COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In	tho	Ma	tter	of.
	1116	VIA	Her	

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

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
SUPPLEMENTAL REQUEST FOR INFORMATION OF
KENTUCKY SCHOOL BOARDS ASSOCIATION (KSBA)
DATED FEBRUARY 6, 2015

FILED: FEBRUARY 20, 2015

COMMONWEALTH OF KENTUCKY)	
)	SS:
COUNTY OF JEFFERSON)	

The undersigned, Robert M. Conroy, being duly sworn, deposes and says that he is Director - Rates for Louisville Gas and Electric Company and Kentucky Utilities Company, an employee of 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

Votary Public (SEAL)

My Commission Expires:

JUDY SCHOOLER Notary Public, State at Large, KY My commission expires July 11, 2018 Notary ID # 512743

COMMONWEALTH OF KENTUCKY)	
)	SS:
COUNTY OF JEFFERSON)	

The undersigned, **John P. Malloy**, being duly sworn, deposes and says that he is Vice President, Customer Services for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.

John P. Malloy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 13th day of 18th day of 2015.

Jely Shuolle (SEAL)

My Commission Expires:
JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary 10 # 512743

COMMONWEALTH OF KENTUCKY)	~~
)	SS
COUNTY OF JEFFERSON)	

The undersigned, **David S. Sinclair**, being duly sworn, deposes and says that he is Vice President, Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.

David S. Sinclair

Subscribed and sworn to before me, a Notary Public in and before said County and State, this Aday of Achillary 2015.

Notary Public (SEA)

My Commission Expires:

JUDY SCHUULEN

Notary Public, State at Large, KY My commission expires July 11, 2018

Notary ID # 512743

COMMONWEALTH OF KENTUCKY)	
)	SS:
COUNTY OF JEFFERSON)	

The undersigned, **Paul Gregory Thomas**, being duly sworn, deposes and says that he is Vice President, Electric Distribution, for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.

Paul Gregory Thomas

Subscribed and sworn to before me, a Notary Public in and before said County and State, this day of Achieve 2015.

Notary Public (SEAL

My Commission Expires:

JUDY SCHOOLER Notary Public, State at Large, KY My commission expires July 11, 2018 Notary ID # 512743

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 1

Responding Witness: David S. Sinclair

- Q-1. Please provide copies of all available peak day load profiles for rate schedules GS, AES, PS-sec and TODS recorded in the last five years in the same format as the Company's response to KSBA Question No. 2 (First Request for Information) and include the rate schedule for each account
- A-1. See the attachment being provided in Excel format for the rate schedule information, which contains customer specific information. The information is considered confidential and proprietary and is being provided under seal pursuant to a Petition for Confidential Protection.

Attachment in Excel

The attachment(s) provided in separate file(s) in Excel format.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 2

Responding Witness: David S. Sinclair

- Q-2. Please provide copies of all available peak day load profiles for any industrial accounts recorded in the last five years and include the rate schedule for each account.
- A-2. The Company does not have load profiles by industrial class. See the response to Question No. 1 for all profiles by rate schedule.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 3

Responding Witness: David S. Sinclair

- Q-3. Please provide copies of all available peak day load profiles for any commercial accounts recorded in the last five years and include the rate schedule for each account.
- A-3. The Company does not have load profiles by commercial class. See the response to Question No. 1 for all profiles by rate schedule.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 4

Responding Witness: Robert M. Conroy

- Q-4. With regard to the response to KSBA Question No. 2 (First Request for Information) please provide the rate schedule and description (i.e. elementary, middle, high school, office, garage, etc.) for each listed account.
- A-4. See the attachment for the rate schedule information, which contains customer specific information. The information is considered confidential and proprietary and is being provided under seal pursuant to a Petition for Confidential Protection KU's records do not identify the specific facility type; therefore the requested information is not available.

Contract Account	Rate Category	
	KUCIE572	Time-of-Day Secondary Service
	KUUM_404	RLS 404: OH MV Open Bottom 7000L Fixture
	KUUM_428	LS 428: OH HPS Open Bottom 9500L Fixture
	KUCIE572	Time-of-Day Secondary Service
	KUUM_404	RLS 404: OH MV Open Bottom 7000L Fixture
	KUUM_451	LS 451: OH MH Directional 32000L Fixture
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUCIE562	Power Service Secondary
	KUCIE572	Time-of-Day Secondary Service
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUUM_451	LS 451: OH MH Directional 32000L Fixture
	KUUM_452	LS 452: OH MH Directional 107800L Fix
	KUUM_459	RLS 459: OH MH Directional 107800L Fix/P
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_404	RLS 404: OH MV Open Bottom 7000L Fixture
	KUCIE572	Time-of-Day Secondary Service
	KUUM_428	LS 428: OH HPS Open Bottom 9500L Fixture
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUUM_489	LS 489: OH HPS Directional 50000L Fix

Contract Account	Rate Category	
	KUCIE572	Time-of-Day Secondary Service
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUUM_425	RLS 425: OH Inc Tear Drop 6000L Fix Only
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_450	LS 450: OH MH Directional 12000L Fixture
	KUUM_451	LS 451: OH MH Directional 32000L Fixture
	KUUM_828	Excess Facilities ODL
	KUCME113	General Service Three Phase
	KUCME223	All Electric School 3-Phase Secondary
	KUUM_000	Unmetered temp suspension
	KUCIE561	Power Service Primary
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE562	Power Service Secondary
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUCIE572	Time-of-Day Secondary Service
	KUCIE568	Power Service - Secondary Pf Adj
	KUCIE568	Power Service - Secondary Pf Adj
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUCIE572	Time-of-Day Secondary Service
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUUM_488	LS 488: OH HPS Directional 22000L Fix

Contract Account	Rate Category	
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_454	RLS 454: OH MH Directional 12000L Fix/Po
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCME227	All Electric School 3-ph Secondary TDS
	KUCIE572	Time-of-Day Secondary Service
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_495	LS 495: UG MH Contemporary 32000L Deco
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_451	LS 451: OH MH Directional 32000L Fixture
	KUUM_454	RLS 454: OH MH Directional 12000L Fix/Po
	KUCIE572	Time-of-Day Secondary Service
	KUUM_487	LS 487: OH HPS Directional 9500L Fixture
	KUCIE572	Time-of-Day Secondary Service
	KUUM_000	Unmetered temp suspension
	KUUM_450	LS 450: OH MH Directional 12000L Fixture
	KUUM_452	LS 452: OH MH Directional 107800L Fix
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUCME113	General Service Three Phase
	KUUM_451	LS 451: OH MH Directional 32000L Fixture
	KUUM_452	LS 452: OH MH Directional 107800L Fix
	KUUM_455	RLS 455: OH MH Directional 32000L Fix/Po
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUCIE572	Time-of-Day Secondary Service
	KUUM_428	LS 428: OH HPS Open Bottom 9500L Fixture
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_464	LS 464: OH HPS Cobra Head 22000L Fixture

Contract Account	Rate Category	
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_487	LS 487: OH HPS Directional 9500L Fixture
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE571	Time-of-Day Service - Primary
	KUCME220	All Electric School Single Ph Secondary
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUCIE572	Time-of-Day Secondary Service
	KUCME221	All Electric School Single Phase Primary
	KUCIE572	Time-of-Day Secondary Service
	KUUM_464	LS 464: OH HPS Cobra Head 22000L Fixture
	KUUM_489	LS 489: OH HPS Directional 50000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCME113	General Service Three Phase
	KUUM_470	RLS 470: UG MH Directional 107800L Deco
	KUUM_487	LS 487: OH HPS Directional 9500L Fixture
	KUUM_488	LS 488: OH HPS Directional 22000L Fix
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUCME220	All Electric School Single Ph Secondary
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE562	Power Service Secondary
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUUM_464	LS 464: OH HPS Cobra Head 22000L Fixture

Contract Account	Rate Category	
	KUUM_828	Excess Facilities ODL
	KUCIE572	Time-of-Day Secondary Service
	KUUM_451	LS 451: OH MH Directional 32000L Fixture
	KUUM_452	LS 452: OH MH Directional 107800L Fix
	KUCIE568	Power Service - Secondary Pf Adj
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCIE572	Time-of-Day Secondary Service
	KUCME227	All Electric School 3-ph Secondary TDS
	KUCIE572	Time-of-Day Secondary Service
	KUUM_451	LS 451: OH MH Directional 32000L Fixture
	KUUM_455	RLS 455: OH MH Directional 32000L Fix/Po
	KUCIE572	Time-of-Day Secondary Service
	KUUM_404	RLS 404: OH MV Open Bottom 7000L Fixture
	KUCIE572	Time-of-Day Secondary Service
	KUUM_451	LS 451: OH MH Directional 32000L Fixture
	KUUM_452	LS 452: OH MH Directional 107800L Fix
	KUUM_465	LS 465: OH HPS Cobra Head 50000L Fixture

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 5

Responding Witness: David S. Sinclair

- Q-5. Please provide in Excel format an hourly load profile for the Company's monthly peak as shown on the 2014 Form page 401 provided in response to KSBA Question No. 23 (First Request for Information).
- A-5. See the attachment being provided in Excel format.

Attachment in Excel

The attachment(s) provided in separate file(s) in Excel format.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 6

Responding Witness: David S. Sinclair

- Q-6. Please provide the combined LGE-KU monthly system peaks in the FERC Form 1 page 401 format and hourly profiles in Excel format for each peak day shown for the years 2004-2014.
- A-6. See the attachment being provided in Excel format.

Attachment in Excel

The attachment(s) provided in separate file(s) in Excel format.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 7

Responding Witness: Dr. Martin J. Blake

- Q-7. With reference to the response to KU and LGE PSC 2-60 KUElectCOSS tab "Billing Det" please provide all work papers including calculations, derivations and source data for each item listed in columns shown on the spreadsheet.
- A-7. The number of customers, kWh, and revenue comes from the reconciliation of revenue in Schedule M submitted with the responses to PSC 2-60. The demand information comes from ATT_KU_PSC_2-60_LKEForecastLoadData.xslx.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 8

Responding Witness: Robert M. Conroy / Counsel

- Q-8. Please provide the Company's current estimate of expected percentage revenues increases by rate class to be passed through the ECR, DSM and FAC mechanisms for the next five years.
- A-8. See the Company's Objection filed on February 16, 2015. For the purpose of establishing base rates in this proceeding, the effects of the mechanisms are removed from the determination of the revenue requirement in this proceeding. For the five year business plan, the Company does not calculate the ECR, DSM and FAC mechanism revenues by rate schedule in the detailed manner that occurs with the determination of the actual monthly billing factor. The business plan contains a projection of the revenue requirement for each of the mechanisms in total for the Company. The total revenue requirement by mechanism is allocated across the various rate schedules based on the relationship of the energy consumption by rate schedule and is not intended to be the detailed calculations of each mechanism when performed for the actual monthly filings. See the attachment for the mechanism revenues in total and the amount allocated to each rate schedule.

Kentucky Utilities (000's)	<u>Year 2015</u>	<u>Year 2016</u>	<u>Year 2017</u>	<u>Year 2018</u>	<u>Year 2019</u>	2015 to 2016	2016 to 2017	2017 to 2018	2018 to 2019
ECR Tracker Revenue	\$82,530	\$114,799	\$128,530	\$146,516	\$174,945	39%	12%	14%	19%
KU AES 220	\$34	\$48	\$53	\$60	\$72	40%	12%	13%	19%
KU GS 110	\$3,375	\$4,737	\$5,313	\$6,076	\$7,283	40%	12%	14%	20%
KU FLS 730	\$2,489	\$3,457	\$3,836	\$4,325	\$5,112	39%	11%	13%	18%
KU PSP 561	\$1,050	\$1,474	\$1,654	\$1,882	\$2,243	40%	12%	14%	19%
KU PSS 562	\$9,557	\$12,838	\$14,452	\$16,736	\$20,213	34%	13%	16%	21%
KU RS 010	\$26,817	\$37,220	\$41,442	\$47,031	\$56,060	39%	11%	13%	19%
KU RTS 550	\$7,099	\$9,930	\$11,128	\$12,635	\$14,974	40%	12%	14%	19%
KU TODP 571	\$5,610	\$7,845	\$8,773	\$9,957	\$11,840	40%	12%	13%	19%
KU TODS 572	\$7,011	\$9,966	\$11,338	\$13,079	\$15,746	42%	14%	15%	20%
KU TODP 563	\$13,394	\$18,744	\$20,972	\$23,811	\$28,326	40%	12%	14%	19%
KU GS 113	\$4,935	\$6,929	\$7,774	\$8,893	\$10,664	40%	12%	14%	20%
KU AES 224	\$631	\$881	\$985	\$1,118	\$1,332	40%	12%	13%	19%
KU Lights	\$530	\$729	\$809	\$913	\$1,079	38%	11%	13%	18%
DSM Revenues	\$26,549	\$22,886	\$24,309	\$26,565	\$18,118	-14%	6%	9%	-32%
KU AES 220	\$12	\$11	\$11	\$12	\$8	-14%	6%	9%	-32%
KU GS 110	\$1,239	\$1,078	\$1,147	\$1,257	\$859	-13%	6%	10%	-32%
KU PSP 561	\$387	\$338	\$360	\$392	\$266	-13%	6%	9%	-32%
KU PSS 562	\$3,525	\$2,944	\$3,147	\$3,487	\$2,397	-16%	7%	11%	-31%
KU RS 010	\$9,767	\$8,376	\$8,831	\$9,607	\$6,554	-14%	5%	9%	-32%
KU TODP 571	\$2,066	\$1,794	\$1,904	\$2,069	\$1,401	-13%	6%	9%	-32%
KU TODS 572	\$2,574	\$2,282	\$2,464	\$2,721	\$1,864	-11%	8%	10%	-31%
KU TODP 563	\$4,934	\$4,288	\$4,554	\$4,950	\$3,354	-13%	6%	9%	-32%
KU GS 113	\$1,812	\$1,577	\$1,679	\$1,840	\$1,258	-13%	6%	10%	-32%
KU AES 224	\$231	\$199	\$211	\$230	\$156	-14%	6%	9%	-32%
FAC Revenue	\$39,938	\$49,567	\$72,221	\$89,368	\$106,008	24%	46%	24%	19%
KU AES 220	\$17	\$20	\$30	\$37	\$44	22%	45%	24%	18%
KU GS 110	\$1,627	\$2,051	\$2,997	\$3,709	\$4,416	26%	46%	24%	19%
KU FLS 730	\$1,192	\$1,458	\$2,105	\$2,599	\$3,079	22%	44%	23%	18%
KU PSP 561	\$492	\$617	\$916	\$1,129	\$1,341	25%	48%	23%	19%
KU PSS 562	\$4,486	\$5,402	\$8,035	\$10,055	\$12,112	20%	49%	25%	20%
KU RS 010	\$13,573	\$16,831	\$23,918	\$29,493	\$34,646	24%	42%	23%	17%
KU RTS 550	\$3,390	\$4,165	\$6,109	\$7,577	\$8,965	23%	47%	24%	18%
KU TODP 571	\$2,644	\$3,289	\$4,847	\$5,973	\$7,089	24%	47%	23%	19%
KU TODS 572	\$3,262	\$4,187	\$6,292	\$7,856	\$9,439	28%	50%	25%	20%
KU TODP 563	\$6,307	\$7,856	\$11,590	\$14,283	\$16,957	25%	48%	23%	19%
KU GS 113	\$2,379	\$3,003	\$4,388	\$5,431	\$6,468	26%	46%	24%	19%
KU AES 224	\$311	\$380	\$550	\$681	\$807	22%	45%	24%	18%
KU Lights	\$257	\$308	\$445	\$547	\$647	20%	44%	23%	18%

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 9

Responding Witness: Robert M. Conroy

- Q-9. With regard to Mr. Conroy's response to KSBA Question No. 20 (First Request for Information) please describe the facilities that would be idled.
- A-9. Delivery to sports fields may include but not be limited to the service of offices, locker rooms, concession stands, and field lighting. Such uses may be aggregated or separate. The Company believes such consumption does occur in peak period hours.

Service may be at a secondary or primary voltage level. That portion of Company facilities used but not allocated to serve "ball fields" under the assumption that usage is only off-peak as indicated by KSBA through secondary transformers, the primary distribution system, the transmission system, or from the generation fleet would not be recovered from "ball field" customers. In effect, these facilities would be idle and cost recovery would be shifted to other customers.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 10

Responding Witness: Robert M. Conroy

- Q-10. With regard to Mr. Conroy's response to KSBA Question No. 20 (First Request for Information) please explain how an off-peak secondary load idles generation, transmission and primary distribution facilities that are sized and otherwise used to serve peak hour load.
- A-10. The Company disagrees with the premise of the question. Mr. Conroy's response to KSBA Question No. 20 (First Request for Information) clearly states the Company believes "ball field" consumption does occur during the peak period. See also the response to Question No. 9.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 11

Responding Witness: John P. Malloy

- Q-11. With regard to Mr. Malloy's response to KSBA Question No. 16 (First Request for Information) please explain how the attached letter (as Exhibit 1) from KU is not confirmation that KU does currently advise customers of their best available rate option and that KU makes the initial contact? Please explain when this practice was initiated or resumed.
- A-11. As previously stated, "[i]t is the customer's responsibility to determine the best available rate option. Upon a customer's request the Company performs a rate review of any optional rates available to the customer." While KU does not have a duty to inform any customer of, or place a customer on, the most financially advantageous rate, that fact does not preclude KU from notifying its customers that they might find another rate more financially advantageous. The letter to which KSBA refers does not "advise customers of their best available rate option[.]" Instead, the letter suggests another available rate might be financially beneficial to the customer, and invites the customer to contact KU to discuss the matter. KU views this as providing good customer service, which KU has endeavored to provide since its founding. But KU has not initiated a practice of contacting customers to "advise customers of their best available rate option."

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 12

Responding Witness: Robert M. Conroy

- Q-12. Please provide the number of garages, pumps, ball field lighting, storage sheds, pumps and traffic lights served on Rate AES prior to August 1, 2010.
- A-12. KU does not have a business reason to maintain ongoing files with the requested information segregated according to requested parameters. The information below represents KU's effort to extract the data according to the requested parameters.

KU's records do not identify the specific facility type. Based on the Business Partner Name, it appears that there are 26 sports related facilities including ball fields, concession stands, athletic buildings and 2 storage buildings.

CASE NO. 2014-00371

Response to Supplemental Request for Information of Kentucky School Boards Association (KSBA) Dated February 6, 2015

Question No. 13

Responding Witness: Greg Thomas / Dr. Martin J. Blake

- Q-13. With regard to Dr. Blake's response to KSBA question No. 8 (First Request for Information) please respond to the following;
 - a) Is your answer based on personal knowledge? If yes, please provide the locations you have observed. If no, please provide the names and titles of employees or agents who assisted in preparation of your answer and the locations they visited.
 - b) Please provide a one-line electrical diagram for a typical AES, PS-sec and TODS service.
 - c) What would be the class rate of return if secondary lines were not allocated the Rate AES as shown on pages 29 and 33 of MJB-9?

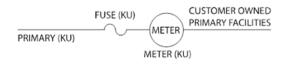
A-13.

a. The allocation method was the result of conversations with Howard Bush, Manager – Tariffs/Special Contracts, and Mike Leake, Manager – Electrical Engineering/Planning, at LG&E and KU.

b.



TYPICAL AES SECONDARY, PS, AND TODS SERVICE



TYPICAL AES PRIMARY SERVICE

c. KU disagrees with the premise of the questions. Since KU owns the secondary lines that are used to serve AES customers, it would be inappropriate not to allocate secondary lines to Rate AES. Therefore, Dr. Blake has not performed the requested analysis.