

written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to the Direct Testimony of Charles D. Buechel (“Buechel Testimony”), page 4. Starting at line 14, Mr. Buechel states that, “it has come to KSBA’s attention that some schools that qualify for the AES tariff were mistakenly provided service under different tariffs.”

a. Is it Mr. Buechel’s testimony that qualifying schools not currently taking service under the AES tariff were not made aware of the tariff when initiating service with KU? If yes, provide any available support for that position and the date that each such school initiated service with KU.

b. Provide details of instances where the appropriate tariff has not been utilized for school boards’ facilities.

2. Refer to page 5 of the Buechel Testimony. Starting at line 5, Mr. Buechel states that “[b]y restricting the availability of the AES tariff to customers receiving service on this rate as of February 6, 2009, KU will discourage new schools from installing energy efficient heating and cooling systems such as geothermal.” Explain how limiting new schools to a rate other than the AES rate would discourage them from installing energy efficient systems.

3. Refer to pages 7 and 9 of the Buechel Testimony where he states that the Commission has historically used a gradual approach to implement rate increases and recommends that it do so in this case. However, specific recommendations are not provided. If Mr. Buechel has specific recommendations, provide them.



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