

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

In the matter of: : CASE NO. 2018-00295

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

**KENTUCKY SCHOOL BOARDS ASSOCIATION’S SUPPLEMENTAL REQUEST FOR
INFORMATION TO LOUISVILLE GAS & ELECTRIC COMPANY**

The Kentucky School Boards Association (KSBA) intervener in this action, respectfully requests the applicant, Louisville Gas and Electric Company, to respond to the Supplemental 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 Louisville Gas and Electric 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 Louisville Gas and Electric 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."

SUPPLEMENTAL REQUEST FOR INFORMATION OF KSBA

1. With regard to the Company's response to KSBA's First Request for Information Question No. 1 please provide the requested monthly LG&E system and combined system peak day 24- hour load profiles for all K – 12 school accounts recorded from January 2016 to date in the same Excel format as provided in PSC Case No. 2014-00371 (2014-00372 for LGE).

2. With regard to the Company's response to KSBA's First Request for Information Question No. 2 please provide the requested monthly LG&E system, combined system and class peak day 24- hour load profiles for rate schedules GS, AES (KU), PS-sec and TODS accounts recorded for the three 12-month periods calculated to support Cases 2018-00294, 2016-00371, and 2014-00371 in the same Excel format as provided in PSC Case No. 2014-00371 (2014-00372 for LGE).

3. With regard to the Company's response to KSBA's First Request for Information Question No. 8:

a. Was the conversion factor calculation made using data from all TODS accounts. If not, how many accounts were used and what tests were conducted to verify the results were representative of the total class,

b. Please provide in Excel format the details of the calculation of the conversion factors.

4. With regard to the Company's response to KSBA's First Request for Information Question No. 14 please provide in Excel format the monthly energy, coincident peak (CP) and non-coincident (NCP) demands for each pilot account from July 1, 2017 to date.

5. With regard to the Company's response to KSBA's First Request for Information Question No. 15 the request was for 24- hour load profiles in Excel format for all the participating SPS and STOD accounts recorded from July 1, 2017 to date for the monthly LG&E system, combined system and class peak days. Please provide the requested 24- hour load profiles in the same Excel format as provided in PSC Case No. 2014-00371 (2014-00372 for LGE).

6. With regard to the Company's response to KSBA's First Request for Information Question No. 16 please provide the requested hourly load data in the same Excel format as provided in PSC Case No. 2014-00371 (2014-00372 for LGE).
7. With regard to the Company's response to KSBA's First Request for Information Question No. 20 please provide all workpapers associated with any data, results or conclusions used in compilation of the School Pilot tariff Report No. 3.
8. With regard to the Company's response to KSBA's First Request for Information Question No. 22 please provide the peak load and supply resource amounts by year and Company used to calculate the provided reserve margins.
9. With regard to the Company's responses to KSBA's First Request for Information Question No.26 and Question No.27 please provide the test period revenues individually for network service, reactive supply and voltage control, energy imbalance, regulation and frequency response, and operating and spinning reserves for the vacating municipals.
10. With regard to the Company's response to KSBA's First Request for Information Question No. 28 has the Company considered selling the facilities on a net reproduction cost new basis? If not, please explain why not.
11. With regard to the attachment to the Company's response to KSBA's First Request for Information Question No. 17 please provide the account name and account number for each numerically referenced pilot account in the column labelled 'Account' in the provided file.
12. With regard to the Company's response to KSBA's First Request for Information Question No. 12(f) please describe the nature of the follow up for each pilot account subsequent to KSBA's provision of district rate change authorization forms on August 8, 2017.
13. With regard to attachment "**2018 AG DR1 KU Attach to Q137b LOLP**" to the Company's response to AG First Q-137b:
 - a. Please provide all workpapers or other documents showing the development of the SID ratios for each class.
 - b. Please provide a description of how the hourly loads for the classes were developed from load research data and/or from other metered data.
 - c. Please all the workpapers or other documents showing the determination of the 8760 hourly loads for each class.
 - d. Please provide for each class the time period when the hourly data was collected.
14. With regard to the Company's response to KSBA's First Request for Information Question No. 4 and Question No. 5 please provide the Form 1 page 401b information for each month, January thru November 2018.
15. With regard to the Company's response to KSBA's First Request for Information Question no. 5 please provide the 24-hour data for the available peak day months of 2018.

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 December 13, 2018, 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 December 13, 2018; that an original and one copy of the filing will be delivered to the Commission within two business days of December 13, 2018; that there are currently no parties excused from participation by electronic service; and that, on December 13, 2018, electronic mail notification of the electronic filing is provided to all parties of record:

/s/Matt Malone

ATTORNEY FOR KSBA