

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>APPLICATION OF KENTUCKY UTILITIES</b>	)	
<b>COMPANY FOR AN ADJUSTMENT OF ITS</b>	)	<b>CASE NO. 2014-00371</b>
<b>ELECTRIC RATES</b>	)	

**DATA REQUESTS OF**  
**KENTUCKY UTILITIES COMPANY**  
**PROPOUNDED TO COMMUNITY ACTION COUNCIL FOR**  
**LEXINGTON-FAYETTE, BOURBON, HARRISON AND NICHOLAS COUNTIES, INC.**

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (“CAC”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 12, 2014.

**Instructions**

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, CAC, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if CAC receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If CAC objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of CAC, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

## Data Requests

### Mr. Ratchford

1. What is the average monthly electric consumption of CAC's clients who are KU customers?
2. Mr. Ratchford states, "And because the proposed basic service charge increase is so great, there is far less incentive for customers to conserve energy."<sup>1</sup>
  - a. Does CAC acknowledge that KU's proposed Rate RS energy rate, \$0.08057 per kWh, is higher than KU's current Rate RS energy rate, \$0.07744 per kWh?
  - b. Does CAC therefore acknowledge that KU's proposed Rate RS energy rate will provide residential electric customers a greater, not a lesser, incentive to conserve energy than does KU's current Rate RS energy rate?
  - c. Does CAC acknowledge that an energy-saving measure or approach that reduced a residential customer's electric usage by an average of 250 kWh per month would represent an energy savings of over 20% per month for an average KU residential customer? Does CAC agree such an energy savings would be significant?
  - d. Does CAC acknowledge that an energy-saving measure or approach that reduced a residential customer's electric usage by an average of 250 kWh per month would produce bill savings under KU's current Rate RS energy rate of \$19.36 per month, and that the same measure or approach would produce bill savings under KU's proposed Rate RS energy rate of \$20.14 per month?
  - e. Does CAC acknowledge that KU's proposed Rate RS energy rate would have to increase by \$0.00604 per kWh if KU's Rate RS basic service charge remained at its current level of \$10.75 per month?<sup>2</sup> Does CAC further acknowledge that \$0.00604 per kWh times 250 kWh equals \$1.51?
  - f. Is CAC aware of any of its clients that would implement an energy-saving measure or practice to save \$21.65 per month but would not implement the same energy-saving measure or practice to save \$20.14 per month?

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<sup>1</sup> Ratchford at 17.

<sup>2</sup>  $(\$18.00 \text{ per month} - \$10.75 \text{ per month}) / 1,200 \text{ kWh per month average residential consumption} = \$0.00604 \text{ per kWh}$

Dated: March 23, 2015

Respectfully submitted,



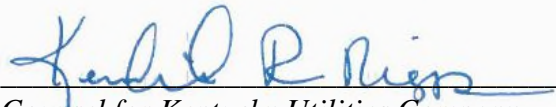
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*Counsel for Kentucky Utilities Company*

**CERTIFICATE OF COMPLIANCE**

This is to certify that Kentucky Utilities Company's March 23, 2015 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 23, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Data Requests is being mailed, by first class United States mail, postage prepaid, to the Commission on March 23, 2015.



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*Kenneth R. Rigs*  
*Counsel for Kentucky Utilities Company*