

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

**In the Matter of:**

**APPLICATION OF KENTUCKY )  
UTILITIES COMPANY FOR AN ) Case No. 2014-00371  
ADJUSTMENT OF ITS ELECTRIC RATES )**

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**ALICE HOWELL, CARL VOGEL, AND SIERRA CLUB’S SECOND SET  
OF DATA REQUESTS TO KENTUCKY UTILITIES COMPANY**

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Intervenors Alice Howell, Carl Vogel, and Sierra Club, pursuant to the Kentucky Public Service Commission’s (“Commission”) December 12, 2014 Order (“Scheduling Order”), propound the following requests for information on Kentucky Utilities Company in the above captioned proceeding.

The Company shall answer these requests for information in the manner set forth in the Scheduling Order and by no later than the February 20, 2015 deadline set forth in the Appendix to that order. Please produce the requested documents in electronic format to:

Casey Roberts  
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Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Intervenor, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).

In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

We reserve the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

### **DEFINITIONS**

Unless otherwise specified in each individual interrogatory or request, “you,” “your,” the “Company,” or “KU,” refers to Kentucky Utilities Company, and its affiliates, employees, and authorized agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all or each and every example of the requested information.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and

copies either (1) in the possession, custody or control of the Company regardless of where located, or (2) produced or generated by, known to or seen by the Company, but now in their possession, custody or control, regardless of where located whether or still in existence.

Such “documents” shall include, but are not limited to, applications, permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made.

Without limitation, the term “control” as used in the preceding paragraphs means that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original

“DSM” means demand-side management programs including demand-response, interruptible load, and energy efficiency programs.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to Kentucky Utilities Company;

- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

“Relating to” or “concerning” means and includes pertaining to, referring to, or having as a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

“Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas intact.

### **PRIVILEGE**

If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any interrogatory or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit the Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, produce a “privilege log” that identifies the author, recipient, date and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable the Intervenors or the Commission to evaluate the validity of such claims.

### **TIME**

Unless otherwise provided, the applicable time period for each of these requests for information is January 1, 2010 to the present.

### **DATA REQUESTS**

1. Reference Attachment to Response to Sierra Club 1-5(b), pp. 1-2. In an October 29, 2014 e-mail, Jeff Wernert of the Prime Group poses the following question to Mr. Conroy: “For rate design, how many classes would you like to propose going to cost-based customer charges?”

- a) Please describe in detail the Company's response to Mr. Wernert's question. Specifically, for each rate class other than the residential class, please explain whether the Company is proposing to increase the customer charge to cost-based levels and describe the rationale for its decision regarding whether to increase the customer charge.
  - b) Please provide copies of all e-mail communications, text messages, internal memoranda, reports, or other documentation of the Company's consideration of Mr. Wernert's question and decisions regarding whether to increase customer charges for the non-residential rate classes.
  - c) Please provide copies of all presentations to Company management or the Company's Board of Directors regarding consideration of Mr. Wernert's question and decisions regarding whether to increase customer charges for the non-residential rate classes.
2. Reference Response to Sierra Club 1-9(a).
- a) Please describe the "other energy solutions" that may be more cost-effective than "installing, operating and maintaining the minimum set of equipment necessary to provide service" to residential customers with low kWh usage. Please provide copies of all memoranda, presentations, reports, or other documents in the Company's possession regarding these "other energy solutions."
  - b) Is the Company aware of any low-usage residential customers who initiated service under the current customer charge rather than installing more cost-effective energy solutions? If so, please explain how the Company determined that it was uneconomic for these customers to initiate service.
3. Reference Attachment to Response to Sierra Club 1-10(d).
- a) For each rate period specified for avoided energy costs (e.g., Spring Weekend Off-Peak), please provide:
    - i) The calendar months included in each seasonal period.
    - ii) The clock hours included in each daily time period.

- iii) The kWh usage by an average residential customer during the rate period, either forecasted for the test year or for the most recent historical period for which such usage data exists.
  - b) Please provide the average annual load factor for the residential class, either forecasted for the test year or for the most recent 12-month period for which such data exists.
4. Reference Response to Sierra Club 1-18. For the 12-month period from January through December of 2013, please provide the following information:
- a) Number of residential customers.
  - b) Annual kWh sales to all residential customers.
  - c) Average monthly kWh consumption by all residential customers.
  - d) Number of residential customers who received assistance from a third-party agency in 2013.
  - e) Annual kWh sales to residential customers who received assistance from a third-party agency in 2013.
  - f) Average monthly kWh consumption by residential customers who received assistance from a third-party agency in 2013.
  - g) Number of residential customers whose average monthly consumption equals or falls below the average monthly consumption for all residential customers.
  - h) Number of residential customers whose average monthly consumption exceeds the average monthly consumption for all residential customers.
  - i) Average monthly consumption of all residential customers whose average monthly consumption equals or falls below the average monthly consumption for all residential customers.
  - j) Average monthly consumption of all residential customers whose average monthly consumption exceeds the average monthly consumption for all residential customers.
  - k) Number of residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption equals

or falls below the average monthly consumption for all residential customers.

- l) Number of residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption exceeds the average monthly consumption for all residential customers.
  - m) Average monthly consumption of those residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption equals or falls below the average monthly consumption for all residential customers.
  - n) Average monthly consumption of those residential customers who received assistance from a third-party agency in 2013 and whose average monthly consumption exceeds the average monthly consumption for all residential customers.
5. Reference Supplemental Response to Sierra Club 1-23. This response includes a series of email messages referencing attached files named as follows:
- “Customer Service Rate Case Pre-Planning Team - Proposed Tariff Revisions--DEH-04-07-14 - SEW-04-08-14 Response.docx”,
  - “Customer Service Rate Case Pre-Planning Team - Proposed Tariff Revisions--DEH-04-07-14.docx”,
  - “<http://home/projects/pprc/Shared%20Documents/Custom%20Service%20Rate%20Case%20Pre-Planning%20Team%20-%20Proposed%20Tariff%20Revisions.docx>”, and
  - “20Tariff%20Revisions.docx”.

Significant portions of these attachments were redacted as nonresponsive to DR 1-23(c), which asked only about the CSR tariff. Please provide copies of these attachments with portions relating to the standard residential service and residential time-of-day tariffs unredacted.

6. If the basic electric service charge for the residential class remained at \$10.75, and the Company is granted the full amount of its requested revenue increase, what would the volumetric energy rate be?

Respectfully submitted,



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JOE F. CHILDERS

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Dated: February 6, 2015



**CERTIFICATE OF SERVICE**

I hereby certify, this the 6th day of February, 2015, that the attached Alice Howell, Carl Vogel, and Sierra Club's Second Set of Data Requests to Kentucky Utilities Company is a true and correct copy of the document being filed in paper medium; that the electronic filing has been transmitted to the Commission on February 6, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; that an original and one copy of this document is being mailed to the Commission for filing on February 6, 2015; and that an electronic notification of the electronic filing will be provided to all counsel listed on the Commission's service list in this proceeding.



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Joe F. Childers