

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

**In the Matter of:**

<b>APPLICATION OF KENTUCKY</b>	)	
<b>UTILITIES COMPANY FOR AN</b>	)	
<b>ADJUSTMENT OF ITS ELECTRIC RATES</b>	)	<b>CASE NO. 2016-00370</b>
<b>AND FOR CERTIFICATES OF PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY</b>	)	

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**SUPPLEMENTAL REQUESTS OF SIERRA CLUB, ALICE HOWELL, AND CARL  
VOGEL TO KENTUCKY UTILITIES COMPANY**

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Pursuant to the Kentucky Public Service Commission’s December 13, 2016 Order (“Scheduling Order”), Sierra Club, Alice Howell, and Carl Vogel (“Intervenors”) hereby propound the following requests for information on Kentucky Utilities Company (“KU”) in the above-captioned proceeding. Intervenors’ below supplemental requests follow their initial set of data requests dated January 11, 2017 (“Sierra Club Initial Requests”), and KU’s responses thereto dated January 25, 2017 (“KU Initial Responses”).

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, 2017 deadline set forth in the Appendix to that order. Please produce the requested documents in electronic format to:

Casey Roberts  
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Denver, CO 80202  
Email: casey.roberts@sierraclub.org

Matthew E. Miller  
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Washington, DC 20001  
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Jonathan Wallach  
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5 Water Street  
Arlington, MA 02476  
jwallach@resourceinsight.com

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(s)/table(s)/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.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) vis-à-vis the 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 KU Initial Response to Sierra Club Initial Request 2(b).
  - a) For calendar year 2016, please provide the average monthly energy consumption per residential customer.
  - b) For calendar year 2016, please provide the average monthly class non-coincident peak demand per residential customer.
  - c) For calendar year 2016, please provide the average monthly individual customer maximum demand per residential customer.
  - d) For calendar year 2016, please provide the number of residential customers whose average monthly energy consumption falls between:
    - i) 0 kWh and 500 kWh;
    - ii) 501 kWh and 750 kWh;
    - iii) 751 kWh and 1,000 kWh;
    - iv) 1,001 kWh and 1,200 kWh;
    - v) 1,201 kWh and 1,500 kWh;
    - vi) 1,501 kWh and 2,000 kWh;
    - vii) 2,001 kWh and 2,500 kWh; and
    - viii) 2,501 kWh and 3,000 kWh.
  - e) For calendar year 2016, please provide the average monthly energy consumption per customer over all residential customers whose average monthly energy consumption falls between:
    - i) 0 kWh and 500 kWh;
    - ii) 501 kWh and 750 kWh;
    - iii) 751 kWh and 1,000 kWh;

- iv) 1,001 kWh and 1,200 kWh;
  - v) 1,201 kWh and 1,500 kWh;
  - vi) 1,501 kWh and 2,000 kWh;
  - vii) 2,001 kWh and 2,500 kWh; and
  - viii) 2,501 kWh and 3,000 kWh.
- f) For calendar year 2016, please provide the average monthly class non-coincident peak demand per customer over all residential customers whose average monthly energy consumption falls between:
- i) 0 kWh and 500 kWh;
  - ii) 501 kWh and 750 kWh;
  - iii) 751 kWh and 1,000 kWh;
  - iv) 1,001 kWh and 1,200 kWh;
  - v) 1,201 kWh and 1,500 kWh;
  - vi) 1,501 kWh and 2,000 kWh;
  - vii) 2,001 kWh and 2,500 kWh; and
  - viii) 2,501 kWh and 3,000 kWh.
- g) For calendar year 2016, please provide the average monthly individual customer maximum demand per customer over all residential customers whose average monthly energy consumption falls between:
- i) 0 kWh and 500 kWh;
  - ii) 501 kWh and 750 kWh;
  - iii) 751 kWh and 1,000 kWh;
  - iv) 1,001 kWh and 1,200 kWh;
  - v) 1,201 kWh and 1,500 kWh;
  - vi) 1,501 kWh and 2,000 kWh;
  - vii) 2,001 kWh and 2,500 kWh; and
  - viii) 2,501 kWh and 3,000 kWh.

2. Reference KU Initial Response to Sierra Club Initial Request 3(d).
  - a) For calendar year 2016, please provide the average monthly class non-coincident peak demand per residential distributed generation customer.
  - b) For calendar year 2016, please provide the average monthly individual customer maximum demand per residential distributed generation customer.
3. Reference KU Initial Response to Sierra Club Initial Request 5(b).
  - a) Please identify the specific spreadsheet in the Company's response to PSC 1-53 that was used to derive KU Initial Response to Sierra Club Initial Request 5(a).
  - b) Please provide a complete description of all modifications made to the spreadsheet used to derive KU Initial Response to Sierra Club Initial Request 5(a).
4. Reference KU Initial Response to Sierra Club Initial Request 6.
  - a) Please identify all relevant non-privileged documents other than pre-filed testimony by William S. Seelye and Robert M. Conroy that are "already in the record," as the Company's response implies.
5. Reference KU Initial Response to Sierra Club Initial Request 16.
  - a) Please provide the number of residential service drops in the Company's service territory as of year-end 2016.
  - b) Please provide the number of residential customers as of year-end 2016.
  - c) Please provide the number of service drops to multi-family buildings in the Company's service territory as of year-end 2016.
  - d) Please provide the number of residential customers residing in multi-family housing as of year-end 2016.
  - e) Please provide the number of secondary line transformers serving residential customers as of year-end 2016.
  - f) Please provide the number of secondary line transformers serving residential multi-family buildings as of year-end 2016.
  - g) Does the Company employ guidelines for sizing of line transformers? If so, please provide copies of such guidelines.
  - h) Has the Company studied the impact of load diversity on loadings on distribution equipment? If so, please provide copies of all such studies.

6. Reference KU Initial Response to Sierra Club Initial Request 17(d).
  - a) Please provide an electronic spreadsheet, with all cell formulas and file linkages intact, that calculates the Company's estimate of the residential intra-class subsidy resulting from the recovery of demand-related costs through the energy charge.
7. Reference KU Initial Response to Sierra Club Initial Request 19.
  - a) Please provide the number of customers who expressed interest in the RTOD-Demand rate option.
  - b) Of the customers who expressed interest in the RTOD-Demand rate option, how many did the Company perform "ad hoc calculations" on to determine potential savings.
  - c) Please provide copies of all documentation, including electronic spreadsheets with all cell formulas and file linkages intact, of the Company's "ad hoc calculations."
  - d) Please provide copies of all workpapers, including electronic spreadsheets with all cell formulas and file linkages intact, relied on to determine "that the on-peak demand charge was overstated."
8. Reference KU Initial Response to Sierra Club Initial Request 23(e).
  - a) Please provide detailed instructions for modifying the Excel spreadsheet for the cost of service study provided in PSC 1-53 in order to classify 100% of pole, conduit, conductor, and line transformer costs as demand-related.
9. Reference KU Application, Schedule N (Attachment to Tab 67).
  - a) Please provide a working electronic spreadsheet version of the "typical bill comparison," with cell formulas and file linkages intact.
10. Reference Direct Testimony of John P. Malloy, page 20, lines 8 to 20.
  - a) Please describe in detail any differences between the AMS meters and associated network technology installed as part of the Company's AMS Customer Offering, and the AMS metering technology that the Company now proposes to deploy to all residential customers.

Dated: February 7, 2017

Respectfully submitted,



*Of counsel*  
(licensed *pro hac vice* in Kentucky):

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*Counsel for Sierra Club, Alice Howell, and  
Carl Vogel*

### **CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of the SUPPLEMENTAL DATA REQUESTS OF SIERRA CLUB, ALICE HOWELL, AND CARL VOGEL TO KENTUCKY UTILITIES COMPANY for full intervention in these actions is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on February 7, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being hand delivered to the Commission.



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JOE F. CHILDERS