

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

**Supplemental Response to Sierra Club's Initial Data Requests for Information  
Dated January 11, 2017**

**Question No. 20**

**Responding Witness: Counsel**

Q-20. Reference William Steven Seelye at p. 24, II. 20-21.

- a) Please provide the basis for your assessment that the demand charge structure currently in use for the Company's large customers "seems to operate effectively," including an explanation of what constitutes "effective" operation in this context.
- b) Please provide copies of any internal memoranda, reports, or other documents in the Company's possession that indicate that the demand charge structure currently in use for the Company's large customers would "operate effectively" for residential customers.

A-20.

- a) Original Response. The demand charge structure currently in use for the Company's large customers has been in place for many years. It has been the subject of review in every rate case since the early 1990s. The Company's largest customers have been very active in those rate cases, expressing any concerns they have regarding the demand charge structure in use for Rates TODS, TODP, RTS and FLS.
- b) Original Response. See the Company's objection filed on January 20, 2017. The Company has not identified any non-privileged documents.

February 9, 2017 Supplemental Response.

The Company has searched for documents responsive to this request and thoroughly reviewed documents initially included in its privilege log as responsive to this request. Having now completed those processes, the Company has concluded there are no documents responsive to this request.