## 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

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Counsel for the Petitioner,

KENTUCKY SCHOOL BOARDS ASSOCIATION

## **CERTIFICATE OF SERVICE**

It is hereby certified, this the 26<sup>th</sup> day of May 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 May 26<sup>th</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 May 26<sup>th</sup>, 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 Post-Hearing Request for Information To The Kentucky School Boards Association

## **Question No. 1**

**Responding Witness: Ronald Willhite** 

- 1. Refer to the April 19, 2017 Stipulation and Recommendation, Section 4.11, Optional Pilot Rates for Schools Subject to KRS 160.325.
  - A. State whether KSBA would agree to include schools, grades K-12, that are not subject to KRS 160.325 in the Optional Pilot Rates for Schools.
  - B. If the Optional Pilot Rates for Schools were established by tariff as a permanent rate class by KU and LG&E, state KSBA's position on including schools, grades K-12, that are not subject to KRS 160.325 in that rate class.

# **Response:**

- a) KSBA is agreeable to the inclusion of schools, grades K-12, that are not subject to KRS 160.325 in the Optional Pilot Rates for Schools.
- b) KSBA believes the vast majority of schools, K-12, both subject to KRS 160.325 and not subject to KRS 160.325 to be homogenous in their load profile/usage and therefore KSBA is agreeable to the inclusion of schools that are not subject to KRS 160.325 if a permanent rate class were established; it may also be reasonable as to require each school governing body (district or diocese board) have an Energy Management Policy to qualify for inclusion in the rate.