

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

In the matter of: : CASE NO. 2018-00294

APPLICATION OF KENTUCKY UTILITIES :
COMPANY FOR AN ADJUSTMENT OF ITS :
ELECTRIC RATES :

:

**KENTUCKY SCHOOL BOARDS ASSOCIATION’S FIRST REQUEST FOR
INFORMATION TO KENTUCKY UTILITIES COMPANY**

The Kentucky School Boards Association (KSBA) intervener in this action, respectfully requests the applicant, Kentucky Utilities Company, 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 Kentucky Utilities Company 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 Kentucky Utilities Company 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 monthly KU system, combined system and class peak day 24- hour load profiles in Excel format for all K – 12 school accounts recorded in the last five years by rate schedule for each account.

2) Please provide monthly KU system, combined system and class peak day 24 – hour load profiles in Excel format for rate schedules GS, AES (KU), PS-sec and TODS recorded in the last five years by rate schedule for each account.

3) Please provide 24 - hour system load profiles in Excel format for each monthly KU system peak day as listed on the FERC Form 1 page 401b for the last five years.

4) Please provide a copy of FERC Form 1 page 401b for the years 2015 through 2018.

5) Please provide the combined LGE-KU monthly system peaks in the Form 1 page 401 format and 24 – hour load profiles in Excel format for each monthly peak day shown for the last five years.

6) Please explain and provide an example of the process to develop the COSS demand allocation factors using load research for the GS, PS-Secondary and TODS classes.

7) With regard to the prior School Energy Managers Program, when did the Company first determine that they no longer had applicable avoided capacity costs and when evaluating DSM programs when was that recognition first reflected.

Rate Design

- 8) How were the kw to kva demand conversion factors for Rate TODS determined?
- 9) Please provide executable versions of the Jurisdictional & Class cost of service studies (Note: KSBA was unable to manipulate the responses to PSC 1-53).
- 10) Please provide the number of customers by SIC Code served on Rates PS and TODS.
- 11) Please provide all workpapers for the development of the LOLP allocation factors provided in response the PSC Staff 1 – 53 and Exhibit WSS- 19.

Pilot School Rates

- 12) With reference to the spread sheet provided by Paul Weis on 9/1/17 by email to KSBA:
 - a. Please provide a list of the participating pilot school accounts that required a new meter in order to bill those accounts on the applicable pilot school rate.
 - b. Please provide a list of the participating pilot school accounts where a new/replacement meter was installed and why the meter was installed.
 - c. Please confirm that KSBA on August 8 provided district authorizations for accounts to be switched to the pilot rates.
 - d. Why was August 18, 2017 chosen as the effective date of the applicable pilot rate rather than July 1, 2017 as directed by the Commission’s Order in Case No. 2016-00370 or 00371.
 - e. Please explain why the first pilot rate bills for many of the accounts were prorated.
 - f. Please provide a list of the candidate school accounts provided by KSBA on July 20, 2017 that required no follow up by the Company.
- 13) With reference to School Pilot Tariffs Report No. 2, in the Findings section:
 - a) When was the stated “random sample of customers taking service under KU’s standard rate schedules (Rate PS, Rate TODS, and Rate TODP)” conducted?
 - b) What was the sample size and how many accounts were sampled for each of Rate PS, Rate TODS, and Rate TODP?
 - c) For each sampled account of Rate PS, Rate TODS, and Rate TODP provide the SIC Code.
- 14) Please provide Appendix A and B in EXCEL format referenced in the status report dated June 22, 2018.

- 15) Please provide monthly KU system, combined system and class peak day 24- hour load profiles in Excel format for all the participating SPS and STOD accounts recorded from July 1, 2017 to date.
- 16) Please provide hourly load data for each participating SPS and STOD accounts recorded from July 1, 2017 to date.
- 17) Please provide by participating SPS and STOD account monthly billing determinants from July 1, 2017 to date.
- 18) Please revise the company's COSS to include Rate Classes SPS and STOD to facilitate determination of whether to extend the pilot school tariffs or to make them permanent as envisioned by the Commission's June 22, 2017 Orders in PSC Case Nos. 2016-00370 and 2016-00371.
- 19) Please provide monthly KU system, combined system and class peak day 24 – hour load profiles in Excel format for each pilot school rate (SPS and STOD) account recorded since July 1, 2017.
- 20) Please provide a copy of the School Pilot tariffs Report No. 3 when it is filed in December 2018.

Company Capacity

- 21) Please provide the reserve margin for each company and the combined companies by year from 2010 thru 2017.
- 22) Please provide the planned reserve margin for each company and the combined companies by year from 2018 thru 2027.

Municipal Load Loss

- 23) Based on statements from Witness Blake, please provide a list of the municipal wholesale customers who are leaving the KU system.
- 24) Please provide by year and vacating municipal customer their contribution to KU's monthly system peaks for the years 2010 through 2018.
- 25) Please provide the percentage jurisdictional generation and transmission demand allocation factors for the municipals (separately by vacating and remaining) and ODP for the years 2010 through 2018.
- 26) Please confirm transmission costs for the vacating municipals recovered under OATT in the same amount as the previously bundled rate for full requirements service? If not, please explain why not.

27) Please provide the test period transmission revenues for the vacating Municipal customers.

28) Does KU plan to sell or have the Municipals asked to buy the primary facilities used to serve the vacated Municipals. If so, how would the price be determined?

29) Please provide a copy of the transmission tariff under which the vacating Municipals take service going forward.

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
bmay@hdmfirm.com

Counsel for the Petitioner,
KENTUCKY SCHOOL BOARDS ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that KSBA's November 13, 2018 electronic filing is a true and accurate copy of KSBA's pleading and Read 1st Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on November 13, 2018; that an original and one copy of the filing will be delivered to the Commission within two business days of November 13, 2018; that there are currently no parties excused from participation by electronic service; and that, on November 13, 2018, electronic mail notification of the electronic filing is provided to all parties of record:

/s/Matt Malone
ATTORNEY FOR KSBA