

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY AND KENTUCKY UTILITIES)	
COMPANY FOR REVIEW, MODIFICATION,)	
AND CONTINUATION OF CERTAIN)	CASE NO. 2017-00441
EXISTING DEMAND-SIDE MANAGEMENT)	
AND ENERGY EFFICIENCY PROGRAMS)	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY
TO WAL-MART STORES EAST, LP AND SAM'S EAST, INC.'S
REQUESTS FOR INFORMATION
REGARDING REBUTTAL TESTIMONY
DATED JUNE 7, 2018

FILED: JUNE 14, 2018

**LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY**

**Response to Wal-Mart Stores East, LP and Sam's East, Inc.'s
Requests for Information
Regarding Rebuttal Testimony
Dated June 7, 2018**

Case No. 2017-00441

Question No. 1

Witness: Rick E. Lovekamp

- Q-1. Referring to the Rebuttal Testimony of Rick Lovekamp ("Lovekamp Rebuttal") at page 12, beginning at line 23, where Mr. Lovekamp indicates that the Companies' definition of "energy intensive"...appears more likely to include customers with genuinely energy-intensive processes," please provide, without identifying specific customers, the peak demand and annual electrical usage of each customer who would be eligible to participate in the Industrial Opt-Out as proposed by the Companies in their Application.
- A-1. See attached, which provides the requested information for January 2015 through June 2016 for customers taking service under Rates FLS, RTS, and TODP (to be consistent with the table provided on page 11 of Mr. Lovekamp's testimony), which customers the Companies understood to be industrial as of June 2016. Note that the Companies' proposed opt-out criteria further require that a customer certify that (1) the customer is industrial according to the Companies' proposed definition and (2) the customer has implemented cost-effective energy-efficiency measures not subsidized by other rate classes for each meter the customer seeks to opt out. Therefore, it is not possible for the Companies to know how many customers' meters are fully eligible to opt out under the opt-out criteria the Companies have proposed.

Meter	Peak kVA or kW	Annualized Volume (kWh)
1	23,483	141,667,200
2	1,754	12,351,996
3	2,279	13,577,604
4	3,344	19,812,264
5	574	216,600
6	4,070	24,449,604
7	723	4,322,796
8	1,688	1,170,396
9	1,186	8,244,804
10	1,601	7,622,400
11	782	3,777,600
12	651	624,000
13	7,393	48,032,004
14	14,990	74,472,000
15	2,568	14,337,600
16	865	3,373,332
17	23,202	166,767,996
18	4,104	19,335,996
19	8,824	38,676,000
20	601	1,267,200
21	912	2,489,604
22	872	4,322,196
23	102,061	649,935,996
24	8,588	52,012,800
25	2,480	11,978,400
26	4,535	272,004
27	7,883	816,000
28	1,140	2,343,204
29	4,308	25,392,000
30	2,919	20,425,596
31	723	2,310,396
32	7,695	52,290,396
33	1,349	2,876,400
34	2,019	4,849,596
35	4,110	22,422,396
36	3,061	16,556,400
37	2,427	14,072,004
38	325	915,996
39	15,203	99,243,204
40	2,017	13,440,000
41	7,060	36,441,996
42	1,489	7,926,000

Meter	Peak kVA or kW	Annualized Volume (kWh)
43	1,279	5,852,004
44	916	4,953,600
45	16,031	83,027,196
46	1,050	2,691,996
47	604	3,624,000
48	7,155	43,459,200
49	1,096	2,222,400
50	779	4,400,400
51	11,130	71,887,200
52	16,929	64,102,824
53	4,892	26,624,004
54	8,243	52,789,332
55	477	1,053,444
56	1,925	9,536,796
57	575	338,136
58	1,279	6,418,404
59	976	770,004
60	10,907	68,345,604
61	10,035	64,057,596
62	14,391	54,619,200
63	5,289	14,105,604
64	3,439	18,544,800
65	2,756	18,110,400
66	6,465	20,808,000
67	1,498	8,409,600
68	1,080	6,427,800
69	4,217	28,112,004
70	721	3,827,196
71	1,992	11,059,200
72	2,445	8,678,400
73	7,015	29,361,336
74	1,177	5,666,400
75	4,012	14,217,600
76	750	495,996
77	2,127	9,015,996
78	1,972	12,124,800
79	1,980	9,967,200
80	2,337	11,022,396
81	1,428	7,106,196
82	9,126	57,456,000
83	307	1,437,600
84	2,019	8,568,600

Meter	Peak kVA or kW	Annualized Volume (kWh)
85	4,524	23,468,796
86	1,200	4,976,796
87	764	1,526,004
88	6,478	41,925,396
89	1,538	8,002,404
90	1,567	6,423,996
91	4,111	22,804,800
92	1,640	8,198,400
93	403	906,804
94	2,816	16,593,600
95	4,140	11,507,196
96	4,069	18,528,000
97	4,362	31,536,000
98	4,419	29,734,800
99	11,997	47,823,996
100	4,903	26,966,400
101	2,099	12,200,796
102	43,083	260,313,048
103	5,243	34,822,404
104	2,029	176,004
105	937	2,657,604
106	751	3,774,396
107	2,059	7,851,996
108	4,111	9,124,800
109	484	2,649,396
110	5,662	28,449,600
111	3,513	10,880,796
112	3,640	26,192,400
113	1,093	6,829,596
114	1,454	9,468,804
115	1,402	4,861,596
116	3,174	7,284,804
117	344	1,339,800
118	1,505	9,936,000
119	5,684	25,668,000
120	4,987	4,700,004
121	5,771	33,862,404
122	11,327	58,612,800
123	395	1,266,804
124	346	80,004
125	1,723	9,437,604
126	846	3,401,604

Meter	Peak kVA or kW	Annualized Volume (kWh)
127	1,025	4,320,000
128	1,959	11,281,596
129	1,925	9,135,996
130	11,014	69,292,800
131	6,331	35,856,000
132	3,204	18,222,396
133	442	661,200
134	681	1,958,400
135	6,342	24,288,000
136	1,654	10,306,800
137	27,427	134,720,004
138	1,494	7,011,204
139	3,084	15,180,804
140	4,029	14,667,600
141	6,129	32,931,204
142	1,226	7,529,604
143	5,448	15,615,996
144	2,974	7,248,000
145	615	3,307,200
146	6,349	28,160,328
147	7,185	51,179,580
148	1,742	10,396,800
149	30,656	201,087,996
150	497	882,396
151	3,993	8,403,204
152	5,948	40,027,200
153	3,079	15,315,204
154	22,204	153,849,600
155	1,605	6,494,400
156	877	2,495,472
157	2,026	10,495,200
158	8,912	57,139,200
159	14,948	91,670,400
160	7,092	49,843,200
161	9,220	59,995,200
162	2,539	16,718,400
163	1,163	3,164,004
164	6,668	33,948,240
165	621	3,540,804
166	9,450	73,728,000
167	5,732	30,591,996
168	1,483	8,886,000

Meter	Peak kVA or kW	Annualized Volume (kWh)
169	1,209	5,999,196
170	1,225	6,992,004
171	5,421	31,065,600
172	320	1,612,404
173	844	3,084,396
174	1,194	5,681,400
175	2,547	4,745,604
176	14,022	82,806,396
177	12,659	53,926,404
178	3,101	17,094,000
179	4,240	27,555,204
180	3,081	12,398,400
181	5,463	16,028,004
182	1,450	2,149,596
183	916	2,594,400
184	1,609	9,065,604
185	2,766	7,289,604
186	2,640	13,219,200
187	405	2,038,404
188	38,800	248,618,904
189	3,625	21,382,404
190	14,456	63,168,000
191	1,155	2,057,604
192	1,481	3,433,596
193	6,001	14,372,088
194	1,275	5,522,400
195	3,020	18,240,000
196	1,182	3,435,204
197	1,371	7,043,196
198	1,170	6,663,204
199	2,732	11,577,600
200	1,245	4,465,320
201	4,947	35,631,600
202	4,119	29,766,396
203	1,174	4,588,800
204	586	2,768,400
205	828	4,099,200
206	1,756	12,539,196
207	821	4,532,796
208	2,522	14,169,600
209	879	4,724,400
210	534	1,132,800

Meter	Peak kVA or kW	Annualized Volume (kWh)
211	494	2,482,404
212	450	1,386,804
213	1,138	3,449,604
214	3,841	14,578,668
215	252	1,054,404
216	3,377	19,746,000
217	814	2,132,796
218	3,942	22,437,600
219	504	1,523,604
220	1,491	8,126,400
221	1,356	7,193,604
222	1,497	2,651,196
223	3,065	9,947,196
224	846	3,345,600
225	8,227	57,696,000
226	11,676	73,752,000
227	871	5,268,804
228	76,238	458,724,000
229	1,528	3,679,200
230	490	1,127,436
231	1,221	3,297,600
232	562	1,663,620
233	648	243,900
234	1,079	5,797,440
235	1,077	5,901,300
236	619	316,800
237	2,507	3,676,116
238	1,328	2,080,800
239	297	450,000
240	5,176	32,482,476
241	14,043	87,667,200
242	250	388,800
243	250	155,376
244	12,397	39,770,184
245	1,444	2,520,000
246	10,334	44,184,960
247	450	576,000
248	37,500	34,594,560
249	2,564	5,004,000
250	303	823,680
251	1,125	5,947,200
252	336	864,000

Meter	Peak kVA or kW	Annualized Volume (kWh)
253	540	828,000
254	250	441,600
255	375	453,600
256	1,500	43,200
257	7,908	51,811,200
258	1,062	2,946,660
259	192,168	522,949,497

**LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY**

**Response to Wal-Mart Stores East, LP and Sam's East, Inc.'s
Requests for Information
Regarding Rebuttal Testimony
Dated June 7, 2018**

Case No. 2017-00441

Question No. 2

Witness: Rick E. Lovekamp

- Q-2. Referring to the Lovekamp Rebuttal at page 15, beginning at line 7, where Mr. Lovekamp references the language of KRS 278.285(3) and states that "customer classes benefitting from DSM-EE programs should pay for the cost of the programs," please state whether any customers who take service under Rate Schedules TODP, Rate RTS, Rate FLS, IGS, AAGS, SGSS or Rate FT would be ineligible to participate in the Industrial Opt-Out as proposed by the Companies in their Application.
- A-2. Yes, a customer with a meter served under any of those rates would not be eligible to opt out that meter if the customer does not certify that (1) the customer is industrial according to the Companies' proposed definition and (2) the customer has implemented cost-effective energy-efficiency measures not subsidized by other rate classes regarding that meter.

**LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY**

**Response to Wal-Mart Stores East, LP and Sam's East, Inc.'s
Requests for Information
Regarding Rebuttal Testimony
Dated June 7, 2018**

Case No. 2017-00441

Question No. 3

Witness: Rick E. Lovekamp

- Q-3. If the Companies' answer to Question No. 2 is yes, please identify:
- (a) the number of customers by rate class who would be ineligible to participate in the Industrial Opt-Out proposed by the Companies in their Application; and
 - (b) whether any of the customers would be eligible to participate in any Demand Side Management ("DSM") programs offered by the Companies?
- A-3. (a) See the response to Question No. 2. It is not possible for the Companies to know how many customers or meters would be ineligible to opt out.
- (b) Customers ineligible to opt out would be eligible to participate in any DSM-EE programs offered to such customers. LG&E does not offer, and has not proposed to offer, DSM-EE programs to customers served under Rates IGS, AAGS, SGSS, and FT. Therefore, those customers do not pay any DSM-EE charges.

**LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY**

**Response to Wal-Mart Stores East, LP and Sam's East, Inc.'s
Supplemental Data Requests
Regarding Rebuttal Testimony
Dated June 7, 2018**

Case No. 2017-00441

Question No. 4

Witness: Rick E. Lovekamp

Q-4. Referring to the Lovekamp Rebuttal at page 9, beginning at line 9, where Mr. Lovekamp claims that Walmart Witness Baker's definition of "industrial" is over-inclusive, please identify:

- (a) the number of customers by rate class who would be eligible to participate in the Industrial Opt-Out using the definition proposed by the Companies in their Application; and
- (b) the number customers by rate class who would be eligible to participate in the Industrial Opt-out using the definition proposed by Walmart Witness Mr. Baker in his Direct Testimony.

A-4.

- (a) See the table below for the number of customers served under Rates FLS, RTS, TODP, IGS, AAGS, SGSS, and FT. Please note that the numbers of meters shown in the table below for Rates FLS, RTS, and TODP are for customers the Companies understood to be industrial as of June 2016; the meter counts for Rates IGS, AAGS, FT, and SGSS are as of December 2017:

Rates	Number of Eligible Meters
FLS	1
RTS	39
TODP	219
IGS	246
AAGS	4
FT	65
SGSS	1

Note that the Companies' proposed opt-out criteria further require that a customer certify that (1) the customer is industrial according to the Companies' proposed definition and (2) the customer has implemented cost-effective energy-efficiency measures not subsidized by other rate classes for each meter the customer seeks to opt out. Therefore, it is not possible for the Companies to know how many customers' meters are fully eligible to opt out under the opt-out criteria the Companies have proposed.

- (b) See the table below for the number of customers served under Rates FLS, RTS, TODP, and TODS as of June 2016:

Rates	Number of Total Eligible Meters
FLS	1
RTS	39
TODP	358
TODS	986