jurisdictional
FD TR2	693	Industrial TOD Service, Primary	Jurisdictional

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 232

Responding Witnesses: Shannon L. Charnas/W. Steven Seelye

- Q-232. Please explain in detail and itemize individual "Property Taxes" and "Other Taxes" included in LG&E Seelye Exhibit 24, Page 25.
- A-232. Property Taxes and Other Taxes include the following components:

Property Tax	\$ 11,329,972
Other Taxes	
Federal & State Unemployment	\$ 165,320
FICA	5,741,416
PSC Fee	1,295,026
Miscellaneous	36,859
Total Other Taxes	\$ 7,238,621
Total Property and Other Taxes	\$ 18,568,593

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 233

Responding Witnesses: William Steven Seelye

Q-233. Please provide details for "Miscellaneous Service Revenues" totaling \$963,922 in LG&E Seelye Exhibit 24, Page 27.

A-233.

Reconnect Charges	\$ 921,472	
Temporary Services	20,205	
Other Service Revenue	22,245	
Total Misc Service Revenues	\$ 963,922	

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 234

- Q-234. Please provide details for "Rent From Electric Property" totaling \$2,613,870 in LG&E Seelye Exhibit 24, Page 37.
- A-234. The following is a breakdown of "Rent From Electric Property":

CATV Attachment	\$	428,730
Rent from Fiber Optics		31,222
Rent from land, building space, structures,		
transformers, cell site attachments and other	<u>2</u> ,	<u>153,918</u>
Total	<u>\$2</u> ,	613,870

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 235

- Q-235. Please explain how interruptible (curtailment riders: CSR1, CSR2, and CSR3) customers' demands and energy usage are reflected in the LG&E class cost of service study.
- A-235. Curtailable customers' actual energy usages were used to develop the energy allocation factors. The customers' CP demands are adjusted to reflect levels that would have occurred had the customers not been curtailed, as applicable.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 236

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-236. With regard to LG&E's current Curtailment Service Rider 1 ("CSR1"), please provide the following amounts by rate schedule, separated between Primary and Transmission, for each month of the test year:
 - (a) number of customers;
 - (b) total firm contract demand;
 - (c) total contract curtailment load;
 - (d) total billing demand;
 - (e) total demand credits;
 - (f) total non-compliance charges by month; and,
 - (g) listing of date, time, duration, and estimated MW curtailment.

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

- A-236. (a) (f) See attached. Also see attached CD, in folder titled Question No. 236 for the Microsoft Excel version of the attachment.
 - (g) See attached.

Louisville Gas and Electric Company

Case No. 2009-00549

Curtailment Service Rider 1 (CSR1) - Primary For the Test Year Ending October 31, 2009

		Total Firm	Total	Total Basic	Total Peak		Tot	al Non-
	Number of	Contract	Contract	Billing	Billing	Total Demand		npliance
	Customers	Demand	Curtailment	Demand	Demand	Credits (\$)		rges (\$)
		(kW)	Load (kW)	(kW)	(kW)		Clia	iiges (a)
	(a)	(b)	(c)	(d)	(d)	(e)		(f)
Nov-08	1	3,000	0	43,238	43,238	\$ (128,761.60)	\$	-
Dec-08	1	3,000	0	33,024	33,024	\$ (96,076.80)	\$	-
Jan-09	1	3,000	0	41,088	40,934	\$ (121,881.60)	\$	-
Feb-09	1	3,000	0	42,317	42,163	\$ (190,406.62)	\$	-
Mar-09	0	3,000	0	0	0	\$ -	\$	-
Apr-09	1	3,000	0	42,317	42,317	\$ (204,447.36)	\$	-
May-09	1	3,000	0	42,163	42,163	\$ (162,918.91)	\$	-
Jun-09	2	3,000	0	39,475	43,085	\$ (248,352.00)	\$	-
Jul-09	1	3,000	0	31,027	31,027	\$ (145,741.44)	\$	-
Aug-09	1	3,000	0	32,870	32,870	\$ (155,326.08)	\$	•
Sep-09	1	3,000	0	32,947	32,947	\$ (155,725.44)	\$	-
Oct-09	1	3,000	0	33,024	33,024	\$ (156,124.80)	\$	-

Attachment to Response to LGE AG-1 Question No. 236 (a-f) Page 2 of 2 Conroy/Seelye

Louisville Gas and Electric Company

Case No. 2009-00549

Curtailment Service Rider 1 (CSR1) - Transmission For the Test Year Ending October 31, 2009

	Number of Customers	Total Firm Contract Demand (kW) (b)	Total Contract Curtailment Load (kW) (c)	Total Basic Billing Demand (kW) (d)	Total Peak Billing Demand (kW) (d)	Total Demand Credits (\$)	Co	tal Non- mpliance arges (\$)
Nov-08	1	3,000	0	30,528	30,528	\$ (63,636.80)	\$	-
Dec-08	1	3,000	0	30,912	30,528	\$ (64,827.20)		-
Jan-09	1	3,000	0	28,224	28,224	\$ (56,494.40)	\$	-
Feb-09	0	3,000	0	0	0	\$ -	\$	_
Mar-09	2	3,000	0	44,823	44,899	\$ (66,369.37)	\$	-
Apr-09	0	3,000	0	0	0	\$ -	\$	-
May-09	2	3,000	0	65,042	64,797	\$ (229,714.71)	\$	-
Jun-09	1	3,000	0	13,540	13,540	\$ (14,606.40)	\$	-
Jul-09	1	3,000	0	31,216	31,152	\$ (98,817.60)	\$	-
Aug-09	1	3,000	0	31,169	31,089	\$ (98,817.60)	\$	-
Sep-09	1	3,000	0	32,767	32,091	\$ (104,692.80)	\$	-
Oct-09	1	3,000	0	32,588	32,588	\$ (103,713.60)	\$	

Louisville Gas and Electric Company

Case No. 2009-00549

Curtailment Service Rider 1 (CSR1) - Primary For the Test Year Ending October 31, 2009

Start Date	Start Time	End Date	End Time	Duration in Hours	Estimated MW Curtailment
1/15/2009	7:00:00 AM	1/15/2009	9:00:00 PM	14.0	30.0
1/16/2009	7:00:00 AM	1/16/2009	9:00:00 PM	14.0	30.0
6/2/2009	1:00:00 PM	6/2/2009	5:00:00 PM	4.0	20.0
6/17/2009	1:00:00 PM	6/17/2009	5:00:00 PM	4.0	29.0
6/23/2009	1:00:00 PM	6/23/2009	5:20:00 PM	4.3	28.0
6/24/2009	1:00:00 PM	6/24/2009	6:00:00 PM	5.0	
6/25/2006	1:00:00 PM	6/25/2009	6:00:00 PM	5.0	28.0
8/10/2009	1:00:00 PM	8/10/2009	2:00:00 PM	10	30.0
8/10/2009	2:00:00 PM	8/10/2009	3:00:00 PM	10	
8/11/2009	11:00:00 AM	8/11/2009	1:30:00 PM	2.5	30.0
8/11/2009	1:30:00 PM	8/11/2009	4:30:00 PM	3.0	
8/12/2009	11:00:00 AM	8/12/2009	5:00:00 PM	6.0	30.0
8/13/2009	1:00:00 PM	8/13/2009	2:00:00 PM	1.0	30.0
8/13/2009	2:00:00 PM	8/13/2009	5:00:00 PM	3.0	30.0
8/17/2009	10:00:00 AM	8/17/2009	11:00:00 AM	1.0	
8/17/2009	11:00:00 AM	8/17/2009	6:00:00 PM	7.0	1.0
8/26/2009	1:00:00 PM	8/26/2009	2:00:00 PM	1.0	
8/26/2009	2:00:00 PM	8/26/2009	6:00:00 PM	4.0	30.0
8/27/2009	11:00:00 AM	8/27/2009	6:00:00 PM	7.0	30.0

Attachment to Response to LGE AG-1 Question No. 236 (g) Page 2 of 2 Conroy/Seelye

Louisville Gas and Electric Company

Case No. 2009-00549 Curtailment Service Rider 1 (CSR1) - Transmisison For the Test Year Ending October 31, 2009

Start Date	Start Time	End Date	End Time	Duration in Hours	Estimated MW Curtailment
6/2/2009	1:00:00 PM	6/2/2009	5:00:00 PM	4.0	18.0
8/27/2009	11:00:00 AM	8/27/2009	6:00:00 PM	7.0	

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 237

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-237. With regard to LG&E's current Curtailment Service Rider 2 ("CSR2"), please provide the following amounts by rate schedule, separated between Primary and Transmission, for each month of the test year:
 - (a) number of customers;
 - (b) total firm contract demand;
 - (c) total contract curtailment load;
 - (d) total billing demand;
 - (e) total demand credits;
 - (f) total non-compliance charges by month; and,
 - (g) listing of date, time, duration, and estimated MW curtailment.

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-237. The Company did not have any customers subject to the Curtailable Service Rider 2 within the test year.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 238

Responding Witness: Robert M. Conroy/William Steven Seelye

- Q-238. With regard to LG&E's current Curtailment Service Rider 3 ("CSR3"), please provide the following amounts by rate schedule, separated between Primary and Transmission, for each month of the test year:
 - (a) number of customers;
 - (b) total firm contract demand;
 - (c) total contract curtailment load;
 - (d) total billing demand;
 - (e) total demand credits;
 - (f) total non-compliance charges; and,
 - (g) listing of date, time, duration, and estimated MW curtailment.

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-238. The Company did not have any customers subject to the Curtailable Service Rider 3 within the test year.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 239

- Q-239. With regard to LG&E's proposed Curtailable Service Rider ("CSR") referenced at Pages 22-24 of Mr. Seelye's direct testimony, please provide all workpapers, spreadsheets, source documents, assumptions, etc. utilized to develop the CSR provisions (curtailable hours, buy-through rates, etc.) being proposed in this case. Please provide the response in hard copy as well as in Microsoft readable electronic format as applicable (preferably Microsoft Excel).
- A-239. There are no workpapers used to develop the CSR provisions.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 240

- Q-240. With regards to the Specific Assignment of Interruptible Credits shown in LG&E Seelye Exhibit 24, Page 37 through 39:
 - (a) please explain what the <\$2,667,453> of "Specific Assignment of Interruptible Credit" represents and provide all workpapers showing the determination of this amount;
 - (b) please explain and provide all workpapers, spreadsheets, source documents, and analyses showing how the "specific assignments" were made to individual classes; and,
 - (c) please explain the basis and provide all workpapers and spreadsheets showing how the Allocation of Interruptible Credits were made; e.g., the development of Allocation Vector "INTCRE."
- A-240. (a) The <\$2,667,453> of "Specific Assignment of Interruptible Credit" represents the interruptible credits provided to CSR customers during the test year. See page 1 of Seelye Exhibit 6.
 - (b) The amount is assigned to the rate class under which the customer is served. See page 1 of Seelye Exhibit 6.
 - (c) The "INTCRE" allocation factor represents the sum of the winter and summer fixed production plant. The calculation is shown in the cost of service study provided in response to KPSC-2 Question No. 125.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 241

Responding Witness: Chris Hermann

- Q-241. Please provide a list of LG&E distribution overhead conductor types and sizes currently being installed (typical), separated by primary system and secondary system.
- A-241. Standard distribution conductors for new Primary and Secondary construction are:

Primary System - Bare Conductor

795 kcmil All Aluminum Conductor 336.4 kcmil All Aluminum Conductor 195.7 kcmil All Aluminum Alloy Conductor 123.3 kcmil All Aluminum Alloy Conductor

Primary System - Covered Conductor

795 kcmil All Aluminum Aerial Cable 336.4 kcmil All Aluminum Aerial Cable 3/0 AWG All Aluminum Aerial Cable

Secondary/Service Conductors - Insulated

3/0 AWG 1/C All Aluminum
336.4 kcmil 1/C All Aluminum
795 kcmil 1/C All Aluminum
#4 AWG All Aluminum 2/C Duplex
1/0 AWG All 3/C Aluminum Parallel Lay
4/0 AWG All 3/C Aluminum Parallel Lay
#2 AWG All Aluminum 3/C Triplex and 4/C Quadruplex
1/0 AWG All Aluminum 3/C Triplex and 4/C Quadruplex
4/0 AWG All Aluminum T3/C riplex and 4/C Quadruplex

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 242

Responding Witness: Chris Hermann

- Q-242. Please provide the total installed LG&E primary voltage Overhead conductors footage.
- A-242. As of December 31, 2009, LG&E reports approximately 7,700 primary voltage overhead conductor miles.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 243

Responding Witness: Chris Hermann

- Q-243. Please provide the total installed LG&E secondary voltage Overhead conductors footage.
- A-243. As of December 31, 2009, LG&E reports approximately 2,400 secondary voltage overhead conductor miles.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 244

Responding Witness: William Steven Seelye

- Q-244. With respect to Mr. Seelye's LG&E zero-intercept analysis (summarized in Exhibits 25 through 27), please provide:
 - (a) statistical output including all diagnostic statistics;
 - (b) specific definition of dependent and independent variable(s) utilized corresponding to the data provided in each Exhibit;
 - (c) specific regression model (including coefficient);
 - (d) definition of "size" for each account;
 - (e) definition of "quantity" for each account; and,
 - (f) source documents supporting Mr. Seelye's regression data.
- A-244. (a) See response to KPSC-2 Question No. 125.
 - (b) For overhead conductor, the dependent variable is the average cost per foot of conductor. The independent variable is the size of the conductor in MCM. For underground conductor, the dependent variable is the average cost per foot of conductor. The independent variable is the size of the conductor in MCM. For line transformers, the dependent variable is the average cost per transformer and the independent variable is the size of the transformer category in KVA. The analysis uses weighted regression with the feet of conductor or number of transformers as the weights.
 - (c) See response to KPSC-2 Question No. 125.
 - (d) See response to (b).
 - (e) See response to (b).
 - (f) See response to KPSC-2 Question No. 125.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 245

Responding Witness: William Steven Seelye

- Q-245. Please provide Seelye LG&E Exhibits 25 through 27 in executable electronic spreadsheets. In this response include all analyses and calculations conducted to develop each zero-intercept analysis.
- A-245. See response to KPSC-2 Question No. 125.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 246

Responding Witness: William Steven Seelye

- Q-246. Please provide the following separated between primary and secondary (as available) by vintage year, size, and type for LG&E Account 365 (Overhead Conductors) in the greatest level of detail available:
 - (a) installed footage;
 - (b) gross investment;
 - (c) materials investment;
 - (d) capitalized labor; and,
 - (e) Handy-Whitman Cost Index or equivalent.

If all data is not available for all years, please provide the level of detail that is available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-246. See response to KPSC-2 Question No. 125. Gross investment includes both materials investment and capitalized labor. Hard copies are not being provided due to the volume of the data requested.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 247

Responding Witness: William Steven Seelye

- Q-247. Please provide the following separated between primary and secondary (as available) by vintage year, size, and type for LG&E Account 367 (Underground Conductors) in the greatest level of detail available:
 - (a) installed footage;
 - (b) gross investment;
 - (c) materials investment;
 - (d) capitalized labor; and,
 - (e) Handy-Whitman Cost Index or equivalent.

If all data is not available for all years, please provide the level of detail that is available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-247. See response to KPSC-2 Question No. 125. Gross investment includes both materials investment and capitalized labor. Hard copies are not being provided due to the volume of the data requested.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 248

Responding Witness: William Steven Seelye

- Q-248. Please provide the following separated between primary and secondary as available by vintage year, size and type for LG&E Account 368 (Line Transformers) in the greatest level of detail available:
 - (a) installed units;
 - (b) gross investment;
 - (c) materials investment;
 - (d) capitalized labor; and,
 - (e) Handy-Whitman Cost Index or equivalent.

If all data is not available for all years, please provide the level of detail that is available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-248. See response to KPSC-2 Question No. 125. Gross investment includes both materials investment and capitalized labor. Hard copies are not being provided due to the volume of the data requested.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 249

Responding Witness: William Steven Seelye

- Q-249. Please explain how and where Curtailable Rider revenue credits are reflected in the LG&E revenues in Exhibits 5, 6, and 7 and class cost of service study (Seelye Exhibits 23 and 24).
- A-249. Curtailable Rider revenue credits are included in the row labeled "Sales to Ultimate Consumers" on pages 37 through 39 of Seelye Exhibit 24. Curtailable Rider revenue credits are shown as CSR amounts on Seelye Exhibit 5.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 250

Responding Witness: William Steven Seelye

- Q-250. Please provide the following KU Exhibits associated with the electric operations filing in executable Excel format (include all linked files):
 - (a) Seelye Exhibit 2;
 - (b) Seelye Exhibit 4;
 - (c) Seelye Exhibit 5;
 - (d) Seelye Exhibit 6;
 - (e) Seelye Exhibit 7;
 - (f) Seelye Exhibit 11;
 - (g) Seelye Exhibit 12;
 - (h) Seelye Exhibit 15;
 - (i) Seelye Exhibit 18; and,
 - (i) Seelye Exhibit 20.

Please include in this response all the workpapers, spreadsheets, source documents, etc. that support the amounts, assumptions and calculations presented in these Exhibits.

A-250. See response to KPSC-2 Question No. 125. Additional workpapers, spreadsheets, source documents, etc. are provided in an attached CD, in the folder titled Question No. 250.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 251

Responding Witness: Shannon L. Charnas

- Q-251. Please provide LG&E adjusted test year General plant by FERC account and sub-account.
- A-251. See attached.

LOUISVILLE GAS & ELECTRIC COMPANY GENERAL PLANT IN SERVICE - ELECTRIC OCTOBER 2009

Account	Total
E392.10-Transportation - Cars Truck	\$ 9,108,563
E392.20-Transportation - Trailers	609,887
E394.00-Tools, Shop, and Garage Equipment	3,220,314
E395.00-Laboratory Equipment	1,496,151
E396.10-Power Op Equip-Hourly Rtd	2,335,697
E396.20-Power Op Equip-Other	51,068
Total General Electric Plant in Service - KY	\$ 16,821,680

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 252

Responding Witness: Shannon L. Charnas

- Q-252. Please provide LG&E adjusted test year CWIP in the greatest detail available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-252. See attached. The requested information is also on the attached CD, in folder titled Question No. 252.

Charnas

<u>Description</u>	Amount
MISC. SUBSTATION PROJECTS	\$ 57,281.64
MC ASH POND EXPANSION STUDY	2,308,650.84
CR LANDFILL VERTICAL	1,543,332.00
TC2 PROJECT	118,985,076.29
SUBSTATION PROTECTION MODIFICATIONS	1,311,858.75
TRANSFORMER REWIND (SMYRNA TR1)	62,383.95
DEVELOPMENT FOR TRIMBLE COUNTY UNIT # 2 TRANSMISSION	32,779,196.85
LG&E SUBSTATION SPILL PREVENTION	1,531,341.28
OHIO FALLS REDEVELOPMENT	5,013,423.89
MUD LANE SMYRNA 69 KV SURVEY	216,876.40
FUEL SUPPLY MANAGEMENT SYSTEM	717,185.49
LGE DIST. 34.5KV STORM	667.81
LGE TRANS. 34.5KV STORM	667.81
BRECKENRIDGE 138-69 KV (BR6) TRANSFORMER REPLACEMENT	143,808.79
6688 P2-2005	17,879.96
AUXILLARY CONTROL SWITCHES FOR GE AM13.8-500 BREAKERS	66,852.18
TC CONTROL SYSTEM UPGRADE ENGINEERING SCOPE	5,664,582.19
PADDY'S RUN 3311B BREAKER REPLACE	124,414.84
REHL ROAD PUMP STATION	202,919.29
CANE RUN NEW LANDFILL	937,144.34
TRIMBLE COUNTY ASH/GYPSUM PONDS	5,063,101.07
TC2 AQCS LGE	42,695,168.26
MC LIMESTONE ENGINEERING STUDY	313,367.93
INSTALL WILDLIFE PROTECTION OF CANAL SUBSTATION	339.36
BLUE LICK / BULLITT CO. 161KV DOUBLE CIRCUIT	47,553.02
BLUEGRASS CIRCUIT WORK	1,446,837.78
LGE ELECTRIC METER PURCHASE & INSTALLS	233,860.05
TC SPCC COMPLIANCE CAPITAL	186,456.85
TC1 EXPANSION JOINT REPLACEMENTS	50,393.83
TC MISC PLANT ENGINEERING	(183.12)
CR6 LOWER WATER WALL SLOPE REPLACEMENT	157,666.16
PR SPCC COMPLIANCE	9,469.97
ZN SPCC COMPLIANCE	13,348.54
BR CT UNDERGROUND PIPE SPCC	249,921.68
CONSTRUCT NEW WATERSIDE DISTRIBUTION SUBSTATION	(4,486.59)
WATERSIDE SITE RELOCATION RECONFIGURE TRANSMISSION LINES	(214,223.14)
SO3 SORBENT INJECTION	130,504.63
MT 138KV COLLINS TERMINATION	889,535.50
MIDDLETOWN - COLLINS 138 KV LINE	833,298.60
COLLINS 138/69KV 150MVA TRNSFRMR	1,433,175.70
NEW BASE GENERATING UNIT - LGE	215.14
UPS GRADE LANE	3,140,794.10
UPS/GRADE LANE 12KV CIRCUIT WORK	1,050,091.16
WESTPORT RD O/H HUBBARDS LN TO AMBRIDGE CIR PUBLIC WORKS	609,172.05

<u>Description</u>	<u>Amount</u>
MUSEUM PLAZA U/G RELOCATION (CIRCUITS 3861, 3809, & 6617)	2,143,884.09
MC2 RECYCLE PUMP PIPING 2009	384,760.75
UPS/SEMINOLE SUBSTATION ADDITION	80.72
MC1 345KV DISCONNECT SWITCH	629.34
MC FIRE PROTECTION PIPING	143,685.00
PORTABLE TRANSFORMER REGULATOR PURCHASE	396,182.07
CONESTOGA SUBSTATION	1,051,265.66
EASTWOOD SUBSTATION DISTR CIRCUIT WORK	875,286.83
CONESTOGA SUBSTATION	2,951,514.65
EASTWOOD WEST SUBSTATION CONSTRUCT NEW SUBSTATION	2,169,474.92
NEW BECKWITH TAP CHANGER CONTROLLER FOR COLLINS TR 1	3,510.50
MC UNITS 1,2, AND 4 FGD ENGINEERING ASSESSMENT	444,484.68
CT7 A/B CONVERSION - LGE	(705,819.47)
TC SAFETY & ERT EQUIPMENT	41,020.05
TC 480V SWITCHGEAR BREAKER UPGRADE PHASE 3	344,391.23
TC SPCC COMPLAINCE CAPITAL	127,920.81
TC CBU COUNTERWEIGHT CABLE REPLACEMENT	452,218.03
TC CT PURCHASE/INSTALL UCVG CONTROLLER	15,212.50
JT1128 RECONDUCTOR	347,525.28
MUD LANE HUMANA DATA CENTER	4.59
TC VEHICLE PURCHASES	63,646.33
EMS OSI WORKSTATIONS	22,297.00
DIST CONESTOGA TAP	637,310.70
TC1 CATALYST LAYER PURCHASE & INSTALLATION 2008-2011	803,793.48
DIST EASTWOOD WEST TOP	58,730.45
UNDER FREQUENCY LOAD SHEDDING - LGE	56,859.90
CHAMBERLAIN LANE HWY RELOCATION	209,130.13
ELECTRIC RELIABILITY ENHANCEMENTS OH	241,625.39
GS LGE LARGE FORMAT EQUIPMENT	46,228.72
PLANT LAB EQUIPMENT UPGRADE	46,822.27
GAS CHRMATOGRAPH TOGAS REPLACEMENT LGE	40,270.80
GS CR CEMS DILUTION PROBES	77,799.48
DATA QUALITY INITIATIVE LGE	36,852.17
CR6 FRONT REHEAT PENDANT REPLACEMENT	1,419,184.20
MC 4 DCS HARDWARE UPGRADE	140,071.16
MC4 SCR CATALYST	190,285.27
MC3 AIR HTR BASKETS	55,157.74
MC4 AIR HEATER BASKETS	60,257.68
MC3 345KV DISCONNECT SWITCH	173,735.34
MC MATERIAL HANDLING CHUTES	45,268.50
TC 08 MISC R1 SUMP PUMP REPLACEMENT	14,266.86
CR6 BURNER CORNER REPL.	935,132.71
CR5 4KV SWITCHGEAR UPGRADE	1,626,473.55
CR HARDWARE REFRESH	83,422.79

Description	<u>Amount</u>
CR ASBESTOS ABATEMENT	86,750.92
CR MISC ROOF REPLACEMENT	196,763.21
RELOC. DIST. HWY. FACILITIES	(122,529.19)
CR4 FGD MIST ELIMINATOR	33,736.76
MIDDLETOWN 6601 CIRCUIT BREAKER CHANGE OUTS	227,152.89
TC 1 1D FAN VFD UPGRADE	2,427,831.35
TC 1 LOWER SLOPE BOILER REPLACEMENT09	1,888,788.29
TC 480V SW'GEAR BREAKER UPGRADE	306,697.31
TC 1 EMERGCY BATTERY & CHAR	35,696.70
TC COAL CONVEYOR REPLACEMENT	127,284.04
TC TURBINE OUT PACKING	174,979.74
TC 02 ANALYZER REPLMNT	91,598.09
TC SPLIT COMMON REACT FEED A/B	11,089.92
TC LAB PURCHASE MONITORS	49,835.76
TC SAFETY AND ERT EQUIPMENT	24,692.11
TC CBU CHAIN & SPROCKET REPLACEMENT	300,988.93
TC CT LUBE OIL VARNISH	39,680.84
WILDLIFE PROTECTION ON ALGONQUIN 14KV AND FERN VALLEY	71,917.28
MADISON SUBSTATION EXPANSION	172,953.53
OLD HENRY SUBSTATION-CONSTRUCT NEW SUBSTATION	92,419.69
LYNDON TR 2 TAP CHANGER CONTROLLER	147,769.38
SOUTH PARK SUBSTATION FENCE	12,942.62
AUXILLARY CONTROL SWITCHES INSTALLATION	39,071.80
REPLACE FPE 525 & 546 TRANSFORMER LOAD TAP CHANGERS	2,785.82
REPLACE STATION BATTERY BANK AT 8 SUBSTATIONS	74,345.58
HILLCREST TRANSFORMER#1 BUSHING	6,580.11
CR FGD ENGINEERING ASSESSMENT	119,737.50
SSC TRANSFORMER SERVICES RENOVATION	89,991.55
ELECTRIC EHANCE OH DISTR	273,901.06
OLD HENRY SUBSTATION-OLD HENRY CROSSINGS DUCT WORK	175,863.03
ERTS	97,334.22
TC TELEHANDLER/ALL TERRAIN FORKLIFT & SKID LOADER	95,075.36
MULDRAUGH RELIABILITY EMPROVEMENTS	23,518.94
PRIMATE TECHNOLOGIES BLACKBOARD	4,475.15
DIX DAM NETWORK UPGRADE	19,994.29
CR NERC CYBERSECURITY	351,889.30
CR GT11 SPCC	208,537.19
TC1 DIAPHRAGM PUMP	6,700.80
TC MISC ENG CAPITAL IDLER SPROCKET FOR CBU	36,439.17
REPLACE CANAL 69KV DOUBLE BUSHING PTS	23,821.62
TC CT BOROSCOPE	16,663.61
TC HIGH PRESSURE ASH WATER PUMP	29,059.99
3 SPARE POTENTIAL TRANSFORMERS FOR LOUISVILLE	16,744.08
TC VEHICLES PURCHASE	16,401.14

LGE 107001 Electric CWIP Balance

As of October 31, 2009

Description	Amount
DIGITAL FAULT RECORDER STUDY - LGE	348,129.60
BOC TRANSMISSION DEPT OFFICE RENOVATION	9,998.61
CRS LP FEEDWATER HEATER DRAIN PUMP REPL	21,495.96
ALGONQUIN TR 5 69 KV UNDERGROUND CABLE AND MAIN BUS	42,118.24
CR STATION PRECIPITATOR CONTROLS UPGRADE	12,269.92
BRCT SPARE SF6 SFC MED VOLTAGE STARTING BREAKER	340.99
MC 2A BOILER CIRCULATING WATER PUMP MOTOR REWIND	26,543.96
MC 4-2 MAIN AUX TRANSFORMER BUSHINGS	90,078.14
CR4 BOOSTER AND ID FAN VIBRATION MONITORING	38,087.34
CR4 CONDENSER EXPANSION JOINT REPLACEMENT	16,535.71
REPLACE SURGE ARRESTERS	30,581.91
REPLACE CANAL BREAKER C-3861	115,710.24
REPLACE CLIFTON BREAKER CL-6624	58,587.72
REPLACE SEMINOLE BREAKER 69KV BUS TIE 1-2	51,215.40
REPLACE MILL CREEK BREAKER MC-138KV TR 7 & 8	124,496.69
REPLACE MILL CREEK BREAKER MC-3855	125,734.78
TC MISC ENG CAPITAL-COAL SAMPLE CRUSHER	10,199.76
REPLACE 138KV RELAY AT BEARGRASS-LINE 3883	75,671.08
U09-BATTERIES	41,663.22
TC MISC ENG CAPITAL-NEW COMPRESSOR UNIT FOR CHILLER	17,603.28
TRANSMISSION CONTROL CENTER ADDITIONAL OFFICE SPACE	984.84
CR5 B SUMP PUMP MOTOR REWIND	59,339.71
CR4 MAIN AUX OIL PUMP REPL	9,307.52
FIRE PUMP ROTOR - MISC ENG	23,193.39
CR ICE MACHINE	2,483.42
OLD HENRY SUBSTATION TAP 138 KV LOOP	9,335.67
MUSEUM PLAZA U/G DISTRIBUTION ELECTRIC	578,380.64
CR ELECTRICAL EQPT HVAC UPGRADE	36,718.38
CR STATION SWITCHGEAR RESTORATION	716.64
ALGONQUIN 1374 & 1380 RECONDUCTOR NEW BUS. RESIDENTIAL O/H	137,825.08
SHELBY CAMPUS OFFICE PARK	135,147.48
CR4 FGD A INLET DUCT EXP JT	12,757.00
CR5 A ID FAN INLET EXP JT	4,017.97
SV FRQ SOURCE	893.67
CR5A CIRC WATER PUMP MTR REWIND	66,471.70
TC GSU BUSHING-MISC ENG	34,395.45
NETWORK TRANSFORMER HIGH VOLTAGE COMPARTMENT RETROFIT	92,387.30
REPAIR 69KV U/G 6617	369,673.69
EMS OSI WORKSTATIONS	14,663.96
CR AIR MONITORS	9,703.85
PURCHASE FORKLIFT FOR TRANSFORMER SERVICES	614.80
CR E-1 CONVEYOR COAL BELT	42,159.88
CR SCREENHOUSE SWITCHGEAR RESTOR	449,807.06
BRCT6 QUENCH COOLER NOZ REPL - LGE	71,205.72

<u>Description</u>	<u>Amount</u>
MC TSI SYSTEM UPGRADE	24,425.42
REVISED BRCT 5-6-7 PI INTERFACE	20,640.00
CR5B CQP MOTOR REWIND	67,094.20
MCFIELD COMMUNICATOR EQUIP	5,071.41
DISTRIBUTION THIRD PARTY POLE ATTACHMENT WORK	2,186.94
TC1 GENERATOR STATOR REWEDGE	206,895.78
TC1 TURBINE GENERATOR TIL 1292	198,213.60
TC1 TURBINE SNOUT RINGS	99,060.00
LT MISC CAPITAL	32,705.99
BEYOND THE METER RC391	(42.90)
BLANKET CABLE FOR JOINT TRENCH	2,809,022.29
TRANS, LINE RELOCATION	13,635.48
NEW FACILITY TRANS. LINE	63,110.66
LINE PARAMETER UPGRADES	15,735.00
PARAMETER UPGRADE T-LINE LGE	83,235.69
LGE STORM DAMAGE TRANS. LINE	80,877.04
PRIORITY TRANS. LINE REPL. LGE 2009	553,618.78
LGE TRANS. SUB MISC. CAPITAL	97,116.00
LT9 TRANSMISSION	11,103.24
LT9 EXPANSION	65,468.62
TRANS. SUB TERMINAL UPGRADES	8,994.92
CAP/REG/RECL 340	901,046.72
NEW BUS COMM OH 330	(657.10)
NEW BUS COMM OH 340	592,392.27
NEW BUS COMM UG 340	524,070.21
NEW BUS COMM UG 341	6,952.91
NEW BUS COMM UG 344	(21,098.24)
NEW BUS INDUS UG 341	29,843.07
NEW BUS RES OH 340	756,672.43
NEW BUS RES UG	9,672.00
NEW BUS RES UG 341	157,264.66
NEW BUS. RES. 344 UG	750.39
NEW BUS SUB OH 340	43,591.17
NEW BUS SUB UG	136.89
NEW BUS SUB UG 341	287,478.09
NEW ELECTRIC SERVICES	183,331.94
NEW BUS. SERV. 341 UG	1,218.22
NETWORK VAULTS 343	67.55
PUB WORKS RELOC OH 330	150,383.29
PUB WORKS RELOC OH	240,602.09
PUB WORKS RELOC UG 340	170,560.64
PUBLIC RELOCATIONS U/G	49,259.95
POLE TREAT 340	49,363.97
PM INSPECTION 340	14,334.28

LGE 107001 Electric CWIP Balance As of October 31, 2009

Description	Amount
CUST REQ 340	503,274.08
REPL DEFECTIVE CABLE 340	458,071.34
REPAIR REP. DEFECT. EQUIP. 003065	44,714.88
MERCURY BULB REPL. PROJECT	206,899.22
REP DEF POL'S 320	(549.22)
REP DEF POL'S	13.91
POLE REP/REPL 340	954,390.86
REPAIR STREET LIGHTING 332	4,788,688.83
REP DEF ST LIGHTS 340	330,044.10
REPAIR DEFECT. STREET LIGHTING	1,221,000.22
LGE GENERAL RELIABILITY 01015	568,326.67
DIST. 0/H RELIABILITY 340	275,019.69
DIST U/G RELIABILITY 340	303,303.98
REP THR PARTY DAM 340	3,258,080.51
REPAIR THIRD PARTY DAMAGES-419	143,984.49
STREET LIGHTING 332	900,324.31
LGE MAJOR STORM EVENT	1,109,384.58
MINOR STORM EVENTS LOUISVILLE	96,669.56
SYS ENH EXIST CUST 340	325,884.36
TROUBLE OVERHEAD 340	329,066.82
TROUBLE UNDERGROUND 340	83,552.72
TOOLS AND EQ 340	812,039.72
WEATHER 003400	87,271.72

\$ 285,244,859.73

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 253

Responding Witness: Shannon L. Charnas

- Q-253. Please provide LG&E adjusted test year depreciation reserve and depreciation expense by FERC account.
- A-253. See attached.

Louisville Gas & Electric Company Depreciation Reserve and Expense - Electric As of October 31, 2009

Account		Reserve	7	Гest Year Expense
Distribution				
E361.00-Structures and Improvements	\$	(1,900,189)		
E362.00-Station Equipment		(36,800,632)		
E364.00-Poles, Towers, and Fixtures		(66,531,254)		
E365.00-OH Conductors and Devices		(89,294,754)		
E366.00-Underground Conduit		(25, 156, 773)		
E367.00-UG Conductors and Devices		(45,497,051)		
E368.00-Line Transformers		(57,271,129)		
E369.10-Underground Services		(1,646,288)		
E369.20-Overhead Services		(17,760,060)		
E370.00-Meters		(17,020,509)		
E373.10-Overhead Street Lighting		(18,082,268)		
E373.20-Underground Street Lighting		(20,038,372)		
E373.40-Street Lighting Transformer		(89,351)		
E374.05-ARO Cost Elec Dist (L/B)		(13,102)		
25,1100,1200,000,200,200,000,000	\$	(397,101,732)	\$	21,828,886
Hydro				
E331.00-Structures and Improvements	\$	(4,297,782)		
E332.00-Reservoirs, Dams, and Water	•	(1,035,188)		
E333.00-Water Wheels, Turbines, Generators		(899,038)		
E334.00-Accessory Electric Equipment		(1,617,902)		
E335.00-Misc Power Plant Equipment		(40,140)		
E336.00-Roads, Railroads, and Bridges		(17,806)		
E337.07-ARO Cost Hydro Prod (Eqp)		(17,728)		
E337.07-1400 Cost Hydro Frod (Edp)	\$	(7,925,584)	\$	629,144
Intangible				
E302.00-Franchises and Consents	\$	(100)		
2502.00 Francisco and Consesso	\$	(100)		
Other Production				
E341.00-Structures and Improvements	\$	(3,283,209)		
E342.00-Fuel Holders, Producers, Access		(1,926,657)		
E343.00-Prime Movers		(27,901,923)		
E344.00-Generators		(14,338,752)		
E345.00-Accessory Electric Equipment		(4,635,330)		
E346.00-Misc Power Plant Equipment		(1,048,703)		
E347.05-ARO Cost Other Prod (L/B)		(833)		
E347.07-ARO Cost Other Prod (E/B)		(88,071)		
25 1,101 1 1 1 0 0 0 0 0 0 1 1 1 1 0 1 (2-qp)	\$	(53,223,478)	\$	8,197,259

Louisville Gas & Electric Company Depreciation Reserve and Expense - Electric As of October 31, 2009

Account		Reserve	Test Year Expense
		, , , , , , , , , , , , , , , , , , , ,	
Steam Production	ф.	(207.004.5(2)	
E311.00-Structures and Improvements	\$	(207,904,562)	
E311.01-AROP Structures and Improvements		(8,721,957)	
E311.10-Capital Leased Equipment		(2,362)	
E312.00-Boiler Plant Equipment		(622,497,184)	
E312.01-AROP Boiler Plant Equipment		(550,080)	
E314.00-Turbogenerator Units		(122,482,716)	
E315.00-Accessory Electric Equipment		(111,631,952)	
E315.01-AROP Accessory Electric Equipment		(7,345,711)	
E316.00-Misc Power Plant Equipment		(5,486,069)	
E317.07-ARO Cost Steam (Eqp)		(2,516,193)	 (4.005.340
	\$	(1,089,138,786)	\$ 64,085,340
Electric Transmission			
E350.10-Land Rights	\$	(1,611,015)	
E352.10-Struct & Imp-Non Sys Control		(1,550,545)	
E353.10-Station Equipment - Non System		(67,758,305)	
E353.11-AROP Station Equip Non System		(2,613)	
E354.00-Towers and Fixtures		(21,729,682)	
E355.00-Poles and Fixtures		(15,593,329)	
E356.00-OH Conductors and Devices		(22,409,874)	
E357.00-Underground Conduit		(526,043)	
E358.00-UG Conductors and Devices		(1,774,517)	
E359.15-ARO Cost Transm (L/B)		(664)	
	\$	(132,956,587)	\$ 4,973,283
General			
E392.10-Transportation - Cars Truck	\$	(9,006,535)	
E392.20-Transportation - Trailers		(226,119)	
E394.00-Tools, Shop, and Garage Equ		(1,144,759)	
E395.00-Laboratory Equipment		(1,224,526)	
E396.10-Power Op Equip-Hourly Rtd		(2,266,928)	
E396.20-Power Op Equip-Other		(24,841)	
	\$	(13,893,708)	\$ 507,054
Total Electric Plant in Service	\$	(1,694,239,975)	\$ 100,220,966

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 254

Responding Witnesses: Valerie L. Scott

- Q-254. Please provide all LG&E calculated, actual, or estimated test year uncollectible expense by customer class.
- A-254. This information is not available. The Company does not maintain uncollectible expense by customer class.

Please see the Company's response to KPSC-1 Question No. 35 for additional information.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 255

Responding Witness: Butch Cockerill

- Q-255. Please provide actual and estimated LG&E meter reads by class during the test year, and/or the most recent 12 months available.
- A-255. See below for the period November 1, 2008 October 31, 2009.

	Number of	Number of
Rate Schedule	Actual Reads	Estimated Reads
Commercial Power Service	39,781	1,589
Commercial Time Of Day	1,866	52
Company Use	96	24
General Responsive Pricing	19	1
General Service	548,783	24,721
Industrial Power Service	5,110	154
Industrial Time Of Day	1,187	229
Lighting Energy	1,320	129
Net Metering Service - Commercial General Service	13	0
Net Metering Service - Commercial GS	9	0
Net Metering Service - Residential	34	0
Residential Responsive Pricing	691	9
Residential Service	4,289,818	92,979
Retail Transmission Service	136	55
Small Time Of Day	151	0
Special Contract - Fort Knox	24	24
Special Contract - Louisville Water Company	52	2
Temp Susp - Commercial	1,536	454
Temp Suspension - Company Use	534	83
Temp Suspension - Industrial	14	7
Temp Suspension - Residential	3,036	420
Traffic Energy	10,521	210
Volunteer Fire Department	60	0
Total	4,904,791	121,142

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 256

Responding Witness: Butch Cockerill

- Q-256. Please provide the following by month for the period April 2006 through the most recent month available by rate schedule for LG&E:
 - (a) customers billed; and,
 - (b) billed KWH (as applicable).

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-256. (a), (b) See attached. Also see attached CD, in folder titled Question No. 259 for the Microsoft Excel version of the attachment.

	7	661	380	061	07/	£	7	799	753	-	6	_	_				000	T	100	1
Dec-06	kWh	316,175,89	108,838,380	175 636	. 904 05	20.400,	\$4,123	197,971	387	:	333.						16 848 000		920 721 100	
Δ	Customers	350.348					376	63	119		606						•		195 330	
Nov-06	kWh	265 477 919	102,183,105	170 970 117	10000	48.167,903	53,568,038	196,374,507	171 240		317,443						79 978 600	200:01:2:	C18 831 738	***************************************
S.	Customers	350.210	40.735	2716	21,77	3	376	64	118	:	106						-		205 180	272:187
Oct-06	kWh	183 304 681	107 748 386	107 275 400	25,020,001	51,726,814	55,904,141	203.160.152	335 512	1000	313,950						007 883 01	27.300,400	202 500 500	CCC, 10C, PC0
ర	Customera	251 200	40.740	21.0	4117	3	379	59	=	2	903						•	,	201 201	330,187
Sep-06	rw.	CCC 003 CO3	121 064 366	200,000	718,940,544	068,890,19	61.217.880	313 291 578	207.000	010767	322,861	_	_				00, ,00	33,690,000	001 000	1,129,620,169
S	Customers	10001	149,644	27.04	2,730	65	376	39	3 :	=	903						,	4		394,809
Aug-06	F.W.P		595,11,115	100,100,141	228,530,308	81,056,678	62 907 621	700 111 814	10,111,504	017 507	299,395	_						41.580.000		396,417 1,268,470,369 1
Au	Customers		957 156	40,660	2,707	35	380	3	3 :	È	903							7	:	396,417
Infak	run.		463,061,543	566,800,651	220,876,716	58 076 608	40 440 913	100000	212,822,213	575,755	300,606							39,421,600		1,200,307,146
-		C. USIOITICI 3	350,857	41,821	2,737	99	Ę		8	6	106							7		396,948
104	100	KWI	350,573,897	124,432,211	204.374,372	177 164	101111111111111111111111111111111111111	C01,144,0C	215,933,992	252,815	328,977							35,772,000		1,045,861,611
		Customers	350,032	40,766	2,742	77	9 5	280	99	113	897							7		395.070
	May-up	KWP	250,820,564	106,143,404	185,470,722	100 076 774	*61,510,05	54,656,804	218,212,748	295.447	108 174							32,045,400		898,028,997
		Customers	350,087	40,740	2.741		ō į	379	09	121	000							-		395,093
	Apr-06	KWh	261.505.074	101,723,852	171 924 280		41,142,932	52,701,602	205,226,024	111 100	308 901	1						31.158.600		872,621,898
		Customers	349,142	40,663	277.5		ç	380	89	3	100	ã						**		394,062
		Rate Schedule	RS	SS		3 !	001-5-1	<u></u>	LP-TOD	5	11.0	3	<u>S</u>	CTOD	9.	пор	RTS	Spec Contract		Totals

	£	1435	10,972,734 78,320,898 78,320,898 51,549,912 87,307,357 365,191 321,764	2300	3,695
3	Customers kWh	27 318 973 435		4 33,175,200	42 933.06
		50 357 637	4,000	00	75 398.3
2010	Customers kWh	266 771 960	107,132,224 176,452,062 50,473,948 53,492,779 191,666,554 306,923	31.810,400	878,445,4
_	Customers	167 884	41373 2,777 66 369 64 119 908	7	398,544
(25)	KWh	356 717 325	205.281.318 55.517.096 57.663.482 199.297,831 344,855	34,775,800	398,740 1311,842,345 398,370 1,037,453,278 398,544 878,445,475 398,342 933,063,695
3	Customers kWh	253 678	41,490 2,766 66 371 64 121 910	4	398,370
_		ŀ	20,178,179,179,179,179,179,179,179,179,179,179	39,558,000	11,842,345
o du	Customers	350536		7	398.740
		ŀ	23.5.5.6.5.2. 23.5.5.4.3.3. 23.5.6.5.3.4.3. 27.5.2.1 27.5.3.8.3.0 27.5.3.8.0 27.5.3.8.0 27.5.3.8.0 27.8.3.8.0 27.8.3.8.0	44,164,000	06,031,932
Aug-07	Customers	41.000	334,009 5 41,465 1 2,465 1 67 2 64 2 119 914	7	399,799 1
-		Ţ,	16,586,102 141,662,997 123,189,354 61,411,183 59,316,154 260,982 270,654	39,072,400	16,576,778
70-101	thing.	- Collica	355,848 4 41,378 1 2,777 2 374 63 2 117 910	47	199.538 1.2
-		ľ	11,484,121 11,4834,121 11,4834,121 59,188,368 58,896,970 288,577 296,691	38,301,800	16.278,454
Jun-07	THE PERSON NAMED IN COLUMN	Stomers	333,401 40 41,433 13 2,785 31 377 6 64 15 908	7	1,1 721,991
	-		209,110,773 110,778,843 12,748,205 54,410,945 54,410,713 275,919 301,867	34.359.200	938.012.510 399.157 1,116.278,454 399.538 1,216.576,778 399,799 1,306,031,932
7.0-xell	TARIA)		353.339	7	398.873
			270,503.866 109,355,673 180,970,677 50,882,243 54,057,199 199,081,041 334,201 299,326	31,494,600	896,968,226
,0 0	Į.	Customers	352,079 41,121 2,740 372 64 120 910	4	397,477
-		KWh C	110,844,978 110,844,978 11,039,47 52,762,707 19,415,184 313,032	30,966,000	397,756 924,588,843
	Mar-U	Customers	352,294 41,157 2,769 66 372 65 122 122 907	**	397,756
	- 20	kWh	366,435,112 118,995,777 118,995,216 49,253,228 53,527,435 186,597,196 291,393	33,203,200	987,627,262
	Feb-07	Customers	351,384 41,042 2,737 67 374 65 126 904	4	396,703
-	6	KWh	347.249,559 115,752,560 118,866,881 52,004,764 53,681,124 210,141,880 330,604 366,074	47.111.200	196 325 1.013,504,646
	Jan-07	Customers	351,023 41,038 2,735 67 373 68 115 905	**	196 125
		Rate Schedule Customers	RS GS CS CS LC-TOD LP-TOD SLE CS CS CS CS CS CTOD P TOD	RTS Sper Contract	Totals

_		_			
	kWh	353,660,217	121,330,237 779,982,850 49,831,371 167,587,354 311,042	28,992,400	386,512 953,555,386
	Customers kWh	341,312	40.941 2.788 62 352 59 120 874	7	386.512
200		251.555.955	103,449,401 172,088,398 47,626,238 52,815,447 184,551,551 306,228	28,727,600	400,043 841,639,306
	Customers kWh	354,725 2		7	400,043 8
		+		4 27,971,200	19,744,157
8733	Customers kWh	353 381 28		7	398,654 90
-		١		28,711,000	130,828
200	Customers	712 877		4 28	951,1 079.
-		ľ		_	954 399
Atto-03	I'm	ACT 017 191	148,77,20 272,263,713 61,046,396 61,868,918 195,145,687 168,950 280,494	35,217,200	1,208,045
_		366.436	355-41,043 2,820 2,820 359 63 110 881	4	400,769
20.1	rith.	200 676 616	488,015,016 114,656,713 60,480,896 60,298,334 197,298,861 199,953	35,094,800	191,217,960
7.7	THE PERSON	1050 de 1	352.291 40,976 2,818 65 365 64 113 879	4	400,575
		1	564,031,039 1028,251,632 56,525,787 57,444,121 206,130,488 247,827 288,603	33,589,400	400,886 1,053,345,577 400,575 1,191,217,360 400,769 1,208,045,954 399,670 1,136,130,828 398,654 909,744,157
	an-unr	_[355,828 3 40,784 1 2,777 2 365 365 365 8 1118 881	4	00,886 1.0
		7	240,130,447 3 103,837,231 103,837,231 49,102,530 22,465,693 186,112,745 247,746 279,428	4 26.606.000	298,033
	May-08		334,401 240 40,885 103 2,802 171 368 52 64 186 117 877	4 22	399,584 830
		C.W.	•••	171 400	026,989
-	Apr-08	Customers kWh	113,22.763 40.756 106.577.689 113,22.763 40.756 106.577.689 113,22.763 174,20.601 106.577.689 11,776.238 166.577.689 11,776.238 166.5799 11,776.238 167.579 116.579 11	4 26 171 400	8,477 869
		Cus	132,763 4 35; 172,598 4 172,598 776,338 176,338 170,710 170,710	008.0	5,184 39
	Mar-08	Customers kWh	71 328,888,904 712 113,822,763 718 19,922,763 66 49,233,685 66 51,776,338 66 196,073,119 712 297,267	01190 1190	52 947,47
		Custom	3542 40.8 2.7 2.7 3		82 399.3
	Feb-08	KWh	347,779,559 117,356,993 179,912,460 50,470,475 50,636,745 175,548,850 318,951 306,948	000 000	955,073,3
	Ľ.	Customers kWh	35.66. 94.779.559 4.771 17.256.99 2.781 179.912.460 56 50.566.748 564 175.548.850 119 318.951 106.948		397.693
	Jan-08		287 289 389		19.2115,000 4 3.2,142,000 4 3.2,142,000 4 3.2,142,000 100 100 100 100 100 100 100 100 100
	Jan	Customers	352,973 40,735 2,766 66 372 64 118 903	,	308 001
		Rate Schedule Customers kWh	RS GS CLC LC-TOD LP-TOD SSLE TLE CS CTOD TID	RTS	Spec Contract 4
	_	_			

1									00	44	1,m.00	100	60-101	Ϋ́	Aug-09	Se	Sep-09	061-03	-60
Jun-09		-5	Feb-09	Σ.	Mar-09	<	Apr-09	2					FAU.	Customera	t.Wh	Customera	KWh	Customers	KWh
the Schedule Customers EWh	W	Customers kWh	KWh	Customers	kWh	Customers	kWh	Customers	KAR	Customers	LW.	Customers		Current and	+	111 111	COB CAA 40A	242.450	987 701 985
341 993 407	181 202 1	07.081.202 342.511 3	334,465,465	342,619	279,851,669	346,525	284,744,878	345,942	248,441.815	345,219	375,906,911	342,232	446,543,479	144,793	20,934,643	34 030	955 366 961	41 509	119 140 883
	73 060 621	40.996	40.996 109.251.511	41,152	102,198,863	41,637	114,229,893	42.085	106,020,277	41,510	128,054,239	41,155	1,4,909,841	47,000	044,040,40	70,05			
		-										•	•		,		•		
86	89.907.247	,			•		•											,	
38,7	38,740,939			,		,	,				`				•	,			
50,1	0,160,108				•	,		,		,							,		
562 911 P51	16 295		•	,					•	,	•			. :		501	100 000	301	190 700
	000	911	220 010	133	100 001	83	236 454	011	459.179	601	325.261	=	309,350	108	234.443	2	700000	2	2
-	050,460	= :	25,00	1		,	211 230	223	171 611	887	140 255	880	349,611	883	436,430	883	273,643	886	369,367
~	331,338	875	235,659	28	203,690	66	0000000		100 002 271		106 981 158	277.4	195 198 678	2.805	198,082,675	2,574	187,644,340	2,780	185,445,489
		2,706	164,807,882	2,777	151,697,832	2,772	166,739,265	7,832	107,700,044	50,7	20,000,000		110 120 83	801	66 618 671	47	53,134,519	105	73,844,207
		53	62,358,066	84	57,530,136	79	32,814,091	201	616,176,88	2	116'16771	701	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 5	0301010	01.0	43 477 600	171	\$10 646 95
		116	701 374 17	340	889 900 07	191	48 854 266	388	48.603.791	16:	53,363,888	372	52,300,236	787	CC0,1CC,1C	270	20.00	2 !	
		9/6	41,703,150	100	000,000,000	5	007 -10 -1		117 964 701	2	157 664 441	95	173.785.878	28	138,378,782	99	150,157,942	62	144,387,940
		25	135,953,839	5	84,658,841	4	113,844,588	ī, '	500,400,111		200 134 14		000 079 73	,	12 952 000	•	38.969.560	S	17.670,000
		•	11.386.275	~	18,372,000	<u>.</u>	5,016,000	^	72,186,000	^	74,/11,000		000,000,00	٠.			000 100 55		10 070 800
3	31,440,600	7	28,101,800	-	3,924,000	3	17,444,000	-	16,404,000	r	52,161,400	3	25,738,400		77.781.700		004,187,62		2000
				L	200 011	01.5	784 774 566	107 194	846 717 911	191 062	1.056.648.530	387,690	1,155,485,684	391,154	1,078,125,117	384.215	1,026,732,807	389.290	937.582,850
66	5.427.398	387,699	386.797 995.427.398 387,699 888.557,728	388,021	776,643,744	334.310	207.11.40/	27420		4	-	L							

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 257

- Q-257. With regard to LG&E Purchased Power (Account 555) in Seelye Exhibit 23, Page 13, please provide:
 - (a) all workpapers and analyses showing the determination of total demand costs within the Account total of \$77,619,641; and,
 - (b) all workpapers and analyses showing the determination of total energy costs within the Account total of \$77,619,641).
- A-257. (a) The \$77,619,641 figure is functionally assigned on the OMPP in the cost of service study. See pages 13 and 43 of Seelye Exhibit 23.
 - (b) The \$77,619,641 figure is functionally assigned on the OMPP in the cost of service study. See pages 13 and 43 of Seelye Exhibit 23.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 258

- Q-258. With regard to LG&E Intercompany Sales of \$110,077,528 (Seelye Exhibit 24, Page 37), please provide:
 - (a) a detailed explanation along with all workpapers and analyses showing the pricing methodology (basis) and amount (units and dollars) for sales to affiliates; and,
 - (b) if not provided in (a) above, please provide the detailed determination of test year Intercompany sales (units and dollars) by month and by affiliate.
- A-258. See attached CD, in the folder titled Question No. 258.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 259

Responding Witness: Robert M. Conroy

- Q-259. Rate each LG&E rate schedule please provide a history of all base rates during the last 10-years. In this response please provide each rate element (e.g., customer charge, energy charge, demand charge, etc.) as well as the effective data of each base rate.
- A-259. A history of all base rate changes since 2000 can be found on the attached CD in folder titled Question No. 259. The attached documents contain the original and any revised tariff sheets for Electric Service contained in LG&E's Tariff Books P.S.C Electric No. 5, P.S.C. Electric No. 6, and P.S.C. Electric No. 7 for Natural Gas Service contained in LG&E's Tariff Books P.S.C Gas No. 5, P.S.C. Gas No. 6, and P.S.C. Gas No. 7.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 260

Responding Witness: Robert M. Conroy / William Steven Seelye

- Q-260. Please provide a table or matrix comparing each rate class in this filing with the rate classes shown in LG&E's last cost of service study in Docket No. 2008-00252 et.al. In this response please explain any consolidations and migrations.
- A-260. Please see the testimony of Robert M. Conroy and William Steven Seelye for the changes in rate schedules proposed in this proceeding and those in effect following the Commission's order in Case No. 2008-00252. In addition, please see the side-by-side tariff comparison contained behind Tab 8 in Volume 1 of LG&E's Application. A comparison of the current and proposed rates can also be found in Exhibit 7 (Electric) and Exhibit 10 (Gas) of Mr. Seelye's testimony.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 261

- Q-261. With regard to LG&E Seelye's direct testimony at Page 70, Lines 5 and 6, please provide all detailed SAS output reports including diagnostic statistics, confidence intervals, number of observations, coefficients, etc. regarding the statistical modeling developed in this case.
- A-261. The requested output reports can be found on the attached CD with these responses, in a folder titled Question No. 261.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 262

- Q-262. With regard to LG&E Seelye Exhibit 16, please explain what timing and size metrics the coefficients measure in terms of usage. In other words, do the coefficients relate to daily or monthly usage, sample size, or total class usage? If sample size, please explain in detail and provide all workpapers, analyses, and spreadsheets used to adjust from sample to population amounts.
- A-262. The coefficients relate to total class daily usage.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 263

- Q-263. Please provide all weather related data for all weather stations in LG&E's (or its Kentucky affiliates) possession (whether utilized or not in this case) in electronic format. Please provide in Microsoft Excel format if available. If not available in Excel format, please provide in ASCII, common delineated or fixed field format with all fields labeled or identified. In this response, include all weather stations for which data is available, all periods in which data in available, and all weather characteristics available (e.g., HDD, CDD, Max Temp, Min Temp, etc.).
- A-263. See attached CD in the folder titled Question No. 263.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 264

- Q-264. Please identify the weather station(s) utilized by Mr. Seelye to conduct his LG&E weather normalization analyses.
- A-264. Mr. Seelye utilized Standiford Field (SDF) weather station.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 265

Responding Witness: William Steven Seelye

- Q-265. With regard to Seelye LG&E Exhibit 16, please provide all input data (as selected) for each model in electronic format. Please provide in Microsoft Excel format if available. If Excel format is not available, please provide in ASCII common delineated or field format with all fields labeled or identified.
- A-265. See attached CD in the folder titled Question No. 265.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 266

Responding Witness: William Steven Seelye

Q-266. With regard to Seelye LG&E Exhibit 16:

- (a) please provide the Exhibit in executable Excel format (include all linked files); and,
- (b) using Class 1 (Residential), month 3 (2009) as an example, please explain in detail how the "HDD65" value of 113348 was obtained as well as how the "R-sq." value of 0.933 was obtained. In this response, please also explain how the load data sample was applied to the entire class (population).
- A-266. (a) See response to KPSC-2 Question No. 125.
 - (b) The value of 113348 was obtained from an ordinary least squares regression model. The load data for the entire population (either stratified from a sample or developed from census data) was used to derive the coefficients and to calculate the normalization adjustment.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 267

Responding Witness: William Steven Seelye

Q-267. With regard to Seelye LG&E Exhibit 17:

- (a) please provide the Exhibit in executable Excel format (include all linked files); and,
- (b) using Class 1 (Residential), month 3 (2009) as an example, please explain in detail how the "Adjustment (MWH)" value of 907 was obtained. In this response, please verify that the first column labeled "Adjustment (MWH)" relates to an HDD65 analysis and that the last column labeled "Adjustment (MWH)" relates to a CDD65 analysis. If this is not the case, please provide a detailed explanation of what each column represents.
- A-267. (a) See response to KPSC-2 Question No. 125.
 - (b) The value of 907 was obtained by multiplying the regression coefficient by the departure from the bandwidth boundary.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 268

- Q-268. With regard to Mr. Seelye's LG&E direct testimony Page 69, Line 27 though Page 70, Line 2, please explain in detail whether Mr. Seelye utilized the entire sample load research data available, or a subset of all sampled load research data observations (customer) in conducting his weather normalization regression analyses. If a subset of the total sampled load research data was utilized, please explain and provide all analyses showing how the selected sample reasonably reflects the usage characteristics of the class.
- A-268. The entire sample load research data was utilized.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 269

- Q-269. With regard to Mr. Seelye's LG&E direct testimony at Page 69, Line 29 through Page 70, Line 2, please provide in executable electronic format the "accurate load research data for all of the rate classes . . . [which] . . . meet the accuracy requirements that were set forth in Section 133 of the Public Utilities Regulatory Policy Act (PURPA)" referenced therein.
- A-269. See responses to Question No. 229 and Question No. 265.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 270

- Q-270. With regard to Mr. Seelye's LG&E direct testimony, Seelye Exhibit 8, please provide the following:
 - (a) a copy in executable Excel format (include all linked files),
 - (b) all the workpapers spreadsheets, source documents, etc. that support the amounts, assumptions and calculations incorporated therein; and,
 - (c) an explanation of what is represented therein and how these determinations are specifically used by KU, since there is no discussion in the text of the testimony regarding this Exhibit.
- A-270. (a)-(b) See response to KPSC-2 Question No. 125.
 - (c) The detailed information provided in response to KPSC-2 Question No. 125 includes descriptive labels.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 271

- Q-271. With regard to the LG&E Direct Testimony of Mr. Seelye, Page 37, Line 10 through Page 39, Line 5, please provide all workpapers, data, electronic computer models and spreadsheets, assumptions, calculations, etc. that show how the proposed class revenue percentage increases and the corresponding revenue dollar increases were determined.
- A-271. See response to KPSC-2 Question No. 125.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 272

- Q-272. Please provide a listing of the LG&E gas rate schedules that are included in each of the customer classes presented in the gas CCOSS; i.e., Residential (RGS), Commercial (CGS), Industrial (IGS), As-Available Gas Service (AAGS), Firm Transportation (FT), and Special Contracts (SP).
- A-272. See P.S.C Electric No. 8, as provided in Tab 8, Volume I of the Statutory Notice, Application, Financial Exhibit, Table of Contents, Filing Requirements filed with the Commission on January 29, 2010.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 273

- Q-273. With regard to Mr. Seelye's LG&E direct testimony, please provide a detailed explanation and support for the statement at Page 42, Line 8 that "A Straight Fixed Variable rate design is consistent with national energy policy."
- A-273. See page 53, lines 2-15, of Mr. Seelye's direct testimony.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 274

- Q-274. With regard to Mr. Seelye's LG&E direct testimony at Page 53, Lines 2 through 15, please provide a copy of the following:
 - (a) Federal Energy Independence and Security Act of 2007 (EISA 2007);
 - (b) Kentucky Public Service Commission Order in Case No. 2008-00408; and,
 - (c) National Association of Regulatory Utility Commissioners Resolution on Energy Efficiency and Innovative Rate Design, adopted November 16, 2005.
- A-274. See attached CD, in the folder titled Question No. 274.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 275

- Q-275. With regard to the LG&E direct testimony of Mr. Seelye, Exhibit 29, Pages 14 and 15, please provide all workpapers, data, electronic computer models and spreadsheets, assumptions, calculations, etc. showing how each of the allocation factors used in gas the CCOSS was developed. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-275. See response to KPSC-2 Question No. 125. Also, see attached CD, in the folder titled Question No. 275. Hard copies are not being provided due to the volume of the data requested.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 276

- Q-276. With regard to Seelye LG&E Exhibit 19:
 - (a) please provide the Exhibit in executable Excel format (include all linked files); and,
 - (b) please provide all workpapers, spreadsheets, assumptions, etc. that support each of the various components of the gas temperature normalization adjustments for Residential (Rate RGS), Commercial (Rate CGS), Industrial (Rate IGS), As Available Gas Service (Rate AAGS), Firm Transportation (Rate FT) and Special Contracts (SC) determined therein, including the determinations of actual and normal heating degree days, the development of net revenue per MCF sold, etc.
- A-276. See response to KPSC-2 Question No. 125.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 277

- Q-277. With regard to the LG&E direct testimony of Mr. Seelye, Page 102, Lines 7 through 9, please provide an executable computer spreadsheet of Seelye LG&E Exhibit 31, Gas Zero Intercept Distribution Mains analysis. Please include in the response all the workpapers, spreadsheets, source documents, etc. that support the amounts, assumptions, and calculations presented therein.
- A-277. See response to KPSC-2 Question No. 125.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 278

- Q-278. With regard to the LG&E direct testimony of Mr. Seelye at Page 96, Line 16 through Page 103, Line 23, please provide an executable computer spreadsheet of Mr. Seelye's LG&E gas class cost of service study presented in Exhibit 28 and 29.
- A-278. See response to KPSC-2 Question No. 125.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 279

Responding Witness: J. Clay Murphy

- Q-279. With regard to LG&E gas Special Contracts customers, please provide:
 - (a) the requirements and criteria for eligibility to be served under gas special contracts;
 - (b) the specific criteria and circumstances that exist for each Special Contract customers;
 - (c) all contracts with "special contracts" customers;
 - (d) all workpapers, analyses, internal memoranda, and correspondence regarding the threat of bypass, alternative fuel switching, and determination of rates charged to each Special Contract customer; and,
 - (e) an explanation of the monitoring and/or on-going evaluations, etc. that LG&E undertakes to validate the continued eligibility of special customers.
- A-279. a. When a standard tariff offering does not provide adequate flexibility to meet the needs of a particular customer's circumstance, then a special contract may be able to provide that flexibility. The ability to offer special contracts that incorporate rates and/or services not offered in LG&E's standard tariff offerings can allow LG&E to address a variety of customer-specific circumstances that it would not otherwise be able to address. LG&E does not enter into special contracts lightly or without careful consideration of the unique situation of the customer requesting special contract service.

The circumstances that support a special contract can vary by customer. By way of example, special contracts may provide a local distribution company with the ability to offer rates that discourages a current or potential customer from taking service directly from an interstate pipeline. Another way in which a special contract can be of use is in competing with the customer's ability to use alternate fuels. Still another use of a special contract is to ensure that the customer's revenue responsibility is commensurate with the

capacity and services that are being reserved to serve the customer. In order to meet the particular circumstances of the customer, the rates and provisions associated with each special contract may not be exactly the same.

b. As explained above, special contracts can be used to address circumstances that are unique to the customer requesting the special contract. Below are some of the unique circumstances associated with LG&E's special contract customers that reveal the criteria that support this customer receiving service under a special contract.

Fort Knox:

Fort Knox first became a special contract gas customer in 1942. The current Fort Knox special contract, which provides for transportation-only service, first became effective in 2005.

Fort Knox is located less than 5 miles from the interstate pipeline facilities of Texas Gas Transmission, LLC. Given its location and volume, Fort Knox is a candidate for bypass, and, therefore, for a special contract.

Fort Knox is served under a special contract which incorporates the terms and conditions associated with Rate FT, but not the one-part commodity-only rate structure of Rate FT. Instead, the Fort Knox special contract incorporates a cost-based two-part rate structure that includes a demand rate and a commodity rate, as well as a customer charge which three charges are derived from the unbundled cost elements of the commodity-only charge under Rate FT.

Importantly, this special contract allowed LG&E to retain this customer's load with little or no incremental capital investment. Fort Knox continues to make a contribution to LG&E's fixed costs. The special contract rates and provisions facilitate the continuance of that contribution to fixed costs, which costs would otherwise be borne by all other customers.

Ford Motor:

The current Ford Motor special contract, which includes both the facilities at Kentucky Truck Plant ("KTP") and the facilities at Louisville Assembly Plant ("LAP") provides for transportation-only service and became effective in 2000. These two facilities were previously served under separate special contracts in 1995 and 1996, respectively.

KTP is located about 3 miles from the interstate pipeline facilities of Texas Gas Transmission, LLC. LAP is located about 1 mile from the interstate

pipeline facilities of Texas Gas Transmission, LLC. Given the volumes of gas used by each facility and the location of each facility, both facilities are candidates for bypass, and therefore, a special contract.

Ford Motor is served under a special contract which incorporates the terms and conditions associated with Rate FT, but not the one-part commodity-only rate structure of Rate FT. Instead, the Ford Motor special contract incorporates a one-part commodity rate with a customer charge and an annual minimum bill requirement.

Importantly, LG&E retained the loads of both Ford Motor facilities with little or no incremental capital investment. Ford Motor continues to make a contribution to LG&E's fixed costs. The special contract rates and provisions facilitate the continuance of that contribution to fixed costs, which costs would otherwise be borne by all other customers.

By letter dated March 31, 2009, Ford Motor Company exercised its right to terminate the special contract effective April 1, 2010, by providing the required one year prior written notice. Pursuant to Ford Motor's request, the Kentucky Truck Plant and its Louisville Assembly Plant will take service under standard Rate Schedule FT beginning April 1, 2010.

E. I. DuPont de Nemours:

E. I. DuPont de Nemours ("DuPont) first became a special contract gas customer in 1994. The current special contract, which provides for transportation-only service became effective in 1997.

The circumstances and criteria that support the DuPont special contract are different from those that support the Fort Knox and Ford Motor special contracts. The DuPont special contract was developed to serve a new load that previously had not been served by LG&E, not an existing load at risk of bypassing LG&E. Prior to the special contract, DuPont utilized coal to meet its steam needs at the Louisville Plant. DuPont was considering two options at the time it requested the special contract: either replacing its aging coalfired boilers and continuing to utilize coal or installing gas-fired boilers and utilizing natural gas. The fuel cost associated with natural gas was presumably higher than that of coal. The special contract rate that LG&E offered to DuPont apparently satisfied DuPont's total financial requirements for the project at the time and DuPont made the decision to install gas-fired boilers. Given the large volume for the facility and the incremental nature of the load served under the special contact, and the fact that the customer could have chosen an alternate fuel, makes it a candidate for a special contract.

DuPont is served under a special contract which incorporates the terms and conditions associated with Rate FT, but not the one-part commodity-only rate structure of Rate FT. Instead, the DuPont special contract incorporates a cost-based two-part rate structure that includes a demand rate and a commodity rate, as well as a customer charge which three charges are derived from the unbundled cost elements of the commodity-only charge under Rate FT.

Importantly, LG&E achieved this incremental throughput with little or no incremental capital investment. DuPont continues to make a contribution to LG&E's fixed costs. The special contract rates and provisions facilitate the continuance of that contribution to fixed costs, which costs would otherwise be borne by all other customers.

Electric Generation:

The special contract between LG&E's gas business and the electric generation businesses of LG&E and KU first became effective in 2008. Prior to that date, these electric generation facilities were being charged only for the cost of gas that they consumed, and there was no contract defining the terms and conditions of service or charges for the services provided.

LG&E serves three LG&E/KU electric generation facilities under a single special contract. The Mill Creek and Cane Run power plants are provided with sales service, while the Paddy's Run facility is provide with transportation-only service.

Electric Generation is served under a special contract which incorporates the terms and conditions associated with Rate FT, but instead of a one-part commodity-only rate, the Electric Generation special contract incorporates a cost-based two-part rate structure that includes a demand rate and a commodity rate, as well as a customer charge, which three charges are derived from the unbundled cost elements of the commodity-only charge under Rate FT for Paddy's Run and commodity-only charge under Rate IGS for Mill Creek and Cane Run. In addition to the two-part rate structure, the contract includes special operating parameters associated with each plant.

A special contract was determined to be appropriate for the three electric generation facilities of this customer because of the unique load profiles of these facilities as compared to other gas customers who receive gas service under standard tariffs. The amount of capacity held on LG&E's gas system to meet the potential maximum daily requirements is very high relative to the annual throughput. A commodity-only rate would not have adequately reflected the cost of holding that daily capacity available and resulted in

other gas customers paying for the capacity that is held to serve electric generation loads.

Importantly, LG&E serves the loads of this customer's facilities with only a modest incremental capital investment. Electric Generation makes a contribution to LG&E's fixed costs. The special contract rates and provisions facilitate the continuance of that contribution to fixed costs, which costs would otherwise be borne by all other customers.

c. Attached are copies of the following special contracts and associated documents:

Fort Knox:

- Transmittal letter regarding Fort Knox Special Contract
- Affidavits of Fort Knox indicating that absent a special contract it would bypass
- Special Contract with Fort Knox approved by the Commission

Ford Motor:

- Transmittal letters regarding Ford Motor Special Contract
- Affidavit of Ford Motor indicating that absent a special contract it would bypass
- Letters approving confidential treatment of Ford Motor Special Contract
- Public Version (redacted) of the Special Contract with Ford Motor approved by the Commission
- Letter from Ford Motor Company terminating the special contract

E. I. DuPont de Nemours:

- Transmittal letter for DuPont Special Contract
- Special Contract with DuPont approved by the Commission

Electric Generation:

- Transmittal letter with Public Version (redacted) of the Special Contract for Electric Generation
- Commission data request and response of LG&E/KU
- Letter approving confidential treatment of Special Contract with Electric Generation
- Order approving the Special Contract in Case No. 2007-00449

- d. The customer files associated with each of these special contracts are voluminous. This information is available for inspection and review at the offices of LG&E.
- e. None of the circumstances which originally prompted the offering of the special contract to each of these customers has materially changed. Therefore, no changes, other than the changes proposed in this proceeding, are warranted at this time.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

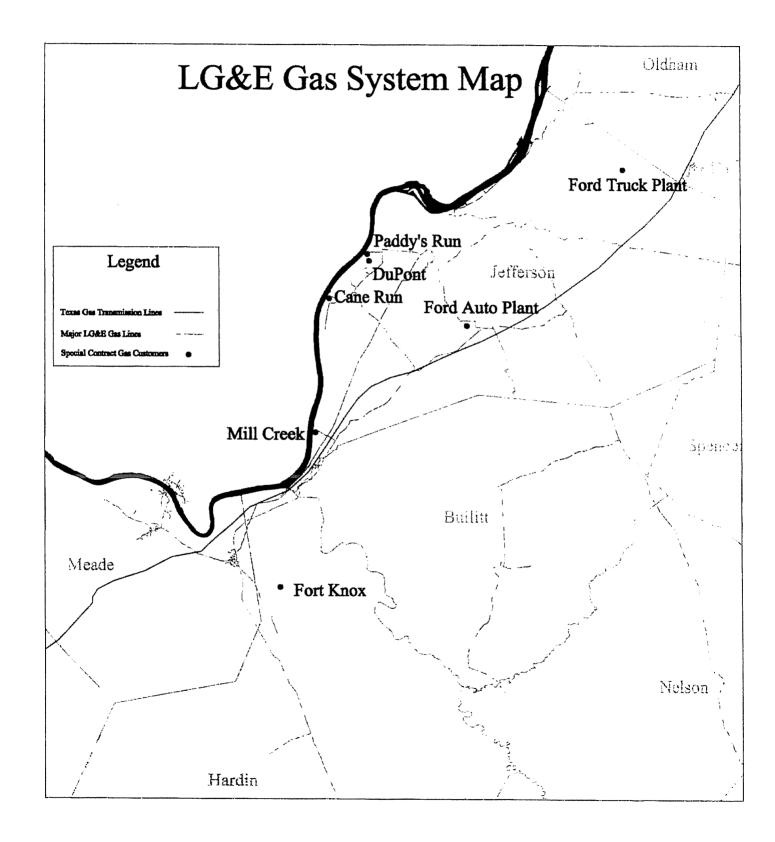
Question No. 280

Responding Witnesses: William Steven Seelye/J. Clay Murphy

- Q-280. With regard to LG&E gas Special Contract customers:
 - (a) please explain and reconcile the rates and amounts in:
 - (i) Seelye LG&E Exhibit 8, Pages 8 and 9;
 - (ii) Seelye LG&E Exhibit 9; and,
 - (iii) "Summary of Proposed Changes Under Gas Special Contracts" provided in Tab 7 of 807KAR5:001 Section 10(a)7.
 - (b) please explain if each Special Contracts customer is served directly from LG&E's transmission system, high pressure distribution system or low pressure distribution system;
 - (c) please explain in detail what facilities are served under the Intra-Company Special Contracts shown in Page B of Seelye Exhibit 8, as well as the bases for the Unit Charges shown therein; and,
 - (d) please provide a map or schematic showing each Special Contracts customer with LG&E transmission and distribution Mains.
- A-280. (a) See response to KPSC-2 Question No. 125. The exhibits are descriptive.
 - (b) The Special Contracts are served directly from the gas transmission or high pressure distribution systems.
 - (c) The electric generation facilities served with natural gas under the intracompany special contract are Paddy's Run, Cane Run and Mill Creek. The Distribution Cost Component and Demand Charges shown on Exhibit 8 were approved by the Commission in Case No. 2007-00449, in its Order dated April 11, 2008.

Response to Question No. 280 Page 2 of 2 Seelye/Murphy

(d) Attached is an overview map of LG&E's gas service territory showing each special contract customer in relation to the facilities of Texas Gas Transmission, LLC, the interstate pipeline from which certain customers could potentially receive service directly. Other, more detailed maps as requested are protected from public disclosure as critical infrastructure information pursuant to federal and state law and therefore are not attached. Copies of those maps may be examined in the offices of LG&E upon request of counsel.



CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 281

Responding Witness: William Steven Seelye

- Q-281. For each LG&E gas customer taking service from the high pressure system, please provide:
 - (a) rate schedule;
 - (b) test year sales volume;
 - (c) test year transportation volume;
 - (d) size of Main at customer connection;
 - (e) contract demand (as applicable); and,
 - (f) pressure at the low side of the regulator at the location(s) where the customer is taking service.

Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-281. Please see the attached CD in the folder titled Question No. 281. A petition for confidential treatment of attachment Question No. 281 is being filed concurrently herewith.

For subpart (d), the information has not been compiled and is therefore not available.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 282

Responding Witness: J. Clay Murphy

- O-282. With regard to LG&E gas storage, please provide:
 - (a) test year total injections and withdrawals of LG&E owned gas;
 - (b) test year total injections and withdrawals of customer-owned gas by distribution customer served by the LG&E gas system; and,
 - (c) test year total injections and withdrawals of gas owned for the use of customers not served by the LG&E distribution system (i.e., off-system customers).
- A-282. (a) For the 12 months ended October 31, 2009, LG&E's financial operating reports indicate that LG&E injected 12,580,889 Mcf into its on-system storage facilities. For the 12 months ended October 31, 2009, LG&E's financial reports indicate that LG&E withdrew 11,904,564 Mcf from its on-system storage facilities.
 - LG&E's financial operating reports set forth the total of all injections and the total of all withdrawals during a given month. Injections and withdrawals for a given day are not netted to produce a single daily volume, but instead are accumulated by either injection or withdrawal activity.
 - (b) LG&E does not provide storage services for gas owned by distribution customers served by the LG&E gas system.
 - (c) LG&E has not provided storage services for gas owned by customers not served by the LG&E gas system (i.e., off-system customers).

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 283

Responding Witnesses: J. Clay Murphy/William Steven Seelye

- Q-283. With regard to Seelye LG&E Exhibit 30, please provide:
 - (a) an explanation including support for the design day average temperature of -12 degrees; and,
 - (b) explain and provide all workpapers and analyses showing how the implicit design day demands for high pressure customers was determined; i.e., the differences between "Demands-High Pressure Distribution System" and "Demands-Low and Medium Pressure Distribution System.
- A-283. (a) The -12 design day represents an extreme weather occurrence used by LG&E to plan the operation of its gas system. It reflects the maximum HDD that could reasonably occur in the tail region of a probability distribution function. For the gas day of January 18, 1994, LG&E experienced an actual average hourly temperature of -12 degrees Fahrenheit.
 - (b) See response to KPSC-2 Question No. 125. The spreadsheets provided therein are descriptive.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 284

- Q-284. Please provide monthly gas sales and transportation (separately) customers and volumes by month for the test year. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-284. See response to KPSC-2 Question No. 125. Hard copies are not being provided due to the volume of the data requested.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 285

- Q-285. Please provide Seelye Exhibit 31 (Gas Zero Intercept Distribution Mains) in executable Excel format (include all linked files). Please include in this response all the workpapers, spreadsheets, source documents, etc. that supports the figures, assumptions, and calculations incorporated therein.
- A-285. See response to KPSC-2 Question No. 125.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 286

Responding Witness: William Steven Seelye

- Q-286. Please provide the following separated between high pressure Mains and medium/low pressure Mains (as available) by vintage year, size, and type (plastic, steel, cast iron, etc.) for LG&E gas Account 376 in the greatest level of detail available:
 - (a) installed footage;
 - (b) gross investment;
 - (c) materials investment;
 - (d) capitalized labor; and,
 - (e) Handy-Whitman Cost Index.

If all data is not available for all years, please provide the level of detail that is available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).

A-286. The information requested is not available. See response to KPSC-2 Question No. 125 for related information.

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LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 287

Responding Witness: J. Clay Murphy

- Q-287. For each of the ten highest LG&E gas distribution system daily sendouts during the test year, please provide the following:
 - (a) date;

(a)

- (b) daily distribution system volume;
- (c) volumes by rate schedule for those customers metered on a daily basis; and,

(c-1)

(d) distribution system curtailments (if any).

(b)

A-287. Below is a table showing the requested information for LG&E's ten highest gas distribution system daily sendouts during the test year. All volumes are in Mcf.

	_	DAILY MI CUSTO		SYSTEM
	TOTAL	RATE	SPECIAL	CURTAIL-
DATE	SEND-OUT	FT	CONTRACTS	MENTS
5 04 0000		0.5.040	40.000	
Dec. 21, 2008	399,926	25,649	16,082	0
Dec. 22, 2008	366,891	27,753	15,877	0
Jan. 13, 2009	355,317	32,777	20,305	0
Jan. 14, 2009	377,283	34,491	23,282	0
Jan. 15, 2009	484,199	37,382	27,399	0
Jan. 16, 2009	427,338	32,023	21,009	0
Jan. 20, 2009	383,752	37,365	21,692	0
Jan. 25, 2009	352,104	25,749	22,234	0
Feb. 3, 2009	415,782	33,911	22,342	0
Feb. 4, 2009	418,905	33,127	27,619	0

Only customers served under Rate FT and special contracts are required to have daily metering.

Response to Question No. 287
Page 2 of 2
Murphy

There were no curtailments of sales service on any of the dates indicated above. However, LG&E did have an Operational Flow Order ("OFO") in effect applicable to customers served under Rate FT and transportation-only special contracts for the following days: January 14, 15, 16, and February 4, 2009. In each case, the OFO directed each affected gas transportation customer to deliver to LG&E an amount of gas no less than the amount of gas being consumed at the customer's facility.

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 288

Responding Witness: Shannon L. Charnas

Q-288. Please provide LG&E adjusted test year gas General plant by FERC account.

A-288. See attached.

LOUISVILLE GAS & ELECTRIC COMPANY GENERAL PLANT IN SERVICE - GAS OCTOBER 2009

Account	 TOTAL
G392.10-Transportation Equip-Car/Trailers	\$ 1,864,458
G392.20-Transportation Equip-Trailers	451,395
G394.00-Tools, Shop, and Garage Equipment	3,969,952
G395.00-Laboratory Equipment	430,027
G396.10-Power Op Equip-Hourly Rated	2,433,201
G396.20-Power Op Equip - Other	47,955
Total General Gas Plant in Service - KY	\$ 9,196,988

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 289

Responding Witness: Shannon L. Charnas

- Q-289. Please provide LG&E gas adjusted test year CWIP in the greatest detail available. Please provide in hard copy as well as in Microsoft readable electronic format (preferably Microsoft Excel).
- A-289. See attached for the total Company balances. The requested information is also on the attached CD, in folder titled Question No. 289.

LGE 107001 Gas CWIP Balance As of October 31, 2009

Description	Amount
CAPITAL PIPE TRANSFERS - MULDRAUGH	\$ 73,331.41
CAPITAL GAS TOOLS	173,699.97
GAS BLANKET	259,584.91
PURCHASE SERVICE REGULATORS FOR INDUSTRIAL CUSTOMERS	334,305.33
PLUG AND REPAIR GAS STORAGE WELLS	48,982.73
ENHANCE DOE RUN GAS RECOVERY SYSTEM	53,058.82
ENHANCE DOE RUN SHALE GAS RECOVERY SYSTEM	840,037.78
RELINING GAS STORAGE WELLS	28,971.36
PURCHASE REGULATORS - RESID. & COMMER.	819,808.53
FARM TAP REGULATOR UPGRADE	4,993,268.46
PURCHASE ANODES/RECTIFIERS	101,219.12
RIVER PARK PLACE 16-INCH HIGH PRESSURE PIPELINE RELOCATION	(1,214.91)
MULDRAUGH ENGINE COOLING IMPROVEMENT	62,084.02
MULDRAUGH SPCC COMPLIANCE - PHASE I	619,109.47
MULDRAUGH STORGE PIPELINE REPLACEMENT	49,740.39
CUSTOMER FT RATE CONVERSION PROJECTS	2,455.36
COMMERCIAL HP GAS SERVICE REPLACEMENT PROGRAM	59,629.92
MAGNOLIA - EMERGENCY PIPELINE AND EQUIPMENT REPAIR	71,131.63
MAGNOLIA - SPCC REQUIRED CAPITAL PROJECTS	65,946.56
RELINE GAS STORAGE WELLS	361,866.49
CAPITAL SALES TAX ENTRY	(84.23)
RECONSTRUCT WATERSIDE GAS FACILITIES	450.64
LGE GAS METERS	14,257.16
BARDSTOWN, KY HP REGULATOR STATION	295,353.32
FT RATE GAS CUSTOMER CONVERSION PROJECTS	434.44
MULDRAUGH PURIFIER 2 BOILER BUILDING RETROFIT	180,282.87
MULDRAUGH ENGINE COOLING REPLACEMENTS	66,977.08
MULDRAUGH SPCC COMPLIANCE PHASE II	292,507.49
CP IMPRESSED CURRENT SYSTEM	20,461.33
REFINE WELLS WITH CORRODED CASING	492,868.47
MAGNOLIA EMERGENCY PIPELINE & EQUIPMENT	81,834.26
GAS MAIN HIGHWAY RELOCATIONS-ASC	(528,791.21)
MULDRAUGH ACID RIG IMPROVEMENTS	1,180.75
DOE RUN SHALE GAS RECOVERY SYSTEM EXPANSION	3,443,652.77
DOE RUN INDIANA 8-INCH PIPELINE PROJECT	454,200.27
REGULATOR CAPACITY	77,244.09
BARDSTOWN STATION AUTOMATIC GATE	54,910.85
CORRODED SERVICE LINE REPLACEMENT	212,427.82
UPS AIRPORT EXPANSION PROJ ASHBOTTOM ROAD	(4,990.66)
MULDRAUGH STATION REDUNDANT AMINE PUMP	361,694.67
REPLACE OLD LEAKING METERS AT FOUR SCHOOLS	17,221.60
EXISTING CUSTOMER FT RATE GAS CONVERSION PROJECTS	10,882.41
MAGNOLIA REPAIR/REPLACE DEF EQUIPMENT 2009	105,324.78
MAGNOLIA GROUNDWATER PROTECTION PROJECTS 2009	29,083.35

LGE 107001 Gas CWIP Balance As of October 31, 2009

Description	<u>Amount</u>
MAGNOLIA TEMPERATURE CONTROL FOR #1 PURIFIER LEAN AMINE	111,487.99
MAGNOLIA REPL MUFFLERS AND EXPANSION JOINTS ON ENGINE #6	27,835.21
MAGNOLIA EMERGENCY EQUIPMENT & REPAIRS	57,245.56
MAGNOLIA BARE STEEL GATHERINGS LINES MAGNOLIA & CENTER	48,783.85
MULDRAUGH STATION AUXILIARY BUILDING REPLACEMENT	1,116,867.89
MULDRAUGH HYDRAULIC MOTORS FOR ENGINES #4 AND #5	19,479.86
MULDRAUGH PURIFIER 1 BOOSTER PUMP	48,527.35
MULDRAUGH OXIDIZER AUTOMATION	8,803.73
MULDRAUGH FACILITY IMPROVEMENTS	66,221.10
MULDRAUGH H25 UNIT REPLACEMENT	109,931.35
MULDRAUGH COOLER HANDRAILS	5,135.75
MULDRAUGH PLC REPLACEMENT	54,135.02
MULDRAUGH PURIFIER 2 REFLUX PUMP	64,387.75
MULDRAUGH STATION PIPING	88,735.04
MULDRAUGH VALVE ACTUATOR REPLACEMENT	74,100.47
MULDRAUGH ACID RIG IMPROVEMENTS	19,758.31
STORAGE PIPELINE REPL MULDRAUGH	21,757.61
INSTALL GATE VALVES ON STORAGE WELLS	226,874.71
PLUG & REPAIR WELLS WITH CORRODED CASING	72,438.17
RELINE GAS STORAGE WELLS	267,958.55
CORROSION WORK SERVICE LINE REPLACEMENT	53,373.03
CP IMPRESSED CURRENT SYSTEM IMPROVEMENTS	48,626.99
PI ACT COMPLIANCE RCVS	14,522.73
UPGRADE BUILDINGS AT MAJOR STATIONS	49,543.67
UPGRADE FACILITIES AT CITY GATE STATIONS	22,272.00
UPGRADE ODORANT SYSTEM CONTROLLERS & PUMPS	39,909.79
UPGRADE GAS CONTROL SCADA SYSTEM	167,641.23
COMMERIAL HP GAS SERVICE REPLACEMENT	114,076.39
REGULATOR CAPACITY PROJECT	34,829.84
REGULATOR RELIEF CAPACITY PROJECT	128,258.64
IN-LINE INSPECTION CAPITAL IMPROVEMENTS CALVARY LINE	1,759,344.30
MULDRAUGH ENGINE COOLING	37,367.29
KY HWY 480 PHASE I GAS RELOCATION-PUBLIC WORKS PROJECTS	(44,406.60)
KENTUCKY HYW 22 (PHASE 2) FROM CHAMBERLAIN LN TO KY HWY 1694	251,675.29
GAS MANAGEMENT RELOCATION PROJECT	(279,036.90)
REGULATOR ASSEMBLIES RC419	134,328.65
GAS DISTRIBUTION COMPLIANCE	83,713.31
GAS MAIN EXTENSION 406	93,007.16
LARGE SCALE MAIN REPL.	12,240,806.79
ELECTRIC / GAS MANHOLE CONFLICT	2,468.48
NEW BUSINESS GAS SERVICE 341	1,429,926.35
NEW BUS GAS SERV 402	824,819.41
NEW BUS GAS SERV 418	(1,208.30)
PUBLIC WORKS GAS 406	2,505,194.01

LGE 107001 Gas CWIP Balance As of October 31, 2009

Description	Amount
PUBLIC WORKS 422 GAS	4,670.45
GAS DIST. MAIN MATERIAL	175,188.56
PRIORITY MAIN REPLACEMENT	993,754.64
CUSTOMER REQUESTED GAS 406	61,759.77
SYSTEM ENHANCE. GAS	219,780.30
MISC. GAS MAIN LEAK REPAIR/REPLACEMENT	242,084.91
PURCHASE TOOLS 419	37,384.73
TOOLS AND EQUIPMENT 447	222,912.03
TOOLS AND EQUIPMENT 448	68,363.82
TOOLS & EQUIPMENT 450	37,909.83
TOOLS & EQUIPMENT 004510	9,593.00
	\$ 38,991,322.53

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 290

Responding Witness: Shannon L. Charnas

- Q-290. Please provide LG&E gas adjusted test year depreciation reserve and depreciation expense by FERC account.
- A-290. See attached.

Louisville Gas & Electric Company Depreciation Reserve and Expense - Gas As of October 31, 2009

Account Gas Distribution		Reserve	•	Test Year Expense
	\$	(77.246)		
G374.22-Other Distribution Land Rights	Ф	(77,346)		
G375.10-City Gate Check Station Structures G375.20-Other Distribution Structures		(135,840)		
		(119,407)		
G376.00-Mains		(105,703,952)		
G378.00-Measuring and Regulating Station-General G379.00-Measuring & Regulating Station-City Gate		(2,423,753)		
Stations		(1,580,917)		
G380.00-Services		(63,464,756)		
G381.00-Meters		(4,506,185)		
G383.00-Regulators		(932,575)		
G385.00-Industrial Measuring and Regulating Station		, ,		
Equipment		(112,805)		
G387.00-Other Equipment		(14,649)		
G388.05-ARO Cost Gas Dist (L/B)		(176)		
G388.07-ARO Cost Gas Dist (Eqp)		(20,151)		
	\$	(179,092,512)	\$	13,342,344
Gas General Plant				
G392.10-Transportation Equipment-Cars/Trucks	\$	(1,866,147)		
G392.20-Transportation Equipment-Trailers		(177,699)		
G394.00-Tools, Shop, and Garage Equipment		(1,407,274)		
G395.00-Laboratory Equipment		(404,607)		
G396.10-Power Operated Equipment-Hourly Rated		(2,315,394)		
G396.20-Power Op Equipment - Other		(31,631)		
	\$	(6,202,752)	\$	352,364
Gas Intangible Plant				
G302.00-Franchises and Consents	\$	(800)		
	\$	(800)		

Louisville Gas & Electric Company Depreciation Reserve and Expense - Gas As of October 31, 2009

	Reserve		Test Year Expense
\$	` ,		
	(841,409)		
	(14,636)		
	(864,587)		
	(569,590)		
	(452,027)		
	(7,580,043)		
	(2,579,462)		
	(802,482)		
	(7,418,596)		
	(5,373,962)		
	(270,697)		
	(4,934,967)		
	(272,177)		
	(1,961)		
	(398,897)		
\$	(32,445,944)	\$	1,099,437
\$	(207,547)		
	(11,996,928)		
\$	(12,204,475)	\$	91,870
<u> </u>	(229.946.483)		14,886,015
	\$	\$ (70,451.45) (841,409) (14,636) (864,587) (569,590) (452,027) (7,580,043) (2,579,462) (802,482) (7,418,596) (5,373,962) (270,697) (4,934,967) (272,177) (1,961) (398,897) \$ (32,445,944) \$ (207,547) (11,996,928) \$ (12,204,475)	\$ (70,451.45) (841,409) (14,636) (864,587) (569,590) (452,027) (7,580,043) (2,579,462) (802,482) (7,418,596) (5,373,962) (270,697) (4,934,967) (272,177) (1,961) (398,897) \$ (32,445,944) \$ \$ (207,547) (11,996,928) \$ (12,204,475) \$

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CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 291

Responding Witnesses: Valerie L. Scott

- Q-291. Please provide all LG&E gas calculated, actual, or estimated uncollectible expense by customer class.
- A-291. This information is not available. The Company does not maintain uncollectible expense by customer class.

Please see the Company's response to KPSC-1 Question No. 35 for additional information.

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 292

Responding Witness: Butch Cockerill

- Q-292. Please provide actual and estimated LG&E gas meter reads by class during the test year.
- A-292. See table below.

`	Number of	Number of
Rate Schedule	Actual Reads	Estimated Reads
As Available Gas Service	306	77
Commercial Gas Service - FT	2	2
Commercial Gas Service	134,486	5,014
Commercial Interruptible (no rate category in CCS)	5	1
Commrcial Gas Service	192,886	3,807
Company Use	42	8
Firm Transport	1,169	1,158
Industrial Gas - Reg Gts G-6 (No Rate Category In Ccs)	4	0
Industrial Gas - Uncommitted G-7 (No Rate Category In Ccs)	8	0
Industrial Gas Service - FT	9	8
Industrial Gas Service	3,170	166
Residential Gas Service	3,611,253	89,543
Special Contract - Bullit Farm RSG	7	0
Special Contract - Cane Run/Mill Creek	2	. 2
Special Contract - Fort Knox	8	8
Special Contract - Paddys	1	1
Temp Suspension - Commercial	3,269	144
Temp Suspension - Company Use	325	50
Temp Suspension - Industrial	21	0
Temp Suspension - Residential	11,821	633
Transport Service	105	15
Volunteer Fire Department	48	0
Total	3,958,947	100,637

CASE NO. 2009-00549

Response to Attorney General's Initial Requests for Information Dated March 1, 2010

Question No. 293

Responding Witness: William Steven Seelye

- Q-293. Please provide the following LG&E Exhibits associated with the gas operations filing in executable excel format (include all liked files):
 - (a) Seelye Exhibit 9;
 - (b) Seelye Exhibit 10;
 - (c) Seelye Exhibit 13;
 - (d) Seelye Exhibit 21; and,
 - (e) Seelye Exhibit 30.

Please include in this response all the workpapers, spreadsheets, source documents, etc., that support the amounts, assumptions, and calculations presented in these Exhibits.

A-293. See response to KPSC-2 Question No. 125.