COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF KENTUCKY UTILITIES COMPANY TO THE SUPPLEMENTAL DATA REQUESTS OF KENTUCKY SCHOOL BOARD ASSOCIATION DATED AUGUST 28, 2012

FILED: SEPTEMBER 12, 2012

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Director - Rates for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the 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.

Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 10th day of September 2012.

Notary Public (SEAL)

My Commission Expires:

July 21, 2015

KENTUCKY UTILITIES COMPANY

CASE NO. 2012-00221

Response to Supplemental Data Requests of
Kentucky School Board Association
Dated August 28, 2012

Question No. 1

Responding Witness: Robert M. Conroy

Q-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.

A-1. See attached. Certain information requested is confidential and proprietary, and is being provided under seal pursuant to a petition for confidential treatment.

CONFIDENTIAL INFORMATION REDACTED

Current CA	Avg KW	Name Info
[redacted]	50.8	[redacted]
	51.5	
	51.8	
	52.6	
	53.8	
	53.9	
	54.1	
	55.4	
	55.6	
	55.8	
	56.3	
	56.7	
	57.3	
	57.7	
	58.1	
	58.4	
	58.9	
	59.3	
	60.9	
	60.9	
	61.2	
	62.6	
	63.1	
	63.5	
	64.2	
	64.8	
	66.0	
	66.3	
	66.8	
	67.2	
	67.6	
	68.0	
	68.2	
	73.9	
	74.1	
	74.4	
	74.9	
	76.1	
	77.0	
	77.1	
	78.1	
	79.8	
	80.8	
	81.1	
	81.8	

CONFIDENTIAL INFORMATION REDACTED

Current CA	Avg KW	Name Info
[redacted]	83.1	[redacted]
	83.2	
	83.5	
	84.4	
	85.0	
	85.6	
	86.0	
	87.6	
	88.0	
	88.4	
	90.4	
	91.0	
	92.4	
	92.4	
	94.3	
	94.7	
	97.0	
	101.7	
	104.0	
	107.1	
	110.2	
	113.2	
	118.1	
	118.9	
	120.0	
	120.3	
	122.1	
	125.1	
	126.3	
	127.2	
	135.5	
	135.9	
	140.3	
	141.6	
	142.5	
	145.6	
	147.2	
	148.8	
	151.2	
	152.3	
	156.4	
	157.0	
	157.9	
	159.5	

CONFIDENTIAL INFORMATION REDACTED

Current CA	Avg KW	Name Info
[redacted]	160.0	[redacted]
	161.9	
	164.4	
	165.6	
	168.6	
	170.3	
	170.4	
	172.0	
	177.1	
	178.3	
	180.9	
	184.9	
	186.2	
	187.7	
	192.8	
	193.3	
	195.5	
	200.6	
	204.8	
	205.3	
	211.0	
	215.4	
	217.7	
	219.3	
	220.3	
	223.0	
	224.6	
	224.8	
	228.1	
	233.6	
	234.7	
	236.0	
	236.5	
	236.9	
	238.1	
	239.6	
	240.4	
	245.3	
	249.1	
	253.9	
	256.4	
	268.4	
	269.4	
	269.7	

CONFIDENTIAL INFORMATION REDACTED

Current CA	Avg KW	Name Info
[redacted]	273.9	[redacted]
	274.8	
	277.3	
	279.8	
	282.0	
	283.2	
	283.4	
	283.9	
	285.1	
	285.8	
	286.9	
	288.4	
	289.7	
	294.3	
	297.0	
	300.7	
	303.7	
	303.9	
	307.7	
	310.2	
	313.0	
	315.7	
	315.9	
	316.1	
	317.5	
	317.8	
	319.6	
	320.5	
	322.5	
	322.7	
	323.4	
	323.6	
	325.3	
	326.3	
	330.8	
	333.8	
	333.8	
	336.3	
	337.5	
	339.0	
	348.1	
	350.3	
	357.5	
	359.2	

CONFIDENTIAL INFORMATION REDACTED

Current CA	Avg KW	Name Info
[redacted]	368.0	[redacted]
	371.8	
	372.0	
	380.1	
	382.0	
	385.8	
	386.7	
	388.6	
	394.0	
	395.9	
	399.1	
	412.3	
	413.7	
	420.7	
	421.3	
	422.1	
	422.4	
	431.5	
	435.5	
	436.2	
	442.3	
	442.6	
	444.3	
	444.9	
	449.1	
	457.0	
	462.0	
	467.1	
	483.7	
	485.1	
	493.5	
	501.7	
	507.1	
	516.1	
	580.0	
	594.1	
	663.9	
	712.2	
	723.2	
	801.7	
	1299.1	

KENTUCKY UTILITIES COMPANY

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Question No. 2

Responding Witness: Robert M. Conroy

Q-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.

A-2. The 295 customers identified by Mr. Seelye in Case No. 2009-00548 are average customers; the total number of bills for the year divided by 12. The number of year end customers whose demand was less than 50 kW is 153.

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Question No. 3

Responding Witness: Robert M. Conroy

Q-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.

A-3. KU has sound data on the cost to serve its customers, which forms the rates KU proposes. Among KU's data are customers' demand and usage patterns and the facilities required to serve such demands. This data allows KU to group customers based on similar service characteristics, and to craft rates that recover the costs to serve such similar customers.

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Question No. 4

Responding Witness: Robert M. Conroy

Q-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.

A-4. GS Primary service was discontinued in Case No. 2003-00434, effective July 1, 2004. Those customers were migrated to LP-Primary.

PS Primary was introduced in Case No. 2008-00251, effective February 6, 2009. The LP-Primary customers who did not meet the parameters for PS Primary, a maximum of 250 kW, were "grandfathered" on PS Primary or, at their option could migrate to TOD Primary.

KU was not specifically aware of the bill impact of discontinuing the GS Primary rate on school athletic fields per se. School athletic fields are not a separate customer class, but rather are grouped with other customers with similar service characteristics. KU is aware of the average impact on a rate class as a whole when rate structures are modified. When rate structures are modified for a given class of customers, the impact on individual customers may be greater than or lower than the average depending upon the individual customer's usage characteristics.

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Question No. 5

Responding Witness: Robert M. Conroy

Q-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.

A-5. The installed costs associated with time-based metering for a Time-of-Day Secondary customer is an average of $352. Similarly, for a Time-of-Day Primary customer the average installed cost would be $519.

The requested embedded revenue requirement analysis is not readily available and requires substantial original work to complete. However, there is sufficient information in the Company's cost of service study and other documents submitted in this proceeding for the KSBA to perform its own revenue requirement analysis for these facilities.