

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION OF THE RELIABILITY	)	
MEASURES OF KENTUCKY'S	)	ADMINISTRATIVE
JURISDICTIONAL ELECTRIC	)	CASE NO. 2011-00450
DISTRIBUTION UTILITIES	)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
ON REHEARING TO KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY

Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") (collectively, the "Companies"), pursuant to 807 KAR 5:001, are to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than September 6, 2013. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the 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, they 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.

1. Refer to the Rehearing Testimony of Paul Gregory Thomas ("Thomas Testimony"). On page 2, at lines 3-6, Mr. Thomas provides his belief that the Commission's order in this matter dated May 30, 2013, ("May 30 Order") requires that for each circuit whose System Average Interruption Duration Index ("SAIDI") or System Average Interruption Frequency Index ("SAIFI") value in a given year is higher than the rolling five-year average for that circuit, each utility to file "an extensive list of information ... including a Corrective Action Plan for the circuit and any other information to help the Commission understand the circuit's performance."<sup>1</sup> For purposes of clarification, it should be noted that the Commission's Order states that the utility shall provide, for each of the identified circuits, "a Corrective Action Plan which describes any measures the utility has completed or plans to complete to improve the circuit's performance."<sup>2</sup> Do the Companies feel there is a difference between their belief that the Commission's intent is to "require" corrective action plans for each circuit falling outside of the rolling

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<sup>1</sup> Thomas Testimony, p. 2.

<sup>2</sup> "An Investigation of the Reliability Measures of Kentucky's Jurisdictional Electric Distribution Utilities," Final Order, p. 9 (Ky. PSC May 30, 2013)

five-year average and the Commission's stated requirement that the utilities report and describe "any measures the utility has completed or plans to complete?"

2. Refer to the Thomas Testimony, page 2, at lines 12-14. Mr. Thomas states the belief that the reporting requirements ordered by the Commission would "create increased administrative burdens for utilities and potentially increased costs for customers without providing the Commission information on circuits that might need improvement."

a. Explain the "increased administrative burden(s)" that the Companies feel the Commission's Order adds to the utilities.

b. Provide a breakdown of potential increased costs associated with the reporting requirements ordered by the Commission, along with a description of how those costs would impact customers.

c. With the understanding that the Commission's Order does not require corrective actions to be taken for any specific circuit, explain the additional costs the Companies will incur by reporting the corrective actions taken for those circuits identified by the Companies as requiring such action.

3. On page 2, at lines 18-19, of the Thomas Testimony, Mr. Thomas indicates that "the Companies annually review circuit-level data for all of their circuits and develop and execute improvement plans for circuits identified as needing improvement." Aside from reporting the information related to those specific circuits whose SAIDI or SAIFI values fall outside the rolling five-year averages, provide an explanation as to how the reporting requirements ordered by the Commission differ from the data and analysis that the Companies already appear to be compiling.

4. On page 3 of the Thomas Testimony, Mr. Thomas describes the annual process utilized by the Companies for analyzing and providing improvement plans for individual distribution circuits. At lines 18-21, Mr. Thomas states that as part of the process, the Companies' personnel "physically examine the circuit in a field evaluation to verify and modify the results of their root-cause analysis and to develop a specific improvement plan for the circuit."

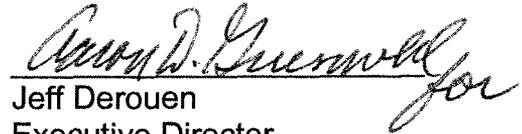
a. Provide details as to the types of information gained from the field visits performed that aid the Companies' personnel in verifying and modifying its analysis.

b. Describe how the field visits assist the Companies' personnel in developing specific improvement plans for individual circuits.

c. Explain why the analysis described by the Companies to identify the need for improvement plans for an individual circuit would not be informative if reported as part of that individual circuit's annual reliability assessment report.

5. On page 4 of the Thomas Testimony, at lines 4-7, the Companies' proposal for an alternative reporting requirement is given. Specifically, the Companies propose that the Commission "keep all of circuit-level reporting requirements from the May 30 Order, modifying only the Corrective Action Plan component to require plans only for each circuit whose one-year SAIDI or SAIFI exceeds its own rolling five-year average by two standard deviations." Identify what portion of the Commission's order specifically prohibits a utility from providing corrective action plans only for those circuits whose SAIDI or SAIFI falls outside of the five-year average by two standard deviations as proposed.

6. On page 4 of the Thomas Testimony, the Companies propose moving the deadline for submitting the reports as ordered by the Commission from April 1 of each year to July 1 of each year. Mr. Thomas explains that this proposal is due to the fact that the Companies' current distribution reliability analysis and improvement process is a year-round endeavor. In the Direct Testimony of Everett G. Phillips filed by Kentucky Power Company ("Kentucky Power") in this case on August 7, 2013, Mr. Phillips states that Kentucky Power proposes moving the deadline annually to May 1. With the understanding that the Commission Staff will need adequate time to review and analyze data provided by each utility, would the Companies concerns over the deadline be adequately addressed by moving the deadline for reports to be submitted annually to the Commission to May 1 of each year, or is the July 1 date preferred? Explain.



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