

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

In the matter of: : CASE NO. 2012-00221
APPLICATION OF KENTUCKY UTILITIES :
COMPANY FOR AN ADJUSTMENT OF :
ITS ELECTRIC RATES :

**KENTUCKY SCHOOL BOARDS ASSOCIATION'S SUPPLEMENTAL
DATA REQUESTS**

Comes now the intervenor, Kentucky School Boards Association ("KSBA"), and hereby propounds the following requests for information upon Kentucky Utilities Company ("KU") to be answered by those officers, employees or agents of KU as may be cognizant of the requested information and who are authorized to answer on behalf of KU. These requests are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. KSBA reserves the right to propound additional requests for information as and if additional information is required.

Additional Instructions

- A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.
- B. Restate the information inquiry immediately preceding each response.

C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KSBA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means Kentucky Utility Company or the witness, as the context requires.

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which Kentucky Utility Company or its

officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.

3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

9. The term "warranty company" means any company, individual, entity or other organization that engages in the business of providing or arranging for services on utility lines, including but not limited to gas, electric, water or sewer in a consumers home, apartment or other place of abode.

CERTIFICATE OF SERVICE AND FILING

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that KSBA's August 28, 2012 electronic filing has been transmitted to the Commission on August 28, 2012; that there are current no parties exempt from participation by electronic means in this proceeding; that an original and one copy of the filing is being mailed to the Commission on August 28, 2012; and that on August 28, 2012 electronic mail notification of the filing will be provided to the following:

Hon. David C. Brown
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, Kentucky 40202

Hon. Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202

Hon. Dennis G. Howard, II
Hon. Lawrence W. Cook
Assistant Attorney General
Office of the Attorney General
Utility and Rate Intervention Division
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204

Hon. Robert M. Watt, III
Stoll Keenon Ogden, PLLC
300 W. Vine Street
Suite 2100
Lexington, KY 40507-1801

Hon. Kendrick Riggs
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202-2828

Hon. Allyson K. Sturgeon
Senior Corporate Attorney
LG&E Energy Corp.
220 W. Main Street
Louisville, KY 40202

Lonnie E. Bellar
Vice President – State Regulation
Kentucky Utilities Company
220 West Main Street
PO Box 32010
Louisville, Kentucky 40202

Iris Skidmore, Esq.
Bates & Skidmore
415 West Main Street
Frankfort, Kentucky 40601
Counsel for Community Action Counsel

David J. Barberie, Esq.
Department of Law
Lexington-Fayette Urban
County Government
200 East Main Street
Lexington, Kentucky 40588



ATTORNEY FOR KSBA

**KSBA's Supplemental Data Requests to
Kentucky Utilities Company
Case No. 2012-00221**

**KSBA'S SUPPLEMENTAL REQUESTS TO KENTUCKY UTILITIES
COMPANY**

1. In Mr. Conroy's response to KSBA'S initial data request No. 3 he states approximately one-third of KU's Rate AES customers have average maximum loads exceeding 50 kw. Please provide a list of all Rate AES customer accounts that exceed 50 kw including account name and average kw.
2. Please provide the number of the 295 Rate AES school accounts identified in Case No. 2009-00548 (Seelye Exhibit 20) with average maximum loads less than 50 kw.
3. Please explain how KU works to create different rate schedules that accurately reflect the costs to serve groups of customers with similar service characteristic if KU, as stated, has not performed such studies comparing the usage characteristics of various types of customers.
4. Please confirm that KU was not aware of the significant bill increase for school athletic fields when it discontinued Rate GS primary and migrated those accounts to Rate PS.
5. Please provide both the installed cost and the embedded revenue requirement in the companies TODS and TODP rate schedules for the time-based metering referenced in Conroy Response to KSBA initial data request No. 5.