

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY )  
UTILITIES COMPANY FOR AN ADJUSTMENT )  
OF ITS ELECTRIC RATES, A CERTIFICATE OF )  
PUBLIC CONVENIENCE AND NECESSITY TO )  
DEPLOY ADVANCED METERING ) Case No. 2020-00349  
INFRASTRUCTURE, APPROVAL OF CERTAIN )  
REGULATORY AND ACCOUNTING )  
TREATMENTS AND ESTABLISHMENT OF )  
A ONE YEAR SUR-CREDIT )

AND

ELECTRONIC APPLICATION OF LOUISVILLE )  
GAS AND ELECTRIC COMPANY FOR AN )  
ADJUSTMENT OF ITS ELECTRIC AND GAS )  
RATES, A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO DEPLOY ) Case No. 2020-00350  
ADVANCED METERING INFRASTRUCTURE, )  
APPROVAL OF CERTAIN REGULATORY AND )  
ACCOUNTING TREATMENTS AND )  
ESTABLISHMENT OF A ONE YEAR SUR-CREDIT )

**SUPPLEMENTAL DATA REQUESTS OF JOINT INTERVENORS MOUNTAIN  
ASSOCIATION, KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR  
ENERGY SOCIETY AND METROPOLITAN HOUSING COALITION TO LOUISVILLE  
GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY**

Tom FitzGerald  
Kentucky Resources Council, Inc.  
P.O. Box 1070  
Frankfort, KY 40602  
(502) 551-3675  
[Fitz@kyrc.org](mailto:Fitz@kyrc.org)

Counsel for Joint Intervenors  
Mountain Association, Kentucky  
Solar Energy Society, Kentuckians For  
The Commonwealth and  
Metropolitan Housing Coalition

Dated: May 5, 2021

## DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to

provide full and complete answers to any request, “you” or “your” may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.

11. “Company” means Louisville Gas & Electric Company and Kentucky Utilities Company and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed, and affiliated companies including Pennsylvania Power and Light.

12. “Joint Intervenors” means the Mountain Association (Case No. 2020-0349 only), Kentuckians For The Commonwealth, Kentucky Solar Energy Society, and Metropolitan Housing Coalition (Case No. 2020-0350 only).

### **INSTRUCTIONS**

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify, and produce for discovery and inspection each such document.

2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement, and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.

3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.

5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.

7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**SUPPLEMENTAL DATA REQUESTS PROPOUNDED TO LOUISVILLE GAS AND ELECTRIC COMPANY (LG&E) AND KENTUCKY UTILITIES COMPANY (KU) BY JOINT INTERVENORS**

**LGE/KU\_JI\_Data\_Request\_3**

**Question 3-1**

Has the Company incurred any costs to serve net metering customers relating to technical electrical operations of the grid? Please provide itemized details on a per-facility basis, including costs incurred, technical measures deployed, and on-going costs.

**Question 3-2**

Has the Company required net metered customers to bear any identified technical system costs when first interconnecting the facilities or on an ongoing basis? Please provide a table of all net metered facilities and costs imposed on customers relating to technical impacts on a per-facility basis.

**Question 3-3**

Has the Company identified any technical operations issues related to the current operations of net metered generation facilities that are imminent or likely? Please provide details.

**Question 3-4**

Has the Company prepared any projections of increasing and incremental technical system costs anticipated to relate primarily or exclusively to the installation and operations of net metered generation facilities? Please provide details of such projections, including all

assumptions used in developing the projections. If the Company has not prepared any such forecasts, please explain why not.

**Question 3-5**

Has the Company ever developed a hosting capacity analysis on any feeder in its system in order to determine the capacity of the feeder to integrate distributed energy resources? Please provide a detailed answer and copies of such analysis. If the Company has not prepared such analyses, please explain why not.

**Question 3-6**

Has the Company evaluated the potential impact of planned grid modernization activities and investments (such as distribution automation and management, distribution system planning, and other activities) on the grid system's ability to interconnect net metering facilities in the future? If so, please provide copies of all such analysis. If no such evaluation has been conducted, please explain why.

**Question 3-7**

- a. What metering and monitoring equipment would be required to obtain a year's worth of statistically valid interval data from net metered customer generators?
- b. What would the estimated cost of such equipment and data collection be?
- c. Has the Company evaluated deployment of such equipment and collection and analysis of such data at any time over the past five years?
- d. If not, why not?
- e. If such evaluation was conducted and the Company decided not to deploy such equipment and collect and analyze data, why did it so decide?

Respectfully submitted,



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Tom FitzGerald  
Kentucky Resources Council  
P.O. Box 1070  
Frankfort, KY 40602  
(502) 551-3675  
[FitzKRC@aol.com](mailto:FitzKRC@aol.com)

*Counsel for Joint Intervenors,  
Mountain Association, Kentuckians  
for the Commonwealth, and  
Kentucky Solar Energy Society*

CERTIFICATE OF SERVICE

This is to certify that the electronic version of the foregoing is a true and accurate copy of the same document that will be filed in paper medium; that the electronic filing has been transmitted to the Commission on May 5, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that in accordance with the March 16, 2020 Commission Order in Case No. 2020-00085 an original and ten copies in paper medium of this *Statement Regarding Receipt of Electronic Transmissions* will not be mailed until after the lifting of the current state of emergency.



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Tom FitzGerald