

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| APPLICATION OF LOUISVILLE GAS AND |) | |
| ELECTRIC COMPANY AND KENTUCKY |) | |
| UTILITIES COMPANY TO INSTALL AND |) | |
| OPERATE ELECTRIC CHARGING STATIONS IN |) | |
| THEIR CERTIFIED TERRITORIES, FOR |) | |
| APPROVAL OF AN ELECTRIC VEHICLE |) | CASE NO. |
| SUPPLY EQUIPMENT RIDER, AN ELECTRIC |) | 2015-00355 |
| VEHICLE SUPPLY EQUIPMENT RATE, AN |) | |
| ELECTRIC VEHICLE CHARGING RATE, |) | |
| DEPRECIATION RATE, AND FOR A DEVIATION |) | |
| FROM THE REQUIREMENTS OF CERTAIN |) | |
| COMMISSION REGULATIONS |) | |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company and Kentucky Utilities Company (jointly, "Companies"), pursuant to 807 KAR 5:001, are to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due within 14 days of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and

accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Companies shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Companies fail or refuse to furnish all or part of the requested information, the Companies shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the Companies shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Companies' November 13, 2015 Application ("Application"), page 4, numbered paragraph 7, which states that there are 21 electric vehicle charging stations ("charging stations") in the Companies' combined territories. The 21 charging stations are listed in the Direct Testimony of David E. Huff ("Huff Testimony"), Exhibit DEH-1.

- a. State the number of charging stations in each company's territory.
- b. If known, identify the owners of the 21 charging stations.

c. State at whose expense the 21 charging stations were installed and are currently being maintained.

d. Explain how the Companies meter and bill for the energy used at the 21 charging stations.

2. Refer to the Application, page 5, numbered paragraphs 9.a. and b., which state that the charging station site host will pay the installation costs and that the costs will vary depending on the site location. If the installation costs are expected to differ from those provided in the Direct Testimony of Rick E. Lovekamp ("Lovekamp Testimony"), Exhibits REL-1 and REL-2, page 6 of 6 of each exhibit, provide a sample calculation of the anticipated installation costs of a typical charging station for a site host under the Electric Vehicle Supply Equipment ("EVSE") and the Electric Vehicle Supply Equipment Rider ("EVSE-R") tariffs.

3. Refer to the Application, pages 7–8, numbered paragraph 13. Beginning at the bottom of page 7, it states that "[m]oreover, as to the charging stations operating under Rider EVSE-R and Rate EVSE, station site hosts will pay all station installation costs when charging station is installed and will pay at least one-half of the cost of the charging station over the term of the service agreement."

a. Confirm that the tariffs are designed for the site host to pay one-half of the cost of the charging station over the term of the service agreement because the service agreement has a five-year term and the useful life of the charging station is 10 years. If this cannot be confirmed, explain.

b. Provide a copy of the intended service agreement and state whether the agreement will be uniform for all site hosts under the EVSE and EVSE-R tariffs.

4. Refer to the Application, Exhibit 1, proposed Electric Vehicle Charging (“EVC”) tariff. State whether the terms and conditions of the EVC tariff will be posted at the charging stations. If not, explain why they will not be posted.

5. Refer to the Application, Exhibit 2, the letter containing Mr. John Spanos’s recommendation for the depreciation rate for charging stations, which refers to “the estimates of comparable facilities within the industry.” Provide a list of the comparable facilities referenced which includes the depreciation rates for those facilities, and which identifies whether those rates were developed by Mr. Spanos or his firm.

6. Refer to the Application, Exhibit 3, the Huff Testimony. Page 3, lines 7 and 8, indicate that the Companies have been approached by customers and local governments about offering charging stations for electric vehicles. Provide detailed information quantifying the number of inquiries per year, how many of the inquiries were from individual vehicle owners, potential charging station owners, and local governments, and the specific nature of the interest expressed.

7. Explain whether one site host can request multiple charging stations at a particular location.

8. Refer to the Huff Testimony, page 6.

a. Line 7 states that the Companies intend to offer Level 2 charging stations. Identify the different levels of charging stations available and explain why Level 2 charging stations were chosen.

b. Lines 8–9 state that a Level 2 station typically adds about 10 to 20 miles of range per hour of charging time. Confirm that the 10–20 mile range per hour is the total range added for each hour of charging at a Level 2 charging station. If this cannot be confirmed, provide the total range per hour of charging time for a Level 2 charging station.

c. Explain why the Companies are not proposing to install fast charging stations under the EVC tariff along interstates or major roadways.

d. Lines 14–20 discuss the request for proposals and the analysis performed in selecting ChargePoint, Inc. as the contractor to assist in matters related to the charging stations. Provide:

- (1) the request for proposals issued in November 2014;
- (2) the responses provided by the ten vendors; and
- (3) the analysis that was performed which resulted in the selection of ChargePoint, Inc.

9. Refer to the Huff Testimony, page 8, lines 11–13. Explain the restriction for a customer receiving service under the General Service Schedule to have a monthly energy usage of 500 kWh or higher in order to be eligible.

10. Refer to the Huff Testimony, page 9, lines 5–6, which state that the Companies expect to operate no more than 10 charging stations under rate EVC in each of their service territories. State whether the Companies are merely stating their expectations or are requesting that the Commission place a limit of 10 on the number of charging stations to be installed.

11. Refer to the Huff Testimony, page 11.

a. Refer to lines 18–19. State whether notice will be posted at the charging stations that a user terminating a charging session before an hour has elapsed will be assessed the entire fee for the hour.

b. Explain the reasons for choosing fees based only on hourly increments for charging sessions.

c. State whether other charging session increments were considered. If so, state what increments were considered and why they were not chosen.

d. State whether customers can select and preset their charging times so as to utilize only and exactly full hour sessions.

e. Refer to lines 22–23. Identify the methods by which the Companies will market the charging stations under the EVSE, EVSE-R, and EVC tariffs, and the anticipated cost of each method.

12. Refer to the Huff Testimony, Exhibit DEH-3. Confirm that the picture at the top of the page which shows “LG&E KU Session Costs” shows an amount other than that included in any of the proposed tariffs because the picture was provided for illustrative purposes.

13. Refer to the Application, Exhibit 4, the Lovekamp Testimony, page 4, lines 5–7. Identify and describe the services to be provided for which the companies will pay:

a. the energy management fee; and

b. the networking service plan fee.

14. Refer to the Lovekamp Testimony, page 7.

a. Refer to lines 15–16. Explain whether the fuel adjustment clause (“FAC”) charge applicable to the assumed energy usage will be included and appear on

the customer's bill as part of the regular FAC charge, as a separate line item, or be subsumed within the EVSE-R charge.

b. Refer to lines 19–20. Explain how the five-year term requirement for the service agreement was determined.

15. Refer to the Lovekamp Testimony, pages 7–8. Beginning on page 7, line 21, and continuing on page 8, Mr. Lovekamp discusses the Companies' request for a deviation from 807 KAR 5:006, Section 14(4) related to the time requirement for a new service connection. State the amount of time that is expected to be required to install a charging station under each of the EVSE and EVSE-R tariffs.

16. Refer to the Lovekamp Testimony, page 8, lines 13–19, and Exhibit 1 of the Application, the tariffs for Rates EVSE and EVSE-R, paragraph No. 8, under "Terms and Conditions." These all state that the site host may assess a fee for the charging station to recover the cost of service and installation costs, but cannot profit from the resale of electricity.

a. Explain how the prohibition on profiting from the resale of electricity will be enforced by the Companies.

b. The testimony refers to the proposal as being similar to the approach the Companies apply to landlord-tenant arrangements in which a landlord bills a tenant for electric service. Describe in detail the Companies' approach in situations involving landlords billing tenants for electric service.

17. Refer to the Lovekamp Testimony, pages 8–9. Beginning at line 21 on page 8, Mr. Lovekamp discusses the EVC tariff and the Companies' request to provide charging services directly to the public. An example is provided in which an agreement

is entered into with a local governmental unit to locate a charging station on public property. Explain whether the Companies envision that charging stations installed under the EVC tariff will be limited to agreements entered into with governmental entities. If not, explain.

18. Refer to the Lovekamp Testimony, page 9, lines 13–19, page 10, lines 4–9, and Exhibits REL-1 and REL-2.

a. Confirm that the weighted average daily costs for a single charger unit and a dual charger unit are derived by dividing the daily cost of a dual charger unit by two, adding the result to the daily cost of a single charger unit, and dividing the sum by two. If this cannot be confirmed, explain how it was derived.

b. If the premise in part a. of this request can be confirmed, provide the reasoning and justification for the use of this approach.

19. Refer to the Lovekamp Testimony, page 9, lines 19–23. Explain how the Companies developed the assumption that the charging stations would be used for four hours per day and will consume 4 kWh each hour.

20. Refer to the Lovekamp Testimony, page 12, lines 4–8, which discuss the annual update to the EVC tariff proposed by the Companies. State whether the Companies envision the proposed annual filing to be a tariff filing, an application filing, or a post-case filing under the docket number of this proceeding.

21. Refer to the Lovekamp Testimony, Exhibit REL-1, pages 1 and 3 of 6. Provide the supporting calculation(s) for the \$.03 shown on page 1 for the environmental surcharge and explain how the table at the bottom of page 3 supports that amount.

22. Provide an electronic copy of Exhibits REL-1 and REL-2 in Excel spreadsheet format with the formulas intact and unprotected.

23. Explain why an increase in demand revenue for EVSE-R customers was not taken into consideration in calculating the proposed rates for that tariff.

24. Provide a sample bill for each of the three proposed tariffs.

25. Refer to the Application, Exhibit 1, proposed EVSE tariff, the Terms and Conditions, paragraph 6, and to the Lovekamp Testimony, pages 4–5, which state that a 10-year average service life was determined for the charging stations.

a. Explain the choice of, and basis for, the use of a 20-year service period specified in paragraph 6.

b. Explain the choice of, and basis for, the use of 5-year period regarding replacement after removal specified in paragraph 6.

b. Since tariff EVSE requires customers to pay for charging station installations, explain whether and under what conditions the costs of reinstallations of removed stations would therefore be treated differently from the costs of initial installations.

c. State whether a customer would incur any costs for a charging station reinstallation if all the time-period conditions of EVSE, paragraph 6, were met and exceeded.



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DATED **DEC 09 2015** _____

cc: Parties of Record

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