

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

In the Matter of:

**APPLICATION OF LOUISVILLE GAS AND ELECTRIC)
COMPANY AND KENTUCKY UTILITIES COMPANY TO)
INSTALL AND OPERATE ELECTRIC CHARGING STATIONS)
IN THEIR CERTIFIED TERRITORIES, FOR APPROVAL) CASE NO.
OF AN ELECTRIC VEHICLE SUPPLY EQUIPMENT RIDER,) 2015-00355
AN ELECTRIC VEHICLE SUPPLY EQUIPMENT RATE, AN)
ELECTRIC VEHICLE CHARGING RATE, DEPRECIATION)
RATE, AND FOR A DEVIATION FROM THE REQUIREMENTS)
OF CERTAIN COMMISSION REGULATIONS)**

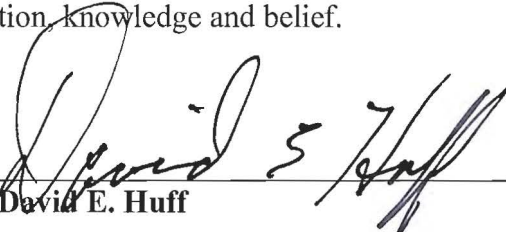
**RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY
TO
COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
DATED FEBRUARY 25, 2016**

FILED: MARCH 3, 2016

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **David E. Huff**, being duly sworn, deposes and says that he is Director of Customer Energy Efficiency & Smart Grid Strategy 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 that the answers contained therein are true and correct to the best of his information, knowledge and belief.



David E. Huff

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 2nd day of March 2016.



Notary Public (SEAL)

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


VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Rick E. Lovekamp**, being duly sworn, deposes and says that he is Manager – Regulatory Affairs/Tariffs 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.


Rick E. Lovekamp

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 2nd day of March 2016.


Notary Public (SEAL)

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

**LOUISVILLE GAS AND ELECTRIC COMPANY
AND
KENTUCKY UTILITIES COMPANY**

**Response to Commission Staff's Third Request for Information
Dated February 25, 2016**

Case No. 2015-00355

Question No. 1

Witness: David E. Huff

- Q-1. Refer to the application, Exhibit 1, the proposed Electric Vehicle Charging ("EVC") tariff for each of the Companies, Terms and Conditions, paragraph 2. This paragraph states, "EV Customer is required to pay by means of credit card or Charging Station Supplier Account."
- a. State whether the Charging Station Supplier refers to ChargePoint. If not, identify the Charging Station Supplier.
 - b. Explain what is meant by "Charging Station Supplier Account" and how such an account is obtained.
 - c. Explain whether the money paid at an EVC charging station, either with a credit card or Charging Station Supplier account, is paid wholly and directly to the Companies or only in part and/or through a third party.
- A-1.
- a. Yes, ChargePoint is the Charging Station Supplier.
 - b. A Charging Station Supplier Account is a method of payment for users of ChargePoint charging stations, and may be used to initiate a charging session. Customers may establish a Charging Station Supplier Account and obtain a ChargePoint account Radio Frequency Identification ("RFID") card by contacting ChargePoint (either by phone or through its website) and setting up the account with a credit card. The user pays the same fee whether using a credit card or a ChargePoint account. A ChargePoint account has neither setup fees to create the account nor monthly maintenance fees. ChargePoint requires an initial \$25 account balance.
 - c. The monetary transactions at EVC charging stations are paid wholly to ChargePoint, who subsequently remits fees collected to the Companies.

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Question No. 2

Witness: Rick E. Lovekamp

- Q-2. Refer to the application, the Direct Testimony of Rick E. Lovekamp, page 6, lines 21-23, which state that, for the Electric Vehicle Supply Equipment ("EVSE") tariff, the Companies plan to use an assumed usage of 5,852 kWh annually. Given that the usage data from the electric vehicle charging stations ("charging stations") will be obtainable from the Charging Station Supplier to the Companies, explain why the EVSE tariff should not be updated annually to reflect actual usage from the previous year.
- A-2. As stated in Mr. Lovekamp's Testimony, the Companies will consider requesting authority to annually adjust the EVSE rate if usage patterns differ from original assumptions. Although general charging station usage data supports annual usage of 5,852 kWh, more localized data is needed to determine any changes to the predicted usage patterns.

Furthermore, this approach is consistent with Mr. Lovekamp's testimony related to the EVC tariff. The Companies intend to annually update the EVC fuel adjustment and environmental cost recovery factors as well as "reflect any changes in the average use of the charging stations." While the EVC and EVSE rates assume an annual usage of 5,852 kWh, usage patterns could differ between the two services.

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Question No. 3

Witness: David E. Huff

- Q-3. Refer to the Companies' response to Commission Staff's Second Request for Information ("Staff's Second Request"), Item 5. The response refers to a charging station that the Companies maintain at the Auburndale Service Center. Provide the following information related to this charging station:
- a. Type of charging station,
 - b. Users of the charging station, i.e., whether the charging station is open to the public or is available only for the Companies' personnel,
 - c. Capital costs and annual operation and maintenance expenses of the charging station, and
 - d. The cost to charging station users, if any.
- A-3.
- a. There are two brands of Level 2 chargers at the Auburndale Service Center: 1) AeroVironment and 2) Bosch Power Xpress. The AeroVironment stations are stand-alone EV chargers, while the Bosch station is part of an R&D project including a PV solar canopy and battery bank.
 - b. The charging stations at Auburndale Service Center are not accessible to the public and are for the use of company owned vehicles.
 - c. The capital cost for the AeroVironment charging station installed in 2013 at Auburndale Service Center is \$7,486. No maintenance costs have occurred. The capital costs for the 2015 R&D project that consisted of the Bosch Power Xpress charging station, the solar canopy and a second AeroVironment charging station are \$90,213. There have been no maintenance expense associated with these chargers.
 - d. There are no fees associated with these charging stations as they are for company owned vehicle use.

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Question No. 4

Witness: David E. Huff

- Q-4. Refer to the Companies' response to Staff's Second Request, Item 7. The response states that the proposed charging stations would permit drivers to know of a station's availability.
- a. State the methods by which drivers would be able to access this information.
 - b. State whether this ability would apply only to the EVC Tariff customers or if it would also apply to customers using charging stations installed under the EVSE and Electric Vehicle Supply Equipment – Rider ("EVSE-R") Tariffs.
- A-4.
- a. Drivers will be able to access this information through smart-phone applications (e.g., ChargePoint or PlugShare). These applications identify the location of charging stations and indicate availability. Additionally, the ChargePoint website will indicate the same information.
 - b. This ability applies to all stations under the EVC Tariff and for EVSE / EVSE-R stations which are open to public use. All EVC chargers installed will be available for public use. If a site host limits the availability of an EVSE / EVSE-R charger to its employees, information regarding the charger's location and availability would not appear online.

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Question No. 5

Witness: David E. Huff

- Q-5. Refer to the Companies' response to Staff's Second Request, Item 16. Provide the kW demand increase that could be experienced by an EVSE-R Tariff customer if the customer:
- a. Has a single charging station.
 - b. Has a dual charging station.
- A-5. a. Up to 7.2 kW - This is the maximum power draw for the charging station.
- b. Up to 14.4 kW - This is the maximum power draw for the charging station.

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Case No. 2015-00355

Question No. 6

Witness: David E. Huff

- Q-6. State whether the Companies have made any decisions as to the location of any EVC charging stations. If so, provide the locations. If not, provide the Companies' strategy regarding the placement of the charging stations.
- A-6. No, the Companies have not determined the location of any EVC charging station. The Companies' strategy regarding the placement of the charging stations is to consult with EV groups such as EVolve KY (an EV owners group), city sustainability personnel, and public entities to identify suitable locations. Criteria for site selection will include visibility, feasibility, potential for usage, cost, and safety.

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Question No. 7

Witness: Rick E. Lovekamp

- Q-7. Given that the fees proposed in the EVC tariff are calculated to recover all costs incurred to install, operate, and maintain the charging stations, explain whether the revenues, expenses, and costs associated with this tariff should be removed from the revenue requirement determination in the Companies' next base rate cases.
- A-7. The revenues, expenses, and costs associated with the EVC tariff should not be removed from the revenue requirement determination in the Companies' next base rate cases, but should be allocated as a separate rate class. This method is consistent with the cost of service principle of assigning the cost to the correct rate schedule.

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Question No. 8

Witness: David E. Huff

- Q-8. State whether the charging stations selected by the Companies are capable of time-of-use pricing. If so, explain why the Companies are not proposing such pricing in this proceeding and whether they plan to do so in the future. If not, state whether the Companies had the option of choosing charging stations capable of time-of-use pricing.
- A-8. Yes, the charging stations selected by the Companies are capable of time-of-use pricing. The Companies are not proposing such pricing for EVC at this time. Given the early stage of this offering, the Companies prefer to keep the charging fee structure simple at this time. The Companies will review all of the charging session data and metrics to determine if changes to the program would be beneficial. The Companies are open to time-of-use pricing in the future.