

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

In the Matter of:

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

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

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to the Joint Intervenors – Mountain Association, Metropolitan Housing Coalition, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society (“MA-MHC-KFTC-KSES”) to be answered

by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 9, 2020.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, MA-MHC-KFTC-KSES, its witnesses, or its counsel.

2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if MA-MHC-KFTC-KSES receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If MA-MHC-KFTC-KSES object to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of MA-MHC-KFTC-KSES, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

James Owen

1. Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all workpapers supporting your testimony, analyses, and conclusions.
2. Was Mr. Owen aware at the time he filed his testimony that the Companies' rate proposals in these proceedings included ECR project eliminations?
3. Please provide all data, including any spreadsheets used with cells unprotected and formulas intact, upon which Mr. Owen relied to calculate the "average median household incomes" in the Companies' service territories shown on pages 11 and 16 of his testimony.

Karl R. Rábago

4. Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all workpapers supporting your testimony, analyses, and conclusions.
5. Provide pdf copies of the following articles or publications listed by Karl R. Rábago in his resume attached as Exhibit 1 to his direct testimony in this proceeding:
 - a. "The Clean Power Plan," Power Engineering Magazine (invited editorial), Vol. 119, Issue 12 (Dec. 2, 2015).
 - b. "The Value of Solar Tariff: Net Metering 2.0," The ICER Chronicle, Ed. 1, p. 46 [International Confederation of Energy Regulators] (December 2013).
 - c. "Socio-Economic and Legal Issues Related to an Evaluation of the Regulatory Structure of the Retail Electric Industry in the State of Colorado," with Thomas E. Feiler, Colorado Public Utilities Commission and Colorado Electricity Advisory Panel (April 1, 1999).
 - d. "Least Cost Electricity for Texas," State Bar of Texas Environmental Law Journal, Vol. 22, p. 93 (1992).
6. Provide pdf copies of the testimonies submitted by Karl R. Rábago in the following regulatory proceedings identified in Exhibit 2 to his direct testimony in this proceeding:
 - a. Jul. 10, 2014, North Carolina Utilities Commission 2014 Avoided Cost Case, North Carolina Utilities Commission Docket # E 1--, Sub 140.
 - b. May 22, 2015, DTE Electric Company Rate Application, Michigan PSC Case # U-17767.

- c. Jan. 22, 2016, Northern Indiana Public Service Company (NIPSCO) Rate Case, Indiana Utility Regulatory Commission Cause No. 44688.
 - d. Jun 2, 2017, Vectren Energy TDSIC Plan, Indiana URC Case No. 44910.
 - e. Jul 28, 2017, Vectren Energy 2016-2017 Energy Efficiency Plan, Indiana URC Case No. 44645.
 - f. Sep 20, 2018, Consumers Energy Company Rate Case, Michigan PSC Case No. U-20134.
 - g. May 10, 2019, NV Energy NV GreenEnergy 2.0 Rider, Nevada PUC, Docket Nos. 18-11015, 18-11016.
 - h. Sep 10, 2019, Interstate Power and Light Company – General Rate Case – Rebuttal, Iowa Utilities Board Docket No. RPU-2019-0001.
 - i. Sep. 18, 2020, Avoided Cost Proceeding for Georgia Power – Direct Testimony, Georgia Public Service Commission Docket No. 4822.
 - j. Sep. 20, 2020, Madison Gas and Electric – General Rate Case – Gas Rates, Wisconsin Public Service Commission Docket no. 3270-UR-123.
7. Please provide a complete list of all embedded cost-of-service studies performed by Mr. Rábago. Include in the response the name of each utility, the jurisdiction, the date the cost-of-service study was performed, the case or docket number in which the study was filed, as applicable.
 8. Please provide a complete list of all marginal cost-of-service studies performed by Mr. Rábago. Include in the response the name of each utility, the jurisdiction, the date the marginal cost-of-service study was performed, the case or docket number in which the study was filed, as applicable.
 9. Please provide a complete list of all benefit-cost studies of DERs performed by Mr. Rábago. Include in the response the name of each utility, the jurisdiction, the date the benefit-cost study was performed, the case or docket number in which the study was filed, as applicable. For each such study, please state the “full range of benefits” included in the study.
 10. Reference page 20 of Mr. Rábago’s testimony. Please explain in detail how the Companies’ proposed NMS-2 constitutes a “take or pay” arrangement.
 11. Reference page 21 of Mr. Rábago’s testimony. Please identify the specific sections or provisions of NMS-2 that require any form of “take or pay.”
 12. Reference page 21 of Mr. Rábago’s testimony. Please explain how NMS-2 is based on “lost revenues.”

13. Reference page 25 of Mr. Rábago's testimony. Provide copies of the pages from Bonbright's Principles of Public Utility Rates that set forth the seven bulleted principles shown on page 25 of Mr. Rábago's testimony.
14. In a Benefit-Cost Analysis of distributed energy resources (DERs), please provide a detailed explanation of the considerations, if any, that should be given to the loss or displacement of coal mining jobs in Kentucky with the implementation of DERs.
15. Referring to page 10, line 7-8 of Mr. Rábago's testimony, please provide all data, analysis, and workpapers supporting the statement that "operation of distributed generations...results in occasional exports..." Please provide your definition of "occasional."
16. The Companies own and operate, and have contracted for the output of, several solar facilities, as well as other renewable generating facilities. Should the Commission permit the Companies to collect from customers the Value of Solar (or other comparable measures of benefits for other renewable generating facilities) in excess of the Companies' costs for such facilities? If not, why not?
17. Provide a detailed list of and estimate in cents per kWh for each long-term value provided by customer-generators on KU and LG&E's systems for the energy they flow to the grid. Also, provide a detailed description of each value provided by customer-generator, as well as all workpapers supporting the dollar estimate of the value in cents per kWh.
18. Referring to page 14 lines 19-21 of Mr. Rábago's testimony, you state that the net billing approach "greatly increases the amount of electricity that is considered excess to the customer's use." Is it not the case that when the customer-generator is, at any moment in time, producing more electricity than they are consuming that such electricity is, in fact, excess? Please explain your answer.
19. Please reconcile your statement on page 15, lines 8-9 that a "customer's return on investment is dramatically affected by the compensation rate paid by the utility" with your statement on page 9, lines 12-13 that "exports are incidental to an investment objective of managing energy costs." Isn't it true that the compensation rate is not "paid by the utility" but by its customers who use the excess energy of the customer-generator? Please explain your response.
20. Referring to page 15, lines 14-15 of Mr. Rábago's testimony, why should a customer-generator be allowed to "use self-generation to offset consumption during any time in the billing period?" Isn't such an ability really a "banking" or "storage" service being provided by the utility? If so, should the customer-generator be charged for such service much as a gas pipeline charges for storage to help the customer address daily imbalances? If you do not consider this a banking or storage service, please explain why this is the case.
21. Referring to page 27, lines 7-10 of Mr. Rábago's testimony, please explain how the SQF rate that will be paid to customer-generators for excess electricity they push

onto the grid is linked to “volatile wholesale energy prices.” Please provide all reports, analysis, and workpapers that support your response.

22. Referring to page 33, lines 8-21 of Mr. Rábago’s testimony, please explain how excess energy from net metered customers can be “properly planned...by the utility.”

MHC / Cathy Kuhn (#2020-00350)

23. Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all workpapers supporting your testimony, analyses, and conclusions.

Dated: March 19, 2021

Respectfully submitted,




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CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Kentucky Utilities Company's and Louisville Gas and Electric Company's March 19, 2021 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 19, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a true and correct copy in paper medium will be delivered to the Commission within 30 days of the lifting of the State of Emergency.



Kenneth R. Niess
Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company