

**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 :

FIRST REQUEST FOR INFORMATION OF KSBA

The Kentucky School Boards Association (KSBA) intervener in this action, and respectfully requests the applicant, Kentucky Utilities Company, to respond to the First 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."

FIRST REQUEST FOR INFORMATION OF KSBA

1. Regarding the AMS Program please respond:
 - a. Please provide the average rate class cost increase per customer (bill impact) of the employing AMS (smart) meters.
 - b. Will the added cost be fully recovered in the customer charge? If not, please explain.
 - c. Please provide the installed cost of an AMS meter for a typical 3-phase school (50 to 1000 KW) account(s).
 - d. With the installation of the AMS meters how will the billing usage data be retrieved and processed differently from existing procedures.
 - e. Are the existing smart meters in place under the DSM-EE (Enernoc) Program functionally equivalent to the proposed AMS meters? If not, please explain in detail the differences.

- f. Please confirm that the employment of the AMS meters will permit coincident demand billing. If not, please explain.
 - g. With full employment of the AMS meters in a rate class does the Company plan to implement coincident demand billing. If not, please explain.
 - h. Please provide a detail explanation of how the cost of the AMS meters is allocated or assigned to rate case in Mr. Seelye's cost of service studies.
 - i. Please provide the Company's schedule for installing the AMS meters by rate class.
 - j. Does the Company believe public schools subject to KRS 160.325 are better positioned currently to derive the benefits described by Mr. Malloy in his testimony than residential and other commercial customers of similar size?
 - k. Will the Company commit to install the AMS meters first on public school accounts to facilitate the intent of the General Assembly codified in KRS 160.325.
2. With regard to Mr. Conroy's testimony at page 20 please list or describe the types of situations he envisions would not be metered. Please describe any such situation that are currently not metered?
 3. Please confirm the Company will continue the demand response (ENERNOC) program.
 4. When does the Company expect to convert non-demand rates to a time-of-day structure?
 5. Has the Company considered upon installation of the AMS meters converting to conjugative meter reading and billing for single sites where there are multiple metering points?
 6. Please provide the Company's billing analysis used to conclude implementing a 100 % base demand ratchet in Rate Schedules TODS and TODP is revenue neutral to the company.

7. What consideration did the Company give to the impact on existing Rate TOD customers from increasing the base demand ratchet to 100 % and provide any analysis performed to determine the impact on existing customers?
8. Provide copies of the rate schedules Mr. Seelye lists in his testimony at pages 29 and 30 where ratchets apply.
9. Does the Company agree that a KW charge penalizes customers when applied to a NCP compared to a class or system CP?
10. Please provide for each rate class the unit cost component sheets similar to Rate RS provided in Exhibit-WSS-2.
11. Please clarify what Mr. Seelye at page 56 of his testimony is referring to as the LED “fixture”.
12. Please describe the process for a customer to convert existing lights to LED and possible costs for such conversions?
13. With the rapid decline being experienced in the cost of LED fixtures as suppliers respond to market conditions of increased suppliers and users please explain how the Company will adjust the proposed rates to reflect the cost reductions.
14. Does the Company concur that LED maintenance costs are less than existing HPS, Mercury Vapor and Metal Halide technologies? If so, please explain how this is recognized in the proposed rate design. If not, please explain.
15. Will the Company consider providing LED outside lighting that can be set on timers and/or remotely controlled to facilitate dark-campus energy management.

16. Please provide copies all calculations, work papers and any other supporting documents including but not limited to load research reports used to develop the Allocation Factor Tables in Exhibits WSS-18 (Exhibit -WSS-23 LGE) and Exhibit-WSS-19 (Exhibit –WSS-24 LGE).
17. Please provide copies of all available peak day load profiles for any school accounts recorded in the last five years and include the rate schedule for each account. (Note: To avoid disclosing confidential and propriety information please provide only the load profile data and attendant rate schedule.)
18. Please provide copies of all available peak day load profiles for rate schedules GS, AES (KU), PS-sec and TODS recorded in the last five years and include the rate schedule for each account. (Note: To avoid disclosing confidential and propriety information please provide only the load profile data and attendant rate schedule.)
19. Please provide a copy of all class loss factors used in the development of Exhibits-WSS-18 (Exhibit-WSS-23 LGE) and Exhibit-WSS-19 (Exhibit-WSS-24 LGE) and any supporting studies and documentation.
20. Please provide load profiles for each monthly peak day as listed on the 2015 FERC Form 1 page 401b provided in Tab 41 for each company.
21. What are rate refunds for 2014 and 2015 Blake Schedule I-1?
22. Please provide a copy of FERC Form 1 page 401b for the years 2013 through 2015.
23. Please provide the Company system peaks in the Form 1 page 401 format and hourly profiles in Excel format for each peak day shown for the years 2015 and 2016.
24. Please provide the combined LGE-KU monthly system peaks in the Form 1 page 401 format and hourly profiles in Excel format for each peak day shown for the years 2015 and 2016.

25. Please provide the Company's current estimate of expected amount and percentage revenues increases to be passed through the ECR, DSM and FAC mechanisms for the next five years.
26. With regard to Garrett Schedule D-1 page 7 of 8 line 124:
 - a. What function will the employees who were charging time to capital projects perform going forward?
 - b. Provide the dollar amount for these employees included in the adjustment.
27. Please explain how the solar project tax credits per Garrett Schedule D-1 page 8 of 8 are assigned to classes in Exhibit-WSS-18 (Exhibit-WSS-23 LGE) and Exhibit-WSS-19 (Exhibit-WSS-24 LGE).
28. With regard to Garrett Schedule D-1 page 1 please explain the decrease in commercial bill determinants and the decrease for each rate class.
29. With regard to Garrett Schedule D-1 page 3 (LGE pages 3-4) lines 51 and 61 please provide the amounts not offset by the FAC pro forma adjustment.
30. With regard to Garrett Schedule D-1 please provide a reconciliation of all accounting reclassifications such as shown on page 3 line 53.
31. With regard to Garrett Schedule D-1 Page 4 Line 73 please explain and provide calculations quantifying the "depancaking" adjustment.
32. With regard to Garrett Schedule D-1 Page 8 please provide a separation of the depreciation expense adjustment from the proposed new depreciation rates by the existing and new plant for the test period.
32. Please explain how solar costs are allocated to rate classes in Exhibit-WSS-18 (Exhibits – WSS-23 LGE) and Exhibits-WSS-19 (Exhibit –WSS-24 LGE).

33. With regard to Garrett Schedule D-1 pages 7 A&G acct 923 please list the outside services by provider, amount, project purpose and contract duration.
34. With regard to Garrett Schedule D-1 page 8 please breakout the regulatory expense for the base period and adjustment by case.
35. Please confirm that the peak month and time used in DSM program evaluation is July week day at 2 pm.
36. Please provide for Exhibit-WSS-19 (Exhibit-WSS-24 LGE) a table detailing the system and rate class hourly loads and computed LOLP products provided in Response to Staff 1 Attachment PSC 1-53.
37. Please provide the derivation of the fixed charge, energy and O&M rates used in Exhibit-WSS-4.
38. Explain the reasons for the difference in proposed customer charges for rates AES and GS as including the differences between single phase and three phase.
39. Please provide the Company's policy for the provision of secondary conductors for non-residential customers.
 - a. Please confirm that KU provides the secondary conductor for single phase GS and AES service.
 - b. Please confirm AES served customers provide secondary conductor if needed similar to PS-secondary and TODS served customers.
40. Please provide the detail calculation of the LED estimated investment cost and copies of the following:

Note From 'G:\LED Development (Begin Dec. 2015)\Calculations\KU\[(LED w ug cobras) KU 10-10-2016.xlsx]Pole Upgrade'!F34

Note: From CE16*AVERAGE('G:\LED Development (Begin Dec.

2015)\Calculations\KU\[(LED w ug cobras) KU 10-10-2016.xlsx]Shared
Data!\$F\$31,'G:\LED Development (Begin Dec. 2015)\Calculations\KU\[(LED w ug cobras)
KU 10-10-2016.xlsx]Shared Data!\$F\$40)

Respectfully submitted,

/s/Matt Malone

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CERTIFICATE OF SERVICE

It is hereby certified, this the 11th day of January, 2017, that the attached First 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 January 11th, 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 January 11, 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