COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY
PROPOUNDED TO KENTUCKY SCHOOL BOARDS ASSOCIATION

Kentucky Utilities Company ("KU") respectfully submits the following data requests to Kentucky School Boards Association ("KSBA"), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission ("Commission") in this matter on December 12, 2014.

Instructions

1. As used herein, "Documents" include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, KSBA, its witnesses, or its counsel.

2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if KSBA receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If KSBA objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of KSBA, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

Mr. Willhite

1. Regarding the two-year School Energy Management Program approved by the Commission in Case No. 2013-00067, please admit that the KSBA has not spent all the funds provided by the soon-to-expire program.

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

3. On page 10, lines 8-10 of his Testimony, Mr. Willhite states that some schools will experience base rate increases 75 percent greater than other customers on Rate PS and rate TODS.

   a. Provide any analysis that Mr. Willhite has performed to support this statement.

   b. Provide a copy of the calculations of the impact for all schools for which Mr. Willhite has calculated an impact.

   c. If the calculations or analysis is in electronic form, please provide an electronic version of the calculations and analysis.

4. On page 3, lines 27-30 of his Testimony, Mr. Willhite states that collecting the increased to rates PS-secondary and TODS through increased demand charges "is contradictory to sound cost of service principals."

   a. Provide any analysis that Mr. Willhite has conducted to support this statement.

   b. Identify which cost-of-service principles are being violated.

5. From page 10 lines 43 through page 11 line 8 of his Testimony, Mr. Willhite states that Rates PS and TODS subject schools to an unreasonable disadvantage.

   a. With regard to this statement, provide any analysis regarding the financial disadvantage to schools resulting from the different load shapes that Mr. Willhite has included in his testimony.

   b. Identify the level at which a difference becomes an "unreasonable disadvantage."

   c. By reference to RLW Exhibits 2 and 3, Mr. Willhite states that the load shape for schools in July and August are different than other customers served under Rates PS and TODS. Provide any analysis that Mr. Willhite

has conducted for load shapes for customers served under these rates in any other month.

d. Has Mr. Willhite calculated the load factor for school loads relative to non-school loads? If yes, please provide those calculations. If no, provide the data in electronic form on which RLW Exhibits 2 and 3 are based.

6. On page 11, lines 13-15 of his Testimony, Mr. Willhite states that demand charges for schools should be set at no greater than 75% of the PS and TODS demand charges. Provide any analysis that Mr. Willhite has conducted to support this statement, particularly the 75% threshold.

7. Regarding Mr. Willhite's statement on page 12, lines 13-14 that Rate AES can be designed not to harm other customers, explain in detail how Mr. Willhite's recommendations would not result in increased costs being allocated to other customers.

8. On page 13, lines 20-23 of his Testimony, Mr. Willhite states that sports field lighting is an off-peak load.

a. Provide any analysis that supports this statement.

b. Has Mr. Willhite calculated the load factor for sports field lighting load? If yes, please provide those calculations.

9. The Commission approved Settlement in its Orders issued on December 20, 2012, in Case Nos. 2012-00221 and 2012-00222 that provided for LG&E and KU to propose a two-year demand-side management program to help fund energy management programs for schools affected by KRS 160.325. The annual levels of funding proposed in Case 2013-00067 were $500,000 for KU and $225,000 for LG&E.

a. State the total spending and anticipated spending for years 2013, 2014, and 2015 related to these requested amounts, and please explain any differences between the amounts requested and the amounts spent or anticipated to be spent.

b. If these amounts do not cover the total expense for the Kentucky School Energy Manager's Program in these years, explain the amount and source of any additional funding.

c. Given that KSBA's original request in Case Nos. 2012-00221 and 2012-00222 was to fund the program for two years, explain the reasons additional funding is being sought though this case.

d. When do you anticipate the Kentucky School Energy Managers Program will become self-funded and no longer need DSM subsidy?

10. Were you aware of LG&E and KU's 2014 DSM-EE Plan case, Case No. 2014-00003?

    a. Are you aware that your meeting with LG&E and KU on October 14, 2014, occurred during the proceedings of Case No. 2014-00003?

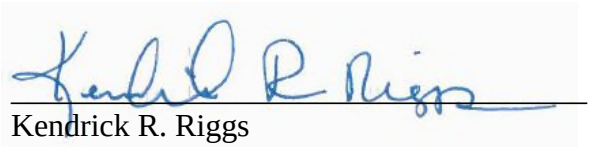
    b. Were you aware that the Companies were seeking approval for DSM-EE programs through 2018 in that proceeding?

    c. Are you a member of the Companies' DSM Advisory Group?

    d. Please explain why KSBA did not seek to intervene in Case No. 2014-00003 to raise the issue of future funding for the Kentucky School Energy Managers Program.

Dated: March 23, 2015

Respectfully submitted,



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Counsel for Kentucky Utilities Company

CERTIFICATE OF COMPLIANCE

This is to certify that Kentucky Utilities Company's March 23, 2015 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 23, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Data Requests is being mailed, by first class United States mail, postage prepaid, to the Commission on March 23, 2015.

Counsel for Kentucky Utilities Company