

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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 THIRD 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 copy of the following information. The information requested herein is due within seven days of the date 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 application, Exhibit 1, the proposed Electric Vehicle Charging ("EVC") tariff for each of the Companies, Terms and Conditions, paragraph 2. This paragraph states, "EV Customer is required to pay by means of credit card or Charging Station Supplier Account."

a. State whether the Charging Station Supplier refers to ChargePoint. If not, identify the Charging Station Supplier.

b. Explain what is meant by "Charging Station Supplier Account" and how such an account is obtained.

c. Explain whether the money paid at an EVC charging station, either with a credit card or Charging Station Supplier account, is paid wholly and directly to the Companies or only in part and/or through a third party.

2. Refer to the application, the Direct Testimony of Rick E. Lovekamp, page 6, lines 21-23, which state that, for the Electric Vehicle Supply Equipment ("EVSE") tariff, the Companies plan to use an assumed usage of 5,852 kWh annually. Given that the usage data from the electric vehicle charging stations ("charging stations") will be obtainable from the Charging Station Supplier to the Companies, explain why the EVSE tariff should not be updated annually to reflect actual usage from the previous year.

3. Refer to the Companies' response to Commission Staff's Second Request for Information ("Staff's Second Request"), Item 5. The response refers to a charging station that the Companies maintain at the Auburndale Service Center. Provide the following information related to this charging station:

- a. Type of charging station,
- b. Users of the charging station, i.e., whether the charging station is open to the public or is available only for the Companies' personnel,
- c. Capital costs and annual operation and maintenance expenses of the charging station, and
- d. The cost to charging station users, if any.

4. Refer to the Companies' response to Staff's Second Request, Item 7. The response states that the proposed charging stations would permit drivers to know of a station's availability.

a. State the methods by which drivers would be able to access this information.

b. State whether this ability would apply only to the EVC Tariff customers or if it would also apply to customers using charging stations installed under the EVSE and Electric Vehicle Supply Equipment – Rider ("EVSE-R") Tariffs.

5. Refer to the Companies' response to Staff's Second Request, Item 16. Provide the kW demand increase that could be experienced by an EVSE-R Tariff customer if the customer:

a. Has a single charging station.

b. Has a dual charging station.

6. State whether the Companies have made any decisions as to the location of any EVC charging stations. If so, provide the locations. If not, provide the Companies' strategy regarding the placement of the charging stations.

7. Given that the fees proposed in the EVC tariff are calculated to recover all costs incurred to install, operate, and maintain the charging stations, explain whether the revenues, expenses, and costs associated with this tariff should be removed from the revenue requirement determination in the Companies' next base rate cases.

8. State whether the charging stations selected by the Companies are capable of time-of-use pricing. If so, explain why the Companies are not proposing such pricing in this proceeding and whether they plan to do so in the future. If not, state

whether the Companies had the option of choosing charging stations capable of time-of-use pricing.



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DATED **FEB 25 2016**

cc: Parties of Record

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