

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

In the matter of: : CASE NO. 2017-00321

ELECTRONIC APPLICATION OF DUKE ENERGY :
KENTUCKY, INC. FOR: 1) AN ADJUSTMENT OF :
THE ELECTRONIC RATES; 2) APPROVAL OF AN :
ENVIRONMENTAL COMPLIANCE PLAN AND :
SURCHARGE MECHANISM; 3) APPROVAL OF :
NEW TARIFFS; 4) APPROVAL OF ACCOUNTING :
PRACTICES TO ESTABLISH REGULATORY :
ASSETS AND LIABILITIES, AND 5) ALL OTHER :
REQUIRED APPROVALS AND RELIEF :

**KENTUCKY SCHOOL BOARDS ASSOCIATION’S FIRST REQUEST FOR
INFORMATION**

The Kentucky School Boards Association (KSBA), by counsel, respectfully requests Duke Energy Kentucky, Inc., 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 Duke Energy Kentucky, Inc. 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 Duke Energy Kentucky, Inc. 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. Please provide copies all calculations, work papers and any other supporting documents including but not limited to load research reports used to develop the coincident and non-coincident demands in Witness Ziolkowski Work Paper FR-16(7)(V) pages 32, 40, 41, 43, and 45.
2. Please describe the origin of the data used Witness Ziolkowski to develop Work Paper FR-16(7)(V) pages 41, 43, and 45 and confirm it is from the "January through December 2010" period. If yes, please explain why the Company has not conducted load research since 2010 for these rate classes.
3. Please confirm the "Observed" data used Witness Ziolkowski to develop Work Paper FR-16(7)(V) page 40 LoadRes DS is from a statically significant sample for the January through December 2016 period. If not, please describe the origin of the data.
4. Please provide the number on customers served on Tariff DS by 25 kw August billing demand blocks (e.g. 0 – 25 kw, 26 – 50 kw, 51 -75 kw, etc.).
5. With regard to Witness Ziolkowski Work Paper FR-16(7)(V) pages 40 and 41 (Rate DS) please provide the number of K – 12 schools in the "Observed" groups.
6. Please provide the 24 – hour monthly system peak day load profiles in Excel format for all K – 12 school accounts recorded since 2010 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.*)

7. Please provide the 24 – hour monthly system peak day load profiles for the “observed” groups on Witness Ziolkowski Work Paper FR-16(7)(V) pages 40 and 41 (Rate DS), page 43 (Rate DTSEC) and page 45 (Rate EH).
8. Please provide the origin and supporting documents for the data in each cell in columns B through L in Witness Ziolkowski Work Paper FR-16(7)(V) pages 40, 41, 43, and 45.
9. Please provide the Company system peaks in the Form 1 page 401 format and 24- hour profiles in Excel format for each system monthly peak day shown for the years 2012 through 2016, and 2017 through September.
10. Please provide a copy of FERC Form 1 page 401b for the years 2013 through 2016.
11. Please provide FERC Form 1 page 401b information for 2017 through September.
12. Please provide by SIC Code the number of customers on Rate DS separated by “Small and Medium” and “Large” consistent with Witness Ziolkowski Work Paper FR-16(7)(V) pages 40 and 41.
13. Please reconcile present revenues as shown on FR16-(7)(v)-3 Prod Demand line 865 with Schedule M present revenues. (e.g. - RS: \$129,123,808 vs. \$120,391,018).
14. Please reconcile sales by rate class as shown on FR16-(7)(v) DS Sec - KW with Schedule M – 2.2 sales.
15. In Schedule M-2.2 page 3 of 20 Column D (Sales) please provide the KW demand separated between metered and billed.
16. Please provide the test period rate of return by rate classes on present rates.
17. Please describe in detail the process for developing all forecast billing determinates by rate class and provide all related work papers, assumptions and documents.

Respectfully submitted,

/s/Matt Malone

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CERTIFICATE OF SERVICE

It is hereby certified, this the 26th day of October, 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 October 26, 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 on October 27, 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