

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 SUPPLEMENTAL 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 June 30, 2021.

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.

Supplemental Data Requests

1. Please provide a copy of each IRS Form 990 filed by each of the Joint Intervenors, if any, for tax years 2018, 2019, and 2020.

James Owen

2. Mr. Owen's testimony states at page 3 lines 4-5, "Thus, it is in the Commission's discretion to determine what rate will provide the Company with all of its fixed and demand-based costs."
 - a. Does Mr. Owen understand that the rate the Commission ultimately approves for Rider NMS-2 for each of the Companies will be only to compensate for energy supplied to the grid by new net metering customers?
 - b. Does Mr. Owen further understand that all customers, not the Companies, will ultimately pay for such energy supplied to the grid?
3. Mr. Owen's testimony addresses "Value of Solar" studies, reports, and meta-analyses.¹
 - a. Is it Mr. Owen's view that the Companies' customers should be required to pay the full Value of Solar under NMS-2?
 - b. If similar benefits as those Mr. Owen believes net metering customers provide could be obtained for a lower price, should that factor into formulating NMS-2 rates? Or should the Companies' customers be required to pay the full Value of Solar irrespective of market prices for solar energy and truly avoided utility costs?
4. See Mr. Owen's supplemental testimony at page 9, lines 12-16. Please provide all data in Mr. Owen's possession showing any evidentiary link between the "default values and range of values contained in the Hayibo and Pearce study" and the Companies' avoidable costs of providing service to their customers.

Karl R. Rábago

5. Based on the Minnesota VOS Methodology and the analysis of US VOS methodologies conducted by Hayibo and Pearce, Mr. Rábago recommends adding a number of components to the Commission's prescribed net metering compensation framework in Kentucky Power Company's recent rate case.²
 - a. Please confirm that Mr. Rábago testified in Kentucky Power Company's recent rate case.

¹ See, e.g., Owen Supplemental Testimony at 6 In. 4-7.

² Rábago Supplemental Testimony at 3-5.

- b. Please confirm that Mr. Rábago testified concerning the Minnesota VOS Methodology and the analysis of US VOS methodologies conducted by Hayibo and Pearce in Kentucky Power Company's recent rate case.
 - c. Please confirm that, notwithstanding Mr. Rábago's testimony, the Commission chose to create a net metering compensation framework in Kentucky Power Company's recent rate case that did not include the components Mr. Rábago desires the Commission to include now.
 - d. Please confirm that, were the Commission to add new components to the net metering compensation framework it created less than three months ago—during the pendency of this proceeding—it would do so contrary to Mr. Rábago's testimony that ““while calculated values will differ from one utility to the next, the approach used to calculate the benefits and costs of distributed solar generation should be uniform.””³
6. See Mr. Rábago's supplemental testimony at page 9, lines 4-10. Please provide all data in Mr. Rábago's possession showing any evidentiary link between the values contained in the Hayibo and Pearce study and the Companies' avoidable costs of providing service to their customers.

³ Rábago Supplemental Testimony at 6, lines 10-11.

Dated: July 22, 2021

Respectfully submitted,




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and Louisville Gas and Electric Company*

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 July 22, 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 July 22, 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