

**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 THE COMMISSION STAFF'S DATA REQUESTS**

---

Respectfully submitted,

/s/Matt Malone

Matthew R. Malone  
William H. May, III.  
Hurt, Deckard & May PLLC  
127 West Main Street  
Lexington, Kentucky 40507  
(859) 254-0000 (office)  
(859) 254-4763 (facsimile)  
[mmalone@hdmfirm.com](mailto:mmalone@hdmfirm.com)  
[bmay@hdmfirm.com](mailto:bmay@hdmfirm.com)

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

**CERTIFICATE OF SERVICE**

It is hereby certified, this the 3<sup>rd</sup> 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 31<sup>st</sup> 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 Commission Staff's Request For Information To The Kentucky School Boards Association**

### **Question No. 1**

#### **Responding Witness: Ronald Willhite**

1. Refer to the Testimony of Ronald L. Willhite ("Willhite Testimony"), page 5, lines 38- 39. State the number of schools served under rate schedule PS-Secondary and under rate schedule TODS. Include in the response the reasons why they are not served under rate schedule AES.

#### **Response:**

KSBA does not maintain individual public school account utility data. Based on data provided by each of the 79 school districts who receive KU service there are currently 143 PS-Secondary and 101 TODS public P – 12 learning center and support accounts.

A public P – 12 school would not be served on rate schedule AES because:

1. Not all electric, or
2. On service after Case No. 2010-00221, or
3. Chose another applicable rate.

For purposes of his testimony Mr. Willhite uses the term “school” consistent with his understanding of the Company’s use wherein each metered P - 12 learning center and support account is considered a customer. Because of the configuration of each P – 12 learning center service may be provided under multiple accounts. For example, there may be a separately metered main building, building addition, annex, auditorium or gym. Please see KSBA’s Response to the Company’s Question No, 10 for a list of the public school accounts.

Each district has other smaller ancillary electric service accounts such as sports fields, bus garages, central offices, pumps, portable units, signs, maintenance buildings and outdoor lighting. These accounts for the most part are typically served on Rates GS and AES. Sports fields coming on service after Case 2010-00221 with demands greater than 50 kw are served on Rate Schedule PS.

Mr. Willhite is proposing implementation of RATE P – 12 PUBLIC SCHOOL Power Service and RATE P – 12 PUBLIC SCHOOL Time of Day Service for the learning center and support accounts with average kw loads greater than 50 kw. In addition, any sports field not presently served on Rates GS or AES would be served on a sports field rider to either Rate Schedule PS or the proposed RATE P – 12 PUBLIC SCHOOL. Alternatively, the Availability Clause in either Rate GS or AES could be modified to permit service to sports fields.

All remaining public school accounts would be served on applicable rates.

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

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

**Question No. 2**

**Responding Witness: Ronald Willhite**

2. Refer to the Willhite Testimony, RLW Exhibit 1. Provide all calculations and workpapers supporting the amounts in the tables in Excel spreadsheet format.

**Response:**

Att #1 KSBA\_Staff - Att\_KU\_PSC\_1-53\_KUElecCossB \_School Rate @AES ROR

Att #2 KSBA\_Staff Att\_KU\_PSC\_1-53\_KUElecCossB \_School Rate @Overall ROR

Att #3 KSBA\_Staff COSS KU Bill DET Summary

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 #8 KSBA\_Staff 2016\_PSC\_DR2\_KU\_Attach\_to\_Q97 RLW Work Copy

**KENTUCKY UTILITIES COMPANY**

**CASE NO. 2016-00370**

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

**Question No. 3**

**Responding Witness: Ronald Willhite**

3. Refer to the Willhite Testimony, RLW Exhibits 2 and 3. Explain how each rate on the tariffs was developed.

**Response:**

The basic service and energy rates are the current charges

Billing units for FY2016 were provided by affected public school districts and accumulated for Rates PS – Secondary and TODS as recorded from actual bills. Using the determined excessive revenues of \$2,550,000 the change in the current demand charges were reduced by the per unit reduction (\$3.985 for PS-Secondary and \$1.23 for TODS) necessary to produce the \$2,550,000 reduction for current Rate PS - Secondary and TODS. The TODP demand charges were determined by reducing the secondary charges by \$.50 and then converting to a kva charge at a .9 power factor.

Please see Att #3 KSBA\_Staff COSS KU Bill DET Summary.