

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN)	CASE NO. 2012-00221
ADJUSTMENT OF ITS)	
ELECTRIC RATES)	

RESPONSE OF THE KENTUCKY SCHOOL BOARDS ASSOCIATION TO THE

FIRST DATA REQUEST OF KENTUCKY UTILITIES COMPANY

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

**Response of the Kentucky School Boards Association to the
First Data Request of Kentucky Utilities Company**

Responding Witness: Ronald L. Willhite

Q1. Provide the detailed analysis prepared by Mr. Willhite to derive the 40 percent ratchet proposed on page 8 of his direct testimony.

A1. No detailed analysis was prepared.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

**Response of the Kentucky School Boards Association to the
First Data Request of Kentucky Utilities Company**

Responding Witness: Ronald L. Willhite

Q2. Provide a detailed list of the specific costs that are included in the 40 percent ratchet proposed on page 8 of Mr. Willhite's testimony.

A2. Mr. Willhite did not prepare a specific cost list. As stated in his testimony Mr. Willhite's recommendation was to adjust the existing demand ratchet percentages, for which KU did not provide any cost support, to address the conflicting result of demand and conservation efforts and the imposition of minimum charges.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response of the Kentucky School Boards Association to the

First Data Request of Kentucky Utilities Company

Responding Witness: Ronald L. Willhite

Q3. Indicate whether Mr. Willhite has ever submitted testimony concerning ratchet percentages. If so, provide the case number in which the testimony was submitted.

A3. Mr. Willhite does not recall previously submitting such testimony.

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

**Response of the Kentucky School Boards Association to the
First Data Request of Kentucky Utilities Company**

Responding Witness: Ronald L. Willhite

Q4. Please provide all work-papers, source documents, and electronic spreadsheets utilized in the development of Mr. Willhite's Direct Testimony. Please provide all spreadsheets in Microsoft Excel with formulas intact.

A4. See attached. Mr. Willhite relied on documents in the current and past KU rate proceedings found on the Commission's website; statutes and regulations pertaining to public schools found on the KY.GOV and the Kentucky Department of Education websites; and his energy and school experience. Likewise, KU previously provided an excel file it uses to monitor the \$500,000 cap which lists the accounts and savings involving switching to Rate AES following Case No. 2009-00548.

VERIFICATION

COMMONWEALTH OF KENTUCKY)

COUNTY OF JEFFERSON)

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared, Ronald L. Willhite, who, being by me first duly sworn deposed and said that:

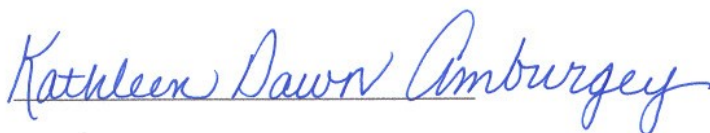
He is appearing as a witness on the behalf of the Kentucky School Boards Association before the Kentucky Public Service Commission in an Application filed by Kentucky Utilities Company, and that he has personal knowledge of the matters set forth in responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Ronald L. Willhite

SWORN TO AND SUBSCRIBED BEFORE ME this

23 day of October, 2012



NOTARY PUBLIC

My Commission Expires: 8.4.16