

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

In the matter of: : CASE NO. 2016-00370

APPLICATION OF KENTUCKY UTILITIES :  
COMPANY FOR AN ADJUSTMENT OF ITS :  
ELECTRIC RATES AND FOR CERTIFICATES :  
OF PUBLIC CONVENIENCE AND NECESSITY :

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**SUPPLEMENTAL REQUEST FOR INFORMATION OF KSBA**

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The Kentucky School Boards Association (KSBA) intervener in this action, and respectfully requests the applicant, Kentucky Utilities Company, to respond to the Supplemental Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.

B. Restate the information inquiry immediately preceding each response.

C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KSBA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

#### Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means Kentucky Utility Company or the witness, as the context requires.

2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which Kentucky Utility Company or its officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.

3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals

and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

(a) are now or were formerly in your possession, custody or control; or

(b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts

of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

9. The term "warranty company" means any company, individual, entity or other organization that engages in the business of providing or arranging for services on utility lines, including but not limited to gas, electric, water or sewer in a consumers home, apartment or other place of abode.

#### **SUPPLEMENTAL REQUEST FOR INFORMATION OF KSBA**

1. Following the Commission Order in this proceeding authorizing the AMS program what is the earliest date an AMS meter can be installed and activated for billing purposes?
2. Please cite cases and PSC Orders where operating expense recovery with a multi-year installation program such as the proposed AMS was included in a test period. Describe in detail the elements of those particular programs.
3. Please explain why it would not be appropriate to record both the plant and operating cost associated with the partial installation of the AMS program in CWIP.
4. With regard to Att\_KU\_PSC\_1\_53 KUElecCossA and Att\_KU\_PSC\_1\_53 KUElecCossB please provide the source of the input data and all work papers showing the derivation of the data in the following:
  - a. Columns G and H in the "Bill Det" tab.

- b. Column C in “Meters” tab.
  - c. Column C in “Services” tab.
  - d. Line 903 Remove ECR revenues in “AllocationProforma” tab.
  - e. Line 909 Late Payment Revenue in “AllocationProforma” tab.
  - f. Line 910 Misc Service Revenue Allocator in “AllocationProforma” tab.
5. Regarding the response to KSBA – 8 please provide the rate schedules of the other utilities Mr. Seelye refers to in his testimony.
  6. Regarding the response to KSBA – 34 please describe in detail the costs recorded in “FERC Annual Electric Program Cost Charges”.
  7. Please respond to the second part of KSBA – 2 (reference response to PSC 2-74): “Please describe any such situations that are currently not metered?”
  8. With regard to PSC\_DR2\_KU\_ATTACH\_to\_Q97 please provide the source and supporting documents of the SID Ratios in line 8773.

Respectfully submitted,

/s/Matt Malone

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Counsel for the Petitioner,  
**KENTUCKY SCHOOL BOARDS ASSOCIATION**

**CERTIFICATE OF SERVICE**

It is hereby certified, this the 6<sup>th</sup> day of February, 2017, that the attached Supplemental Request for Information of KSBA is a true and correct copy of the document being filed in paper medium; that the electronic filing has been transmitted to the Commission on February 6, 2017; that there are currently no parties that have been excused from participation by electronic service; that an original and six copies of this document are being mailed to the Commission for filing on February 6, 2017; and that an electronic notification of the electronic filing will be provided to all counsel listed on the Commission's service list in this proceeding.

/s/Matt Malone  
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ATTORNEY FOR KSBA