

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.'S
RESPONSE TO COMMISSION STAFF'S
FIRST SET OF DATA REQUESTS

11. Refer to the Direct Testimony of Mary Jean Riley, page 5. a. The Testimony states, "One of the most sensitive pieces of electrical equipment is the static var compensator (SVC) unit which NAS was required by (sic) to install." State who required North American Stainless ("NAS") to install the SVC. b. Explain how the penalty measurement change from kW to KVA resulted in a greater risk of NAS incurring compliance penalties. c. State the number of times that NAS had to power the SVC up and down because of a curtailment request by KU in calendar years 2012, 2013, and 2014.

SUPPLEMENTAL RESPONSE:

- a. This requirement is written in the Rates, Terms and Conditions for Furnishing Electric Service, Sheet 30.2, Protection of Service.
- b. The SVC is tuned in such a way that when the EAF's are idle there is kVAR present. The reason for this tuning is to run our shunt reactors at lower current keeping them cooler. This was done after several failures of reactors here at NAS. This requires NAS to shut down the SVC for a Physical Curtailment to bring the kVAR to below the Base Load of 4000 kVAR.
- c. 2012, 1
2013, 0
2014, 4