

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR AN)	
ADJUSTMENT OF ITS ELECTRIC AND)	CASE NO. 2016-00371
GAS RATES AND FOR CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	

**DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO KENTUCKY SCHOOL BOARDS ASSOCIATION**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to Kentucky School Boards Association (“KSBA”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 13, 2016.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, KSBA, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if KSBA receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If KSBA objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of KSBA, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

KU:

1. Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Willhite in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Willhite, please provide an electronic version of those documents with all formulas intact.
2. Please provide the names of individuals who assisted Mr. Willhite in preparing his testimony, including providing assistance with any analysis performed to support his testimony. For each such individual, provide the following:
 - a. The name of the organization for whom the individual is employed.
 - b. A description of the assistance that was performed in support of Mr. Willhite's testimony.
3. If not provided in response to question 1, provide an electronic version of the "School Class" Cost of Service Studies referenced on page 5, lines 35-36, and elsewhere in Mr. Willhite's direct testimony with all formulas intact.
4. Provide the workpapers, source data, and Excel spreadsheets with formulas intact of the (1/1.18758) coincidence factor referenced on page 5, lines 44-45 of Mr. Willhite's direct testimony.
5. Provide a detailed description of how the (1/1.18758) coincidence factor referenced on page 5, lines 44-45 of Mr. Willhite's direct testimony was determined.
6. Provide the workpapers, source data, and Excel spreadsheets with formulas intact of the (.59729) ratio of the Summer AES CP to Summer AES NCP referenced on page 6, lines 1-3, of Mr. Willhite's direct testimony.
7. Provide a detailed description of how the (.59729) ration of the Summer AES CP to Summer AES NCP referenced on page 6, lines 1-3, of Mr. Willhite's direct testimony was determined.
8. Provide the following for Rate P-12 Public School, Time of Day Service, rate proposed by Mr. Willhite:
 - a. A consumption analysis in Excel format for all customers that would take service under Rate P-12 Public School, Time of Day Service.
 - b. Provide all source data for part a.

- c. A detailed calculation in Excel format of the revenue by rate component, and in total, calculated at the LG&E's current rate and at the proposed P-12 Public School, Time of Day Service, rate proposed by Mr. Willhite.
 - d. Provide a detailed description of how the billing determinants for each rate component were determined.
 - e. Provide all calculations in Excel format with formulas intact used to develop the billing determinants for each rate component.
9. Provide the following for Rate P-12 Public School, Power Service, rate proposed by Mr. Willhite:
 - a. A consumption analysis in Excel format for all customers that would take service under Rate P-12 Public School, Power Service.
 - b. Provide all source data for part a.
 - c. A detailed calculation in Excel format of the revenue by rate component, and in total, calculated at the LG&E's current rate and at the proposed P-12 Public School, Power Service, rate proposed by Mr. Willhite.
 - d. Provide a detailed description of how the billing determinants for each rate component were determined.
 - e. Provide all calculations in Excel format with formulas intact used to develop the billing determinants for each rate component.
10. Provide all support, including source data, for the billing determinants shown in RLW Exhibit 4. If the information was based on an analysis of data for individual schools, provide the name, location and account number and billing data for the individual schools.
11. Provide a detailed description of how the demand charges shown in RLW Exhibits 2 through 4 were developed.
12. Provide the calculations showing the derivation of the demand charges shown in RLW Exhibits 2 through 4 were developed.
13. Please indicate whether the billing unit data shown on RLW Exhibit 4 is based on forecasted test-year data. If yes, provide the methodology used to conform the data to the Company's test year.
14. Refer to RLW Exhibit 1. Please explain in detail why rate base and operating expenses change between the results titled "Summary of Rate of Return by Class w/Proposed School Rate" and the results titled "Summary of Rate of Return by class w/Proposed School Rate @ Rate AES ROR."

15. Provide load data to support the following statements on page 5, lines 8-12, of Mr. Willhite's testimony: "In a nutshell school load build up typically begins around 7 am, peaks by lunch time in the warmer months and declines at a significant pace until and after the instructional day ends in early-afternoon. In the colder months schools tend to peak across the morning hours and similar to the warm periods usage/peak decline after lunch."
16. Provide the load data Mr. Willhite relied on to compare school load to the load of "industries" and the load of "stores" as discussed on page 5, lines 1-12 of his testimony.

LG&E:

1. Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Willhite in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Willhite, please provide an electronic version of those documents with all formulas intact.
2. Please provide the names of individuals who assisted Mr. Willhite in preparing his testimony, including providing assistance with any analysis performed to support his testimony. For each such individual, provide the following:
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8. Provide the following for Rate P-12 Public School, Time of Day Service, rate proposed by Mr. Willhite:
 - a. A consumption analysis in Excel format for all customers that would take service under Rate P-12 Public School, Time of Day Service.
 - b. Provide all source data for part a.
 - c. A detailed calculation in Excel format of the revenue by rate component, and in total, calculated at the LG&E's current rate and at the proposed P-12 Public School, Time of Day Service, rate proposed by Mr. Willhite.
 - d. Provide a detailed description of how the billing determinants for each rate component were determined.
 - e. Provide all calculations in Excel format with formulas intact used to develop the billing determinants for each rate component.
9. Provide the following for Rate P-12 Public School, Power Service, rate proposed by Mr. Willhite:
 - a. A consumption analysis in Excel format for all customers that would take service under Rate P-12 Public School, Power Service.
 - b. Provide all source data for part a.
 - c. A detailed calculation in Excel format of the revenue by rate component, and in total, calculated at the LG&E's current rate and at the proposed P-12 Public School, Power Service, rate proposed by Mr. Willhite.
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12. Provide the calculations showing the derivation of the demand charges shown in RLW Exhibits 2 through 4 were developed.

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14. Refer to RLW Exhibit 1. Please explain in detail why rate base and operating expenses change between the results titled "Summary of Rate of Return by Class w/Proposed School Rate" and the results titled "Summary of Rate of Return by class w/Proposed School Rate @ Rate AES ROR."
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16. Provide the load data Mr. Willhite relied on to compare school load to the load of "industries" and the load of "stores" as discussed on page 5, lines 1-12 of his testimony.

Dated: March 17, 2017

Respectfully submitted,

A handwritten signature in blue ink, reading "Kendrick R. Riggs", is written over a horizontal line.

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*Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company*

CERTIFICATE OF COMPLIANCE

This is to certify that Kentucky Utilities Company's and Louisville Gas and Electric Company's March 17, 2017 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 17, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six copies, in paper medium of the Data Requests, are being mailed by U.S. First Class Mail, postage prepaid, to the Commission on March 17, 2017.



*Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company*