

**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 :

RESPONSE OF KSBA TO KENTUCKY UTILITIES COMPANY'S DATA REQUESTS

Respectfully submitted,

/s/Matt Malone

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CERTIFICATE OF SERVICE

It is hereby certified, this the 3rd day of April 2017, that the attached 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 March 31st 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 hand-delivered to the Commission for filing on April 3, 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

ATTORNEY FOR KSBA

KENTUCKY UTILITIES COMPANY

CASE NO. 2016-00370

**Response to KU's Request For Information
To The Kentucky School Boards Association**

Question No. 1

Responding Witness: Ronald Willhite

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.

Response:

Please refer to the Response to Staff Question 2 and,

Att #1 KSBA_KU 2014-00396 Vaughn Testimony

Att #2 KSBA_KU AMS notes

Att #3 KSBA_KU Testimony KU 2014-00371 Exhibits 2 & 3

Att #4 KSBA_KU KU Final Report FY2016

Att #5 KSBA_KU Question No. 10

Att #6 KSBA_KU Corrected RLW Exhibit 1

Att #7 KSBA_KU AES #1 Billings

Att #8 KSBA_KU AES #2 Billings

Att #9 KSBA_KU Post filing Billings

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**Response to KU's Request For Information
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Question No. 2

Responding Witness: Ronald Willhite

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.

Response:

Mr. Willhite performed the analysis and developed his testimony. Various individuals from LGE-KU served public school districts and Mr. Nipple, SEMP Project Manager, provided utility account data collected to comply with KRS160.325 and Board Energy Management policies.

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Question No. 3

Responding Witness: Ronald Willhite

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.

Response:

Please refer to the Response to Staff Question No. 2.

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Question No. 4

Responding Witness: Ronald Willhite

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.

Response:

Please refer to the Response to Staff Question No. 2:

Att #8 KSBA_Staff 2016_PSC_DR2_KU_Attach_to_Q97 RLW Work Copy

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To The Kentucky School Boards Association**

Question No. 5

Responding Witness: Ronald Willhite

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.

Response:

The factor was determined by LGE-KU. Please refer to cell j8773 in:

Att #8 KSBA_Staff 2016_PSC_DR2_KU_Attach_to_Q97 RLW Work Copy

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**Response to KU's Request For Information
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Question No. 6

Responding Witness: Ronald Willhite

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.

Response:

Please refer to Staff Question No. 2:

Att #8 KSBA_Staff 2016_PSC_DR2_KU_Attach_to_Q97 RLW Work Copy

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**Response to KU's Request For Information
To The Kentucky School Boards Association**

Question No. 7

Responding Witness: Ronald Willhite

7. Provide a detailed description of how 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 was determined.

Response:

The ratio was determined by the dividing cell J8767 by cell \$AN\$8771 (Summer CC Coincident Peak/Loss Adjusted NCP) in:

Att #8 KSBA_Staff 2016_PSC_DR2_KU_Attach_to_Q97 RLW Work Copy

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Question No. 8

Responding Witness: Ronald Willhite

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.

Response:

Please refer to the Responses to Staff Question No. 1, 2 and 3 and Company Questions No. 1 and 10.

Att #4 KSBA_Staff COSS #1 Billings

Att #5 KSBA_Staff COSS #2 Billings

Att #6 KSBA_Staff COSS #3 Billings

Att #7 KSBA_Staff COSS #4 Billings

Att #9 KSBA_KU Post filing Billings

The billing determinants were determined from FY2016 individual public school account data. FY2015 data was used for two districts.

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**Response to KU's Request For Information
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Question No. 9

Responding Witness: Ronald Willhite

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.

Response:

Please refer to the Responses to Staff Question No. 1, 2 and 3 and Company Questions No. 1 and 10.

Att #4 KSBA_Staff COSS #1 Billings

Att #5 KSBA_Staff COSS #2 Billings

Att #6 KSBA_Staff COSS #3 Billings

Att #7 KSBA_Staff COSS #4 Billings

Att #9 KSBA_KU Post filing Billings

The billing determinants were determined from FY2016 individual public school account data. FY2015 data was used for two districts.

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Question No. 10

Responding Witness: Ronald Willhite

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.

Response:

Please refer to the Responses to Staff Questions No. 1, 2 and 3 and Company Question No. 1.

Please see Att #5 KSBA_KU Question No. 10

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Question No. 11

Responding Witness: Ronald Willhite

11. Provide a detailed description of how the demand charges shown in RLW Exhibits 2 through 4 were developed.

Response:

Please refer to the Response to Staff Question 3.

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Question No. 12

Responding Witness: Ronald Willhite

12. Provide the calculations showing the derivation of the demand charges shown in RLW Exhibits 2 through 4 were developed.

Response:

Please refer to the Response to Staff Question 2.

Att #3 KSBA_Staff COSS KU Bill DET Summary

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Question No. 13

Responding Witness: Ronald Willhite

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.

Response:

No, based on FY2016 actual billing unit data. FY2015 data was used for two districts.

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Question No. 14

Responding Witness: Ronald Willhite

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."

Response:

RLW Exhibit 1 as filed inadvertently included erroneous numbers for the "Proposed School Rate" case. Att #6 KSBA_KU Corrected RLW Exhibit 1 is a corrected RLW Exhibit 1.

Rate base does not change. Only expenses for the School Class change because revenues are reduced which reduces computed taxes.

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Question No. 15

Responding Witness: Ronald Willhite

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 end 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."

Response:

See Question No. 1 Att #3 KSBA_KU Testimony KU 2014-00371 Exhibits 2 & 3

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Question No. 16

Responding Witness: Ronald Willhite

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.

Response:

See Question No. 1 Att #3 KSBA_KU Testimony KU 2014-00371 Exhibits 2 & 3