

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

In the matter of: : CASE NO. 2016-00371

THE ELECTRONIC APPLICATION OF LOUISVILLE :  
GAS & ELECTRIC COMPANY FOR AN :  
ADJUSTMENT OF ITS ELECTRIC AND GAS RATES :  
AND FOR CERTIFICATES OF PUBLIC :  
CONVENIENCE AND NECESSITY :

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**RESPONSE OF THE KENTUCKY SCHOOL BOARDS ASSOCIATION TO THE  
LOUISVILLE GAS AND ELECTRIC COMPANY'S DATA REQUESTS**

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Respectfully submitted,

/s/Matt Malone

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**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, 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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to LGE'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\_LGE 2014-00396 Vaughn Testimony

Att #2 KSBA\_LGE AMS notes

Att #3 KSBA\_LGE Testimony LGE 2014-00372 Exhibits 2 & 3

Att #4 KSBA\_LGE LG&E Final Report FY2016

Att #5 KSBA\_LGE Question No.10

Att #6 KSBA\_LGE #5 Billings

Att #7 KSBA\_LGE Post Filing Billings

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

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

**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.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

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

**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.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

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

**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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to LGE's Request For Information  
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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

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

**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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to LGE'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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**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

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

**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 Questions 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 #7 KSBA\_LGE Post Filing Billings

The billing determinants were determined from FY2016 individual public school account data.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

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

**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 Questions 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 #7 KSBA\_LGE Post Filing Billings

The billing determinants were determined from FY2016 individual public school account data.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

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

**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 #5 KSBA\_LGE Question No.10

**LOUISVILLE GAS AND ELECTRIC COMPANY**

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**Response to LGE's Request For Information  
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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.

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to LGE's Request For Information  
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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 LGE Bill DET Summary

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to LGE's Request For Information  
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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.



**LOUISVILLE GAS AND ELECTRIC COMPANY**

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**Response to LGE's Request For Information  
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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:

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

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2016-00371**

**Response to LGE's Request For Information  
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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\_LGE Testimony KU 2014-00372 Exhibits 2 & 3

**LOUISVILLE GAS AND ELECTRIC COMPANY**

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**Response to LGE's Request For Information  
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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\_LGE Testimony LGE 2014-00372 Exhibits 2 &  
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