

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 SURCREDIT)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
MOUNTAIN ASSOCIATION,
KENTUCKIANS FOR THE COMMONWEALTH, AND
KENTUCKY SOLAR ENERGY SOCIETY'S
SECOND SET OF DATA REQUESTS
DATED FEBRUARY 5, 2021

FILED: FEBRUARY 19, 2021

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Chief Operating Officer for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 10th day of February 2021.



Notary Public

Notary Public ID No. 603967

My Commission Expires:

July 11, 2022


VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Eileen L. Saunders**, being duly sworn, deposes and says that she is Vice President, Customer Services for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.


_____ **Eileen L. Saunders**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 17th day of February 2021.


_____ **Notary Public**
Notary Public ID No. 603967

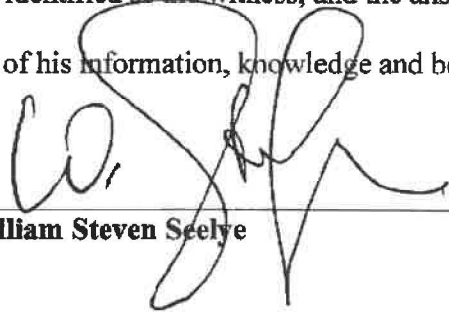
My Commission Expires:

July 11, 2022

VERIFICATION

STATE OF NORTH CAROLINA)
)
COUNTY OF BUNCOMBE)

The undersigned, **William Steven Seelye**, being duly sworn, deposes and states that he is a Principal of The Prime Group, LLC, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



William Steven Seelye

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 17th day of February _____, 2021.

Kyle Mello
NOTARY PUBLIC
BUNCOMBE COUNTY, NC
MY COMMISSION EXPIRES 7/29/2023



Notary Public (SEAL)

Notary Public ID No. 20182306096

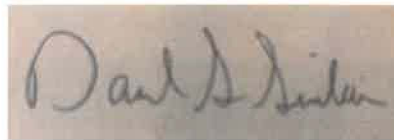
My Commission Expires:

7/29/2023

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **David S. Sinclair**, being duly sworn, deposes and says that he is Vice President, Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



David S. Sinclair

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 16th day of February 2021.



Notary Public

Notary Public, ID No. **603967**

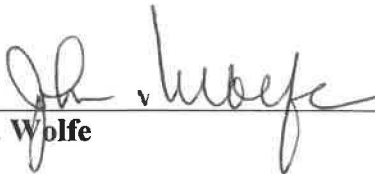
My Commission Expires:

July 11, 2022

VERIFICATION


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **John K. Wolfe**, being duly sworn, deposes and says that he is Vice President, Electric Distribution for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



John K. Wolfe

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 17th day of February 2021.



Notary Public
Notary Public ID No. 603967

My Commission Expires:
July 11, 2022

KENTUCKY UTILITIES COMPANY

**Response to Mountain Association, Kentuckians for the Commonwealth,
and Kentucky Solar Energy Society's Second Set of Data Requests
Dated February 5, 2021**

Case No. 2020-00349

Question No. 1

Responding Witness: Daniel K. Arbough / Eileen L. Saunders

Q-1.

- a. Please provide 2019, 2020 and YTD data for the number of people who are eligible for electric disconnection by address and census tract.
- b. Please provide 2019, 2020 and YTD data on the number of people who are late in their electric payments by address and census tract.
- c. Please provide 2019, 2020 and YTD data on the average amount owed on past due bills by address and census tract.
- d. Please provide 2019, 2020 and YTD data on the number of people who have a signed repayment plan by address and census tract.
- e. Please provide current data on the number of people who are late in their payments, but do not have a signed payment plan in place by address and census tract.
- f. Please provide current data on the number of people who have a signed payment plan who are current on that payment plan by address and census tract.
- g. Please provide current data on the number of people who have a signed payment plan who have missed one or more payments by address and census tract.
- h. Are the people who have missed one or more payments on their payment plan included in the overall number of people who are currently eligible for disconnection?
- i. Please provide information and data regarding the mean and median number of months customers are behind on payments both in the aggregate and by census tract.

- j. Please provide information and data regarding the number of accounts and the average bill amount due for those that are 2 months behind on payments, 3 months behind on payments, 6 months behind on payments, and 9 months behind on payments.
- k. Please describe your practices for when someone falls behind on a payment plan. If they miss one payment, are they immediately eligible for disconnection?
- l. Please provide data on the number of electric meters by census tract.
- m. Please provide data on costs associated with damages and repairs to infrastructure by census tract.
- n. What amount of funds that you are seeking in this case, are allocated toward capital expenditures?

A-1.

The Company does not maintain census tract data in its records. Customer address is considered private customer information. For these reasons census tract and address cannot be provided. Additionally, the Company does not maintain records or information in the manner requested for many sub-parts below. The following represents the Company's best effort to be responsive to the requests.

- a. See attached.
- b. Number of residential customers late in their payments (past due customers).

Year	Customers Late in Their Payments (Past Due Customers)
2019	807,216
2020	798,244

- c. Average residential amount owed on past due bills.

Year	Average Residential Amounts Owed
2019	\$115.24
2020	\$147.17

- d. Number of residential signed payment plans. Signed payment plans includes all payment plans that are 30 days or more.

Year	Signed Payment Plans
2019	3,399
2020	36,274
January 2021	3,574

- e. For the 30 days ending February 8, 2021, there were 58,137 unique residential customers who were late on their payments, but not on a signed payment plan. This number includes 3,944 customers who are on shorter term payment plans and those that have paid their past due amounts after their bill due date past. Customers late on their payments does not include customers who were previously set up on a signed payment plan and have maintained payments.
- f. There are 16,604 residential customers on signed payment plans as of February 9, 2021.
- g. Typically, when customer misses one payment, the plan is removed and the entire balance is due.
- h. Yes. When a customer falls behind on a payment plan, the payment plan is removed and the customer is provided the opportunity to pay the full amount. A disconnection notice providing 10 additional business days to pay or contact the Company is sent to the customer prior to disconnection.
- i. Mean and median number of months for past due residential customers.

Year	Mean	Median
2019	2	2
2020	3	2

- j. Number of residential accounts and amounts for specific number of months past due.

Year	2 Months	Average Amount	3 Months	Average Amount	6 Months	Average Amount	9 Months	Average Amount
2019	42,347	\$114	11,814	\$203	331	\$469	38	\$466
2020	35,086	\$123	15,253	\$240	2,043	\$574	601	\$767

- k. See response to h above.
- l. The number of residential electric meters at February 6, 2021, are 440,420.
- m. The Company does not track costs associated with damages and repairs to infrastructure by census tract.
- n. The drivers of the rate case are discussed at pages 20-23 of Mr. Blake’s testimony, which include investments in the facilities to provide safe, reliable service to customers.

Kentucky Utilities
January 2019 through December 2020

Residential Customers Eligible for Disconnection

<u>Year</u>	<u>Annually</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>
2019	133,243	9,878	9,772	10,598	12,272	10,984	10,061	11,209	13,458	13,400	13,690	8,757	9,164
2020	269,013	9,602	10,248	17,895	27,279	21,539	22,974	24,149	29,804	31,936	30,288	23,678	19,621

*Moratorium on disconnections March 16, 2020 through October 20, 2020. Residential disconnections remain suspended.

KENTUCKY UTILITIES COMPANY

**Response to Mountain Association, Kentuckians for the Commonwealth,
and Kentucky Solar Energy Society's Second Set of Data Requests
Dated February 5, 2021**

Case No. 2020-00349

Question No. 2

**Responding Witness: Robert M. Conroy / Eileen L. Saunders /
William Steven Seelye**

- Q-2. Regarding late fees included in the KU proposed tariff:
- a. What is the amount of the proposed late fee?
 - b. What is the basis for the amount of fee, i.e. is it calculated based on a percentage of the arrearage, on the lost value of the late payment, or other basis?
 - c. What is the rationale for imposition of a late fee in residential customers?
 - d. Please provide any empirical evidence for the proposition that a late fee on KU residential customers results in more on-time payments.
 - e. Please provide the number and percentage of residential customers, other than customers using LIHEAP dollars, who were late in a monthly payment in the six months before the suspension of the utility's ability to impose late fees under PSC Case No. 2020-085.
 - f. Please provide the number and percentage of residential customers, other than customers using LIHEAP dollars, who were late in a monthly payment in the six months after the suspension of the utility's ability to impose late fees under PSC Case No. 2020-085.
 - g. Is KU aware that in order to access LIHEAP crisis monies for utility bill assistance, the eligible ratepayer must be late in paying their bill?
 - h. If so, please explain why the utility assesses late fees in such cases, and whether it waives such fees for LIHEAP-eligible ratepayers.

A-2.

- a. The Company is not proposing a change in its late payment charge in this proceeding. For Rates RS, VFD, GS, a late payment charge of 3% is assessed on monthly charges.

Residential customers who receive a pledge for or notice of low-income energy assistance from an authorized agency are not assessed a late payment charge for the bill for which the pledge or notice is received, nor are they assessed a late payment charge in any of the 11 months following receipt of such pledge or notice.

In addition, residential customers in good standing who have not been assessed a Late Payment Charge for the previous 11 months have the option of waiving one late payment charge upon request. This option may only be used once every 12 months as long as the customer remains in good standing.

For large power customers taking service under Rates PS, TODS, TODP, RTS, and FLS, a late payment charge of 1% is assessed on monthly charges.

- b. The late payment charge is applied as a percentage of the current bill. See response to part a.

KU reduced the late payment charge from 5% to the current level of 3% for Rates RS and GS in the Settlement Agreement that was filed with the Commission on November 19, 2012 in Case No. 2012-00221. The Settlement Agreement was approved by the Commission in its Order dated December 20, 2012. No cost support was developed at that time nor since to support the settled rate. Ultimately, the late payment charge is intended to be an inducement to encourage customers to pay their bills on time. See response to PSC 2-132.

- c. The purpose of the late payment charge is to encourage customers to pay their bills on time. See the response to PSC 2-132.

The Company believes that it is important to retain late payment fees to encourage customers to pay their bills on time. Late payment charges are an essential element of any modern working capital management system. Late payment charges are designed to reduce the payment lag by customers and thereby reduce a business's cash working capital requirements for receivables.

Late payment fees are a common business practice and ubiquitous. Most service providers -- such as banks, rental property owners, credit card companies, shipping companies, cellular telephone companies, attorneys, medical doctors, hospitals, universities -- apply late payment fees. For example, the University of Kentucky and University of Louisville both charge

late payment fees for tuition and other student payments. Rental property owners in Kentucky are allowed to assess late payment fees. KRS 359.215 allows rental property owners in Kentucky to charge a late payment fee of \$20 or 20% on past due rental payments.

State government agencies impose late payment charges. For example, the Kentucky Department of Revenue applies a late payment penalty of up to 20 percent on past due state tax and revenue payments. The Kentucky Public Service Commission's assessment fees are subject to late payment fees. On the invoice for the PSC assessment that all utilities must pay by July 1 of each year, it states, "Penalties provided per KRS 278.990(3) include \$1,000, plus \$25 per day for each day the assessment remains unpaid. . . . plus a 25% collection fee."

Federal government agencies impose late payment charges. The United States Internal Revenue Service charges a late payment fee of 5 percent per month on late tax payments. In its guide, *Managing Federal Receivables* (2015), United States Bureau of Fiscal Services states that late charges are to be applied to all receivables managed by the Bureau that include the following categories: (1) interest which compensates the federal government for loss of use of funds, (2) penalties of up to 6% per year, and (3) administrative costs.

Clearly, most businesses and government revenue collection agencies have concluded that assessing late payment charges is an effective tool for managing cash working capital.

For many years, the Commission has recognized the important role late payment charges have on a utility's cash flow and impact on residential rates if the late payment penalty was eliminated. In its Order on Rehearing in Case No. 10064, the Commission stated:

The prompt payment provision [late payment charge] in LG&E's tariffs operates as an incentive to encourage customers to timely pay their bills. Prompt payment of bills is essential to LG&E's cash flow. Approximately 90 percent of LG&E's customer pay their bills on time and thereby avoid forfeiting the discount. If the discount was eliminated, the rates for all residential customers would have to be increased by almost \$3 million to offset the forfeited discount revenues.¹

¹ *Adjustment of Gas and Electric Rates of Louisville Gas and Electric Company*, Case No. 10064, Order at 32 (Ky. PSC Apr. 20, 1989).

Observing that LG&E’s late payment charge had been in its tariffs for many years, the Commission again found that “the late payment charge serves as an incentive and has an important role in LG&E’s bill collection strategy.”²

In the current proceedings for KU and its sister utility LG&E, if the late payment charge were eliminated, then base rates for all residential customers would need to increase by the following amounts:

Company	Late Payment Revenue That Would Be Shifted to All Residential Customers if the Late Payment Charge Were Eliminated
KU	\$3,870,525
LG&E - Electric	\$2,706,693
LG&E - Gas	\$1,097,667
Total	\$7,674,885

In total, the elimination of late payment charges would result in a transfer of \$7,674,885 from KU and LG&E’s residential customers who make late payments to all residential customers.

The Companies believe that if the late payment fee were eliminated, more and more customers would delay paying their bills on time as they learned about the change in policy.

Prior to the COVID-19 pandemic, 86% of KU’s residential customers and 86% of LG&E’s customers did not receive a late payment charge during the year. Therefore, if the late payment charge were eliminated for residential customers, a significant amount of revenue requirement would be shifted from late payers to the majority of residential customers who pay their bills on time.

Without late payment fees, or some other comparable mechanism, the Companies are concerned that the delay in bill payments will increase on average, thus increasing the Companies’ cash working capital requirements. It is important to recognize that cash working capital does not correspond to

² *Adjustment of Gas and Electric Rates of Louisville Gas and Electric Company*, Case No, 1990-00158, Order at 73 (Ky. PSC Dec. 21, 1990).

the amount of cash or cash reserves that a utility has available. Cash working capital is the capital investment that the utility’s investors must invest into the organization to operate its business activities. In a regulated utility environment, cash working capital is included as a component of a utility’s rate base and is an investment into the business that is no different from brick-and-mortar investments. Therefore, for purposes of determining a utility’s revenue requirements, increases in cash working capital increase the utility’s total rate base or capitalization, to which the utility’s weighted cost of capital, grossed up for income taxes, is applied.

A late paying customer currently has ten business days after a late payment charge is assessed before service is disconnected. Without a late payment charge, if customers delay making payments, then the average payment delay could add 14 additional calendar days to the Company’s collection cycle. The following table shows the increase in KU’s and LG&E’s cash working capital for a 1 to 14 calendar day delay in the bill payment by customers:

Delay in Days in the Average Bill Payment by Customers (Collection Lag)	Increased Cash Working Capital			
	KU	LG&E Electric	LG&E Gas	Total
1	\$ 4,291,415	\$ 2,937,440	\$ 882,017	\$ 8,110,872
2	\$ 8,582,854	\$ 5,874,879	\$ 1,764,034	\$ 16,221,767
3	\$ 12,874,316	\$ 8,812,319	\$ 2,646,051	\$ 24,332,687
4	\$ 17,165,803	\$ 11,749,758	\$ 3,528,068	\$ 32,443,630
5	\$ 21,457,313	\$ 14,687,198	\$ 4,410,085	\$ 40,554,597
6	\$ 25,748,848	\$ 17,624,638	\$ 5,292,103	\$ 48,665,588
7	\$ 30,040,405	\$ 20,562,077	\$ 6,174,120	\$ 56,776,602
8	\$ 34,331,987	\$ 23,499,517	\$ 7,056,137	\$ 64,887,640
9	\$ 38,623,592	\$ 26,436,956	\$ 7,938,154	\$ 72,998,702
10	\$ 42,915,220	\$ 29,374,396	\$ 8,820,171	\$ 81,109,787
11	\$ 47,206,872	\$ 32,311,836	\$ 9,702,188	\$ 89,220,896
12	\$ 51,498,548	\$ 35,249,275	\$ 10,584,205	\$ 97,332,028
13	\$ 55,790,247	\$ 38,186,715	\$ 11,466,222	\$ 105,443,184
14	\$ 60,081,969	\$ 41,124,154	\$ 12,348,239	\$ 113,554,363

The Companies are concerned that eliminating late payment charges will encourage customers to delay paying their bills. This is supported by the sharp rise in late payments that the Companies experienced after the Commission implemented its moratorium on late payment charges due to the COVID-19 pandemic. See responses to parts d, e, and f, below.

Furthermore, the Company’s 3% late payment charge for residential customers is slightly less than the actual cost of processing customer late

payments. For KU, as calculated in the following table, the marginal out-of-pocket expense of printing and mailing late notices and of deploying credit processes to collect late payments corresponds to a cost of \$4.60 per late payment, whereas the average late payment charge per residential customer is only \$4.14:

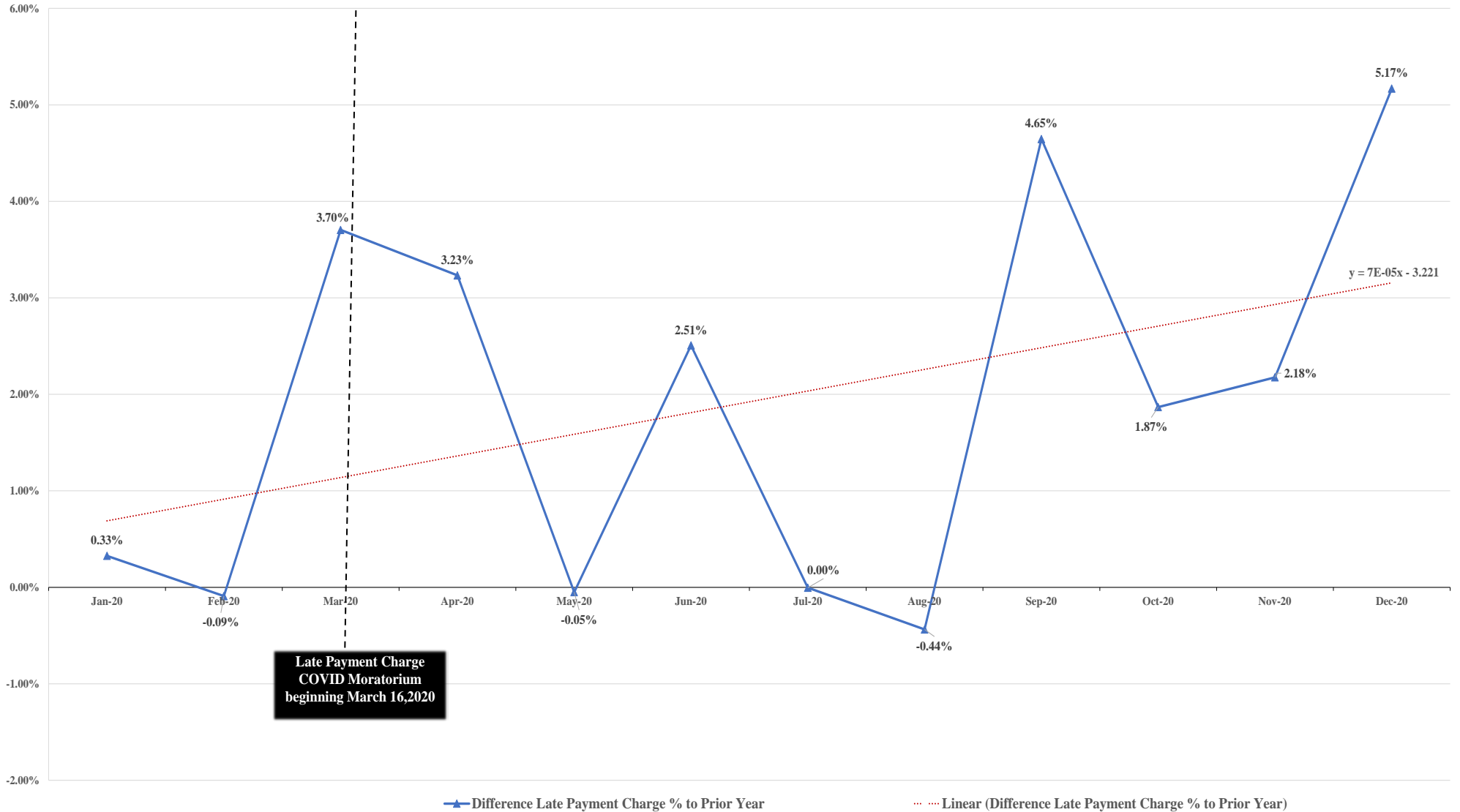
AVERAGE COST PER LATE PAYER - KU		AVERAGE LATE FEE REVENUES - KU		Total
Print cost - termination notice	\$0.17	2019 LPC Revenues		\$3,083,168
Postage - termination notice	\$0.41	2019 LPCs Assessed		744,216
Customer contact	\$4.02			
Average Cost Per LPC	\$4.60	Average Revenue Per LPC		\$4.14

It is important to note, however, that the above marginal out-of-pocket expenses does not include the marginal impact on cash working capital incurred as a result of a late payment, as addressed above. Consequently, the total cost of a late payment is higher than the 3% late payment charge currently assessed by the Company. The current 3% late payment charge fails to recover the Company’s marginal out-of-pocket expenses related to processing late payments.

- d. From March 16, 2020 through December 31, 2020, late payment charges (LPCs) were assessed and waived on customer accounts, never showing on the bill. In other words, KU tracked the number of customers who would have been assessed a late payment fee on their bill. The annual average number of LPCs assessed in 2020 were 2% higher than the prior year, see attached. If late payment charges were eliminated, a permanent rise in the number of late payers is anticipated as customers begin to understand there is no longer a penalty for late payment.
- e. From September 1, 2019 through February 29, 2020, there were 367,404 residential customers who were assessed a late payment charge. This figure accounts for 14% of total residential customers.
- f. From March 1, 2020 through September 30, 2020, there were 498,070 residential customers who would have been assessed a late payment charge had the moratorium not been in effect. This figure accounts for 16% of total residential customers.
- g. Yes.
- h. As stated in response to part a, residential customers who receive a pledge of low income assistance from an authorized agency are not assessed or required to pay a late payment charge for the bill for which the pledge is received, nor are they assessed or required to pay a late payment charge in any for the eleven months following receipt of such pledge.

Kentucky Utilities Company

2020 Percent of Customers Assessed a Late Payment Charge Compared to 2019



KENTUCKY UTILITIES COMPANY

**Response to Mountain Association, Kentuckians for the Commonwealth,
and Kentucky Solar Energy Society’s Second Set of Data Requests
Dated February 5, 2021**

Case No. 2020-00349

Question No. 3

Responding Witness: John K. Wolfe

Q-3. The response to MA-KFTC-KSES DR1Q 1-48, states “the cost of distribution facilities in dense neighborhoods is often higher because the facilities often utilize underground distribution facilities in dense neighborhoods, which are often more costly” Please provide the list of neighborhoods which have underground distribution facilities. Please provide a breakdown of expenses associated with underground facilities vs above-ground facilities.

A-3. KU does not have a business reason to track neighborhood names with underground distribution facilities. KU has some subdivision names identified in the Geographical Information System (GIS) with underground facilities. See attached.

KU does not track expenses by neighborhood. See the table below for a breakdown of expenses associated with underground facilities vs. above-ground facilities in total for the test year (\$000s).

Overhead	
Labor	7,559
Outside Services	2,402
Materials	1,912
Transportation	2,742
Other	514
Total	15,131

Underground	
Labor	350
Outside Services	144
Materials	43
Transportation	117
Other	(17)
Total	637

Name	Zip	Service Territory
BEDROCK MANOR PH 1	40004	KU
BIG SPRING ESTATES PH 3 C	40004	KU
BIG SPRINGS ESTATES PH III-A	40004	KU
BIG SPRINGS ESTATES PH III-B	40004	KU
CASTLE COVE	40004	KU
PEMBROOKE PLACE PH 1	40004	KU
POPLAR WOOD ESTATES	40004	KU
ROWAN CREEK	40004	KU
WOODLAWN SPRINGS PH 1	40004	KU
WOODLAWN SPRINGS PH 10	40004	KU
WOODLAWN SPRINGS PH 2	40004	KU
WOODLAWN SPRINGS PH 3	40004	KU
WOODLAWN SPRINGS PH 5	40004	KU
WOODLAWN SPRINGS PH 7-A	40004	KU
WOODLAWN SPRINGS PH 7-B	40004	KU
WOODLAWN SPRINGS PH 8	40004	KU
WOODLAWN SPRINGS PH 9, 9A & 9B	40004	KU
H.C. MORGAN SUBDIVISION	40006	KU
HICKORY GROVE	40006	KU
PALMYRA ESTATES	40006	KU
RAMBLING ACRES	40006	KU
BLAZER HEIGHTS PH 2	40008	KU
BLAZER HEIGHTS PH 7	40008	KU
BLAZIER HEIGHTS SEC 5	40008	KU
CORNELL AGRICULTURAL DIVISION #2	40008	KU
THE MEADOWS OF BLOOMFIELD	40008	KU
BALLARD WOODS SEC 1	40014	KU
BALLARD WOODS SEC 2	40014	KU
BALLARD WOODS SEC 3	40014	KU
BALLARD WOODS SEC 4	40014	KU
CLARKE POINTE SEC 1	40014	KU
CLARKE POINTE SEC 2	40014	KU
CLARKE POINTE SEC 3	40014	KU
CLARKE POINTE SEC 4	40014	KU
CLARKE POINTE SEC 5	40014	KU
GRAND DELL	40014	KU
LOST VALLEY ESTATES SEC 1	40014	KU
MOODY HEIGHTS	40014	KU
ROJAC FARM, LLC	40014	KU
THE VILLAGES OF BALLARD GLEN 1	40014	KU
ARBOR VIEW ESTATES	40019	KU
ELMCREST VILLAGE SEC 1	40019	KU
ELMCREST VILLAGE SEC 2	40019	KU
QUAIL RUN	40019	KU
EQUESTRIAN LAKES NORTH	40022	KU
FAIRFIELD ESTATES	40022	KU
ARTISAN PARK SEC 1	40031	KU
ARTISAN PARK SEC 2	40031	KU
ASHWOOD VILLAS	40031	KU
C & W PARK	40031	KU
CEDAR SPRINGS SEC 1	40031	KU
CEDAR SPRINGS SEC 2	40031	KU
CEDAR SPRINGS SEC 3	40031	KU
CEDAR SPRINGS SEC 4	40031	KU
CHERRY GLEN SEC 1	40031	KU
CHERRYWOOD PLACE SEC 3A-1	40031	KU
CHERRYWOOD PLACE SEC 3A-2	40031	KU
CHERRYWOOD PLACE SEC 3B	40031	KU
CHERRYWOOD PLACE SEC 4	40031	KU

CHERRYWOOD PLACE SEC 5A	40031	KU
CHERRYWOOD PLACE SEC 5B	40031	KU
CHERRYWOOD PLACE SEC 6	40031	KU
CHERRYWOOD SEC 1	40031	KU
CHERRYWOOD SEC 2A	40031	KU
CHERRYWOOD SEC 2B	40031	KU
EAGLES LANDING	40031	KU
FALCON RIDGE SEC 1	40031	KU
FALCON RIDGE SEC 2	40031	KU
FALCON RIDGE SEC 2	40031	KU
LAGRANGE COMMERCE CENTER	40031	KU
LAGRANGE TOWNHOUSES	40031	KU
MAJESTIC WOODS SEC 1	40031	KU
MAJESTIC WOODS SEC 2	40031	KU
MAPLE GROVE FARMS SEC 2	40031	KU
MHP, COPPERSTONE POINTE	40031	KU
MILESTONE VILLAGE	40031	KU
OAK LEAF TERRACE	40031	KU
OLD ANITA SPRINGS	40031	KU
OLDHAM COUNTY HEALTH DEPT.	40031	KU
OLDHAM OAKS APARTMENTS	40031	KU
OLDHAM WOODS SEC 1-C	40031	KU
OLDHAM WOODS SEC 2-A	40031	KU
PARK VIEW MANOR	40031	KU
PRESTWICK ESTATES SEC 1	40031	KU
PRESTWICK ESTATES SEC 2	40031	KU
PRISTINE POINTE	40031	KU
RAVENWOOD GLEN CONDOMINIUMS	40031	KU
SPRING HOUSE CONDOMINIUMS	40031	KU
SPRINGHOUSE ESTATES SEC 1	40031	KU
SPRINGHOUSE ESTATES SEC 2	40031	KU
SPRINGHOUSE ESTATES SEC 3	40031	KU
SPRINGHOUSE ESTATES SEC 4	40031	KU
SPRINGHOUSE ESTATES SEC 5	40031	KU
SUMMIT PARKS SEC 1A	40031	KU
THE RESERVE AT L'ESPRIT SEC 2	40031	KU
THE VILLAGES OF BALLARD GLEN 2	40031	KU
WASHINGTON MANOR	40031	KU
WOODFIELD APARTMENTS	40031	KU
WOODLAND LAKE SEC 2	40031	KU
WOODLAND LAKE SEC 3	40031	KU
WOODLAND LAKE SEC 4	40031	KU
WOODLAND LAKE SEC 5	40031	KU
WOODRIDGE ESTATES SEC 1	40031	KU
WOODRIDGE ESTATES SEC 2	40031	KU
HIGHLAND PARK PH 1 & 2	40033	KU
HIGHLAND PARK PH 3	40033	KU
WM&A DIV 2	40033	KU
PINE VIEW	40037	KU
HENRY COUNTY PARK	40050	KU
KIRKPATRICK HEIGHTS	40051	KU
BAKER DRIVE TOWNHOUSES	40065	KU
BENSON TRACE SEC 1	40065	KU
BIAGI FARM	40065	KU
BRASSFIELD SECTION 3	40065	KU
BRIDLEWOOD ESTATES SEC 1	40065	KU
BRIDLEWOOD ESTATES SEC 2	40065	KU
BRIDLEWOOD ESTATES SEC 3	40065	KU
CARRINGTON PLACE PHASE 1	40065	KU
CATALPAGREEN SEC 11	40065	KU
CHARLESTON	40065	KU

CITADEL CONSTRUCTION	40065	KU
CLOVERBROOK FARMS PH 1 SEC 1	40065	KU
CLOVERBROOK FARMS PH 1 SEC 2	40065	KU
CLOVERBROOK FARMS SEC 3	40065	KU
CLOVERBROOK FARMS SEC 3 SH 2	40065	KU
CLOVERBROOK FARMS SEC 5	40065	KU
CLOVERBROOK FARMS SEC 6	40065	KU
CLOVERBROOK FARMS SEC 7	40065	KU
CLOVERBROOK FARMS SEC 8 PH 1	40065	KU
CLOVERBROOK FARMS SEC 8 PH 2	40065	KU
CLOVERBROOK FARMS SEC 9 PH 1	40065	KU
CLOVERBROOK FARMS SEC 9 PH 2	40065	KU
CLOVERBROOK SEC 4	40065	KU
COMMERCE CROSSING	40065	KU
COUNTRY MANOR	40065	KU
CREEKSIDE VILLAGE PH 2 (SHELBY)	40065	KU
DALE ESTATES	40065	KU
DOGWOOD TRACE	40065	KU
DOGWOOD TRACE PH 5	40065	KU
DONOVAN PROPERTY DIVIDED	40065	KU
FAIRWAY CROSSING	40065	KU
FAIRWAY CROSSING SEC 2	40065	KU
FAIRWAY CROSSING SEC 3	40065	KU
FAIRWAY CROSSING SEC 4	40065	KU
FARMING MEADOWS	40065	KU
FARMING MEADOWS 2	40065	KU
FOXWOOD ESTATES	40065	KU
GREAT ESCAPES CINEMAS	40065	KU
HAVEN HILL APARTMENTS	40065	KU
HI POINT INDUSTRIAL PARK SEC 1	40065	KU
HI POINT SHOPPING CENTER PH 2	40065	KU
HIRSCH FARM EAST DIVIDED	40065	KU
KNOB VIEW ESTATES	40065	KU
MAIDIE LANE	40065	KU
MEADOW GLEN SEC 1	40065	KU
MEADOW GLEN SEC 2	40065	KU
MEADOW GLEN SEC 3	40065	KU
MEADOWBROOK SEC 3 PH 1	40065	KU
MEADOWBROOKE SEC 3 PH 2	40065	KU
MEADOWBROOKE SEC 3 PH 3	40065	KU
MIDDLETON HEIGHTS	40065	KU
MIDLAND ESTATES SEC 6	40065	KU
MIDLAND ESTATES SEC 7	40065	KU
MIDLAND ESTATES SEC 8	40065	KU
MIDLAND ESTATES SEC 9	40065	KU
MULBERRY HEIGHTS	40065	KU
NORTH COUNTRY SEC 4 PH 1	40065	KU
PARKPLACE PH2	40065	KU
PAYTON PLACE	40065	KU
PHEASANT GLEN PH 1	40065	KU
ROBIN PLACE SUBDIVISION	40065	KU
SILVER CREEK (SHELBYVILLE)	40065	KU
SOUTHSHORES SUBDIVISION	40065	KU
STONECREST BUSINESS PARK LOT 14	40065	KU
STONECREST BUSINESS PARK LOT 16	40065	KU
STONECREST INDUSTRIAL PROPERTY	40065	KU
SUMMERSFIELD PLACE PH 1	40065	KU
SUMMERSFIELD PLACE PH 2	40065	KU
SUMMERSFIELD PLACE SEC 1	40065	KU
SUNNY MEADOWS (SHELBYVILLE)	40065	KU
THE ESTATES OF OSPREY COVE SEC 2	40065	KU

THE ESTATES OF OSPREY COVE SEC 3	40065	KU
THE ESTATES OF OSPREY COVE SEC 4	40065	KU
THE ESTATES OF OSPREY COVE SEC 5	40065	KU
THE ESTATES OF OSPREY COVE SEC 6	40065	KU
THE HARBORAGE	40065	KU
THE VILLAGE AT NORTHRIDGE SEC1	40065	KU
THE VILLAS OF FAIRWAY CROSSING	40065	KU
THE VISTAS OF JEPHTHA KNOB	40065	KU
TOWN AND COUNTRY SECTION 9	40065	KU
TOWN N COUNTRY SEC 11	40065	KU
BRAXTON ESTATES	40067	KU
CARDINAL CLUB ESTATES	40067	KU
CARDINAL CLUB ESTATES CONDO PH 1	40067	KU
CARDINAL CLUB ESTATES PH 2	40067	KU
CARDINAL CLUB ESTATES PH 3	40067	KU
CARDINAL CLUB ESTATES PH 4	40067	KU
CARDINAL OAKS PATIO HOMES	40067	KU
KINGBROOK COMMERCE PARK SEC 1	40067	KU
KINGBROOK COMMERCE PARK SEC 3	40067	KU
LANDSPUR HILL	40067	KU
MAJESTIC OAKS SEC 3	40067	KU
MAJESTIC OAKS SEC 4	40067	KU
PINE MEADOWS	40067	KU
ROLLING RIDGE PH 3B	40067	KU
ROLLING RIDGE PH 4 SEC 1	40067	KU
ROLLING RIDGE PH 5 SEC 1	40067	KU
SIMPONSVILLE BUSINESS CENTER	40067	KU
STATION POINTE SEC 1	40067	KU
THE RESERVES AT TODDS STATION	40067	KU
THRELKELD PROPERTY	40067	KU
TODD STATION PH 1	40067	KU
TODDS STATION PH 2	40067	KU
WESTVIEW ESTATES	40067	KU
ELIZABETH PARK DEV	40069	KU
SADDLEBROOK PH 1	40069	KU
SHALIMAR	40069	KU
WALNUT RIDGE	40069	KU
BUCK CREEK FARMS	40071	KU
CAMP BRANCH TRAIL	40071	KU
CEDAR SPRINGS FINAL	40071	KU
CHESAPEAKE MEADOWS	40071	KU
ELK CREEK RIDGE	40071	KU
HERITAGE HILLS SEC 1	40071	KU
HERITAGE HILLS SEC 2 #2	40071	KU
PERFECT LANDING	40071	KU
SYCAMORE SUMMIT	40071	KU
TOP FLIGHT LANDING PH 1A	40071	KU
WATKINS GLEN PH 1	40071	KU
WATKINS GLEN PH 2A	40071	KU
WATKINS GLEN PH 2B	40071	KU
WATKINS GLEN PH 2C	40071	KU
WATKINS GLEN PH 3	40071	KU
L. J. PLAZA	40150	KU
ADENA TRACE	40160	KU
CATO AND LOGSDON	40160	KU
COWLEY CROSSING SEC 2	40160	KU
FAIRMONT COMMERCIAL PROPERTIES	40160	KU
HILLTOP TERRACE SEC 10	40160	KU
JANES SUBDIVISION LOT 3	40160	KU
MARBURY TRACE APARTMENTS	40160	KU
MHP, PARKSIDE MANOR	40160	KU

SHELTON WOODS PLACE - SECTION 2	40160	KU
SPARKS POINT	40160	KU
ABERDEEN ESTATES SEC 1	40162	KU
COTTONWOOD ESTATES SEC 1	40162	KU
OSBORNE TRACE ESTATES SEC 2	40162	KU
OSBORNE TRACE ESTATES SEC 3	40162	KU
GREENBRIER ESTATES SEC 1	40175	KU
GREENBRIER ESTATES SECTION 2	40175	KU
MOUNTAIN VIEW ESTATES SEC 2	40175	KU
VINELAND PARK	40175	KU
VINELAND PARK SUB SEC 5	40175	KU
VINELAND PARK SUB SEC 8	40175	KU
VINELAND SUB SEC 6	40175	KU
CLARK HILL	40311	KU
CLARK HILL UNIT 2	40311	KU
ADENA RIDGE UNIT 7 SEC 5	40324	KU
ALTON ESTATES PH 3	40324	KU
BRADFORD PLACE	40324	KU
BRADFORD PLACE UNIT ?	40324	KU
BRADFORD PLACE UNIT 3G	40324	KU
BRADFORD PLACE UNIT 3H	40324	KU
BRADFORD PLACE UNIT 3J	40324	KU
BRADFORD PLACE UNIT 3K	40324	KU
BRADFORD PLACE UNIT 4A	40324	KU
BRADFORD PLACE UNIT 4B	40324	KU
BRADFORD PLACE UNIT 4C	40324	KU
CANEWOOD	40324	KU
CANEWOOD	40324	KU
CANEWOOD SECTION 5	40324	KU
CANEWOOD SECTION 6	40324	KU
CANEWOOD TOWNHOMES UNIT 2	40324	KU
CHERRY BLOSSOM PH 2	40324	KU
CHERRY BLOSSOM TOWNHOMES PH 1	40324	KU
CHERRY BLOSSOM UNIT 1B	40324	KU
COLEMAN PROPERTY	40324	KU
DEER RUN	40324	KU
DREAM CHASE ESTATES	40324	KU
DUNCAN PROPERTY UNIT 1	40324	KU
EAST MAIN ESTATES	40324	KU
ELK RIVER APARTMENTS	40324	KU
ELKHORN GREEN UNIT 1	40324	KU
ELKHORN GREEN UNIT 2	40324	KU
ELKHORN GREEN UNIT 6	40324	KU
ELKHORN GREEN UNIT 7	40324	KU
ELKHORN GREEN UNIT 8	40324	KU
FAIRFIELD FARM	40324	KU
FISHERS MILL LANDING UNIT 1 D	40324	KU
FOREST OAKS	40324	KU
FOX RUN	40324	KU
GEORGETOWN APARTMENTS PH 2	40324	KU
GEORGETOWN COMMUNITY HOSPITAL	40324	KU
GOLF HOMES OF CHERRY BLOSSOM	40324	KU
GOLF HOMES OF CHERRY BLOSSOM PH4	40324	KU
GOLF HOMES OF CHERRY BLOSSOM PH4	40324	KU
HARBOR VILLAGE UN 3 PH2 UN 1 PH3	40324	KU
HARBOR VILLAGE UNIT 1 PH 2	40324	KU
HARMONY RIDGE PH 1-A	40324	KU
HARMONY RIDGE PH 1-B	40324	KU
HARMONY RIDGE PH 1C	40324	KU
HARMONY RIDGE PH 1-D	40324	KU
HARMONY RIDGE PH 2	40324	KU

HOLIDAY INN (GEORGETOWN)	40324	KU
HOMESTEAD	40324	KU
HOMESTEAD PH 7	40324	KU
HOMESTEAD PH 8	40324	KU
HOMESTEAD PH 8B	40324	KU
HWY LAND COMPANY	40324	KU
IRONWORKS ESTATES	40324	KU
KELLY OWEN OFFICE PARK	40324	KU
KOHL'S (GEORGETOWN)	40324	KU
LAKE FOREST UNIT 1A	40324	KU
LAKE FOREST UNIT 2	40324	KU
LAKE FOREST UNIT 3A	40324	KU
LAKE FOREST UNIT 3B	40324	KU
LANES RUN FARM PH 1 SEC 1	40324	KU
LOWE'S (GEORGETOWN)	40324	KU
MALLARD POINT	40324	KU
MALLARD POINT PH 1 UNIT 5	40324	KU
MALLARD POINT PH 1 UNIT 6	40324	KU
MANSION ESTATES PH 2	40324	KU
MCCLELLAND SPRINGS PH 1	40324	KU
MEADOWS ROCKY CREED SEC 1A-2	40324	KU
MEADOWS ROCKY CREED SEC 1B	40324	KU
MUIRFIELD PLACE	40324	KU
PAYNES CROSSING UNIT 1 SEC 1	40324	KU
PAYNES CROSSING UNIT 1 SEC 2	40324	KU
PAYNES CROSSING UNIT 2 SEC 1	40324	KU
PAYNES CROSSING UNIT 2 SEC 2	40324	KU
PAYNES CROSSING UNIT 2 SEC 3	40324	KU
PAYNES LANDING UNIT 1	40324	KU
PAYNES LANDING UNIT 10	40324	KU
PAYNES LANDING UNIT 11	40324	KU
PAYNES LANDING UNIT 12	40324	KU
PAYNES LANDING UNIT 15	40324	KU
PAYNES LANDING UNIT 2	40324	KU
PAYNES LANDING UNIT 3	40324	KU
PAYNES LANDING UNIT 5	40324	KU
PAYNES LANDING UNIT 6	40324	KU
PAYNES LANDING UNIT 7	40324	KU
PAYNES LANDING UNIT 8	40324	KU
PAYNES LANDING UNIT 9	40324	KU
PLEASANT VALLEY SEC 2	40324	KU
PLEASANT VALLEY SUB. UNIT 1A	40324	KU
RICH FIELD FARMS 2	40324	KU
RICHFIELD FARM	40324	KU
ROCKY CREEK FARM 1C	40324	KU
ROCKY CREEK FARM 1D	40324	KU
ROCKY CREEK FARM 1E	40324	KU
ROCKY CREEK FARM 1F	40324	KU
ROCKY CREEK PH 5 SEC 2	40324	KU
ROCKY CREEK RESERVE UNIT 1 SEC 4	40324	KU
ROCKY CREEK SEC 3A	40324	KU
ROCKY CREEK SEC 3B	40324	KU
SCOTT CO. HABITAT FOR HUMANITY	40324	KU
SPINDLETOP MOBLIE HOME PARK	40324	KU
SPRING ISLAND ESTATES	40324	KU
STONE HORSE ESTATES	40324	KU
STONECREST UNIT 1A	40324	KU
STONECREST UNIT 1B	40324	KU
STONECREST UNIT 1C	40324	KU
STONECREST UNIT 1E	40324	KU
SUTTON PLACE PH 1	40324	KU

SUTTON PLACE PH 1A	40324	KU
SUTTON PLACE PH 2	40324	KU
SUTTON PLACE PH 3	40324	KU
SUTTON PLACE PH 6	40324	KU
THE COLONY UNIT 10	40324	KU
THE COLONY UNIT 11	40324	KU
THE ENCLAVE	40324	KU
THE HERITAGE ESTATES PH 1	40324	KU
THE HERITAGE ESTATES PH 2	40324	KU
THE PAVILLION COURTYARDS SEC 1	40324	KU
THE SHOPPES AT CHERRY POINTE	40324	KU
THOROUGHbred ACRES UNIT 11	40324	KU
THOROUGHbred ACRES UNIT 13-A	40324	KU
THOROUGHbred ACRES UNIT 13-B	40324	KU
THOROUGHbred ACRES UNIT 13-C	40324	KU
THOROUGHbred ACRES UNIT 2-A	40324	KU
THOROUGHbred ACRES UNIT 2-B	40324	KU
THOROUGHbred ACRES UNIT 4	40324	KU
THOROUGHbred ACRES UNIT 6-B	40324	KU
THOROUGHbred ACRES UNIT 7-A	40324	KU
THOROUGHbred ACRES UNIT 7-B	40324	KU
THOROUGHbred ACRES UNIT 7-C	40324	KU
THOROUGHbred ACRES UNIT 8-A	40324	KU
THOROUGHbred ACRES UNIT 8-B	40324	KU
VICTORIA ESTATES PH 2 SEC D	40324	KU
VICTORIA ESTATES PH 3B SEC B	40324	KU
VICTORIA ESTATES PH 3B SEC B-2	40324	KU
VILL OF FALLS CREEK PH 1 UNIT 3	40324	KU
VILL OF FALLS CREEK PH 1 UNIT 4	40324	KU
VILL. OF FALLS CREEK PH 1 UNIT 2	40324	KU
VILL. OF FALLS CREEK PH 1 UNIT 5	40324	KU
VILLAGE AT LANES RUN PH 2, SEC 2	40324	KU
VILLAGE OF ELKHORN GREEN UNIT 7	40324	KU
VIOLETS TRACE UNIT 1A	40324	KU
VIOLETS TRACE UNIT 1B	40324	KU
VIOLET'S TRACE UNIT 1C	40324	KU
VIOLET'S TRACE UNIT 1D	40324	KU
WAHLAND HALL CROSSING PH 2	40324	KU
WAL-MART (GEORGETOWN)	40324	KU
WARD HALL PH 2	40324	KU
WARE PROPERTY	40324	KU
WHITE OAK VILLAGE	40324	KU
WILEY PROPERTY	40324	KU
WINDING OAKS	40324	KU
WYNDAMERE APARTMENTS PH 1	40324	KU
WYNDAMERE APARTMENTS PH 2	40324	KU
CHERRY TREE PLAZA	40330	KU
CHERRY TREE PLAZA PH 3	40330	KU
CHIMNEY ROCK ESTATES	40330	KU
GRACE COURT	40330	KU
HARRODS TRACE UNIT 2	40330	KU
LEE OAK ESTATES	40330	KU
PROSPEROUS PLACE UNIT 1A	40330	KU
SCENIC HILL 2	40330	KU
VIRGINIA HEIGHTS	40330	KU
INDIAN POINT	40336	KU
ALTON HEIGHTS	40342	KU
BLUE GRASS ESTATES	40342	KU
BRIARCREEK	40342	KU
COPPERFIELD SUB (LAWRENCEBURG)	40342	KU
EAGLE LAKE DEVELOPEMENT	40342	KU

GREEN ACRES TRAILER PARK	40342	KU
HIGHPOINT COMMERCE PARK	40342	KU
HONEYSUCKLE	40342	KU
HONEYSUCKLE PHASE 4B SEC 1	40342	KU
LAWRENCEBURG CROSSING	40342	KU
NINEVAH	40342	KU
RUNNING BROOK PH 2	40342	KU
RUNNING BROOK PH 3	40342	KU
SILVER LEAF	40342	KU
STONEBROOK ESTATES	40342	KU
STONEBROOK ESTATES 1A	40342	KU
STONEBROOK ESTATES 1B	40342	KU
THE GARDENS UNIT 1A	40342	KU
THE MEADOWS SEC 1	40342	KU
THE MEADOWS SEC 2	40342	KU
THOROUGHbred ESTATES PH 5	40342	KU
WITHERSPOON	40342	KU
FISHERS MILL LANDING UNIT 1E	40347	KU
FISHERS MILL LANDING UNIT 2C	40347	KU
LOGAN PROPERTY PH1	40347	KU
LOCKGEE ESTATES	40351	KU
ACORN FALLS	40353	KU
ARTHURS PLACE	40353	KU
CLASSIC VILLAGE	40353	KU
DOVE TRACE ESTATES UNIT 2	40353	KU
GLT PROPERTIES	40353	KU
H LEWIS & KATHERINE GREENE	40353	KU
HIGHLANDS SUBDIVISION	40353	KU
LA CROIX SUBDIVISION	40353	KU
MALLARD POINT ESTATES	40353	KU
MOUNT STERLING APARTMENTS	40353	KU
NORTH JOHNSON ADD SEC 1	40353	KU
NORTH JOHNSON ADD SEC 2	40353	KU
OLD SILO RETIREMENT COMMUNITY	40353	KU
SNOWCREEK PH 7	40353	KU
SOUTHRIDGE PH 1	40353	KU
SOUTHRIDGE PH 2	40353	KU
SOUTHRIDGE PH 3	40353	KU
SOUTHRIDGE PH 4	40353	KU
STONE CREEK ESTATES	40353	KU
STONER PLACE PH 1	40353	KU
STONER PLACE PH 11A	40353	KU
STONER PLACE PH 11B	40353	KU
SUNSET RIDGE UNIT 1	40353	KU
SUNSET RIDGE UNIT 2	40353	KU
SUNSET RIDGE UNIT 3	40353	KU
THE VILLAGE PH 3	40353	KU
THE WOODLANDS UNIT 3	40353	KU
VALHALLA UNIT 2	40353	KU
VALHALLA UNIT 3	40353	KU
VALHALLA UNIT 4	40353	KU
VALHALLA UNIT 5	40353	KU
WELSLEY PLACE	40353	KU
BARKLEY WOODS UNIT 1-6	40356	KU
BRANNON CROSSING SHOPPING CENTER	40356	KU
CAMBRIDGE ESTATES NORTH UNIT 1-A	40356	KU
CAMBRIDGE ESTATES NORTH UNIT 1-B	40356	KU
CHRIS HAVEN 1	40356	KU
CLAYS CROSSING	40356	KU
CROSSWOODS 3	40356	KU
DRAKES LANDING	40356	KU

GREYSON ON 27	40356	KU
HALF ARCE SUBDIVISION	40356	KU
HALFHILL ESTATES PH 1	40356	KU
HOOVER ESTATES	40356	KU
LEGACY ESTATES	40356	KU
MAN-O-WAR PARK	40356	KU
SUNNY SLOPE FARM UNIT 2H	40356	KU
SUNNY SLOPE FARM UNIT 2I	40356	KU
SUNNY SLOPE FARM UNIT 2J	40356	KU
SUNNY SLOPE FARM UNIT 2K	40356	KU
SUNRISE ESTATES	40356	KU
THE EQUESTRIAN RESERVE	40356	KU
THE RESERVE AT TATES CREEK	40356	KU
WYNDHAM HILLS UNIT 6	40356	KU
CREEKSIDE VILLAGE	40360	KU
ADENA SPRINGS	40361	KU
BROOKSTONE PH 2	40361	KU
FOX RUN-HOUSTON OAKS	40361	KU
GREYSTONE	40361	KU
HIGHLANDS UNITS 1 & 2	40361	KU
HOUSTON OAKS PHASE 1	40361	KU
HOUSTON OAKS PHASE 2	40361	KU
LAKEVIEW SUBDIVISION	40361	KU
LAKEVIEW UNIT 2	40361	KU
PARIS BOURBON COUNTY	40361	KU
PEACOCK COVE	40361	KU
SYCAMORE COVE ESTATES	40361	KU
THE COLONADE	40361	KU
WINDHAM HILL	40361	KU
CEDAR HILLS 2B	40370	KU
WEST WOODS	40370	KU
WHISPERING HILLS RV CAMPGROUND	40370	KU
MIDLAND ESTATES	40371	KU
BUFFALO SPRINGS	40379	KU
CEDAR GROVE BAPTIST CHURCH	40379	KU
EDGEWATER PH 1	40379	KU
MARSTON PROPERTY	40379	KU
RUARK PROPERTY	40379	KU
SPRINGVIEW GARDENS	40379	KU
WOODLAND ESTATES	40379	KU
115-117 & 119 CROSSFIELD DR	40383	KU
2195 TYRONE PIKE	40383	KU
ADENA TRACE	40383	KU
ADENA TRACE UNIT 4	40383	KU
ADENA WOODS UNIT 1	40383	KU
ARBOR PLACE TOWNHOMES	40383	KU
BLUEGRASS ESTATES SEC 1	40383	KU
BLUEGRASS ESTATES SEC 2	40383	KU
BOONEDALE FARMS	40383	KU
BROOKDALE	40383	KU
CEDAR RIDGE UNIT 3	40383	KU
CHARMAC ESTATES UNIT 2	40383	KU
CHARMIL ESTATES	40383	KU
COLONY SUB UNIT 5	40383	KU
DAISY HILL	40383	KU
DELANEY WAY SUB UNIT II	40383	KU
DOROTHY JONES PROP	40383	KU
EAGLE CREST UNIT 3	40383	KU
EAGLE CREST UNIT 4	40383	KU
EDMUNDS CROSS UNIT 1A	40383	KU
EDMUNDS CROSS UNIT 1B	40383	KU

ELM CORNER ROAD 370	40383	KU
GLENEAGLES UNIT 1A	40383	KU
GLENEAGLES UNIT 1B	40383	KU
HELMSLEY II - THE SHIRE	40383	KU
HUNTERS RIDGE UNIT 1	40383	KU
HUNTERS RIDGE UNIT 3B	40383	KU
HUNTERS RIDGE UNIT 5-C	40383	KU
HUNTERTOWN GLEN ESTATES	40383	KU
HUNTERTOWN GLEN NORTH UNIT 1	40383	KU
HUNTERTOWN GLEN NORTH UNIT 2	40383	KU
HUNTERTOWN GLEN NORTH UNIT 3	40383	KU
HUNTERTOWN VILLAGE	40383	KU
J.E.O. FARMS	40383	KU
LANCASTER PLACE	40383	KU
LU PREESE PLACE 2	40383	KU
MACK & BESSIE JONES PROO.	40383	KU
PADDOCK PLACE UNIT 2A	40383	KU
PARKVIEW SUB SEC 3	40383	KU
ROSE RIDGE	40383	KU
ROSE RIDGE UNIT 2	40383	KU
ROSE RIDGE UNIT 4	40383	KU
SHAWNEE FARMS	40383	KU
SUGARTREE UNIT 1	40383	KU
SUGARTREE UNIT 2	40383	KU
VERSAILLES CITY GOVERNMENT SHT 2	40383	KU
WINSTAR FARM	40383	KU
WINSTAR FARM	40383	KU
WINSTAR FARM	40383	KU
WOODAMERE TOWNHOMES UNIT 1	40383	KU
WOODAMERE TOWNHOMES UNIT 2	40383	KU
WOOLDRIDGE GARDENS PH 2 SEC 1B-1	40383	KU
WOOLDRIDGE GARDENS PH 2 SEC 2A	40383	KU
WACO HEIGHTS	40385	KU
BETHEL POINT	40390	KU
HAMMOND PARK SUBDIVISION	40390	KU
JUNE RICH FARM	40390	KU
TALBOTT UNIT 5	40390	KU
APPLE RIDGE	40391	KU
ASPEN PLACE	40391	KU
COLBY RIDGE EXT	40391	KU
COLBY RIDGE UNIT 8	40391	KU
CREEKSIDE ESTATES	40391	KU
EARLYMEADE SUB UNIT 3B	40391	KU
EARLYMEADE UNIT 3A	40391	KU
GEORGE S. & ELIZABETH C. BROOKS	40391	KU
GIL MAE ESTATES	40391	KU
HD VENTURES, LLC	40391	KU
MALLARD PLACE UNIT 6B	40391	KU
MHP, QUICKSHOP TRAILER PARK PH 4	40391	KU
OAKMONT VILLAS UNIT 3	40391	KU
R JEFF ADAMS & DEBRA W ADAMS	40391	KU
ROYAL OAK ESTATES PH 2	40391	KU
ROYAL OAK ESTATES PH 5A	40391	KU
ROYAL OAK ESTATES PH 6	40391	KU
SANDLEWOOD POINTE	40391	KU
SCOTTISH HIGHLANDS	40391	KU
TIERNEY STORAGE UNIT 4	40391	KU
TUCKERS FARM PH 1	40391	KU
WINCHESTER INDUSTRIAL PARK	40391	KU
WINCHESTER RETIREMENT PH 2	40391	KU
WINCHESTER RETIREMENT PH 3	40391	KU

WINCHESTER RETIREMENT PH 4	40391	KU
ARGYLL WOODS (DANVILLE)	40422	KU
COTTAGE MANOR	40422	KU
DANVILLE SENIOR HOUSING	40422	KU
JOHN HILL BAILEY INDUSTRIAL PARK	40422	KU
MCDOWELL ESTATES	40422	KU
MHP, CLARKS RUN	40422	KU
MHP, IMPERIAL	40422	KU
RIVERVIEW ESTATES SUBDIVISION	40422	KU
SHELBY GREEN PH 2 SEC 1	40422	KU
SHELBY GREEN SEC 5	40422	KU
THE HUNT FARM	40422	KU
THE HUNT FARM SEC 1	40422	KU
THE HUNT FARM SEC 2	40422	KU
THE HUNT FARM SEC 3	40422	KU
THE VINEYARD	40422	KU
WILLIAM C HUNDLEY	40422	KU
WILLIAMSBURG VILLAGE	40422	KU
BRIGHTLEAF ESTATES	40444	KU
CADE'S COVE	40444	KU
CAMP DICK ACRES SEC 3	40444	KU
CAMP DICK ACRES SEC 4	40444	KU
CREEKSIDE ESTATES	40444	KU
HELTON SUBDIVISION	40444	KU
HERITAGE PLACE	40444	KU
LAKE VALLEY ESTATES	40444	KU
MEADOWVIEW ESTATES PH 1	40444	KU
RIDGE CREST ESTATES PH 5	40444	KU
VICTORIAN HILLS PH 1	40444	KU
WOODSPRINGS PH 2	40444	KU
CAVE VALLEY APARTMENTS	40456	KU
HIDDEN CREEK (MT VERNON)	40456	KU
ADAMS PLACE	40475	KU
AMSTER WOODS	40475	KU
ARGYLL	40475	KU
ARGYLL BLOCK 1	40475	KU
ARGYLL WOODS BLOCK 2	40475	KU
ASHPARK SUBDIVISION	40475	KU
ASHWOOD SUBDIVISION	40475	KU
AUTUMN PLACE	40475	KU
AVAWAM ENTERPRISES	40475	KU
BANYAN @ GOLDENLEAF 1	40475	KU
BATTLEFIELD PLACE	40475	KU
BAY COLONY (RICHMOND)	40475	KU
BAY VIEW	40475	KU
BLUEGRASS CAMP MOBILE HOME 2	40475	KU
BLUEGRASS CAMPGROUND MOBILE HOME	40475	KU
BOONE VILLAGE #4	40475	KU
BRADFORD COURT	40475	KU
BRIAR WOOD ESTATES	40475	KU
BROCKLYN	40475	KU
BROOKLINE	40475	KU
CANYON COVE	40475	KU
CAREY ACRES SH 1	40475	KU
CASTLEWOOD	40475	KU
CLAY POINT	40475	KU
COTTAGE HEATH APARTMENTS	40475	KU
COVINGTON WOODS SEC 1	40475	KU
COVINGTON WOODS SEC 2	40475	KU
DERBY CHASE	40475	KU
DOUBLE D MEADWS	40475	KU

DOVES LANDING	40475	KU
EAST RIDGE APARTMENTS	40475	KU
EDGEWOOD (RICHMOND)	40475	KU
ESTATES AT GREY OAKS	40475	KU
FIELDSTONE CENTER	40475	KU
FIELDSTONE SUBDIVISION	40475	KU
FOLEY DEVELOPEMENT	40475	KU
FOREST HILLS ESTATES PH 1	40475	KU
FOREST HILLS ESTATES PH 2	40475	KU
FOREST HILLS ESTATES PH 3	40475	KU
GARY BENNET MINOR PLAT	40475	KU
GREAY OAKS PH 1	40475	KU
GREY OAK CONDOMINIUMS	40475	KU
GREY OAKS PH 1	40475	KU
HAMPTON WAY PH 2	40475	KU
HARTLAND	40475	KU
HERITAGE PLACE PH III C PH IV A	40475	KU
HERITAGE PLACE PH IV	40475	KU
HERITAGE PLACE PH V	40475	KU
HERITAGE PLACE PH VI	40475	KU
HERITAGE PLACE PHASE II-A	40475	KU
HERITAGE PLACE PHASE II-C	40475	KU
HIDDEN HILLS PH 11C	40475	KU
HIDDEN HILLS PHASE 1	40475	KU
HIDDEN HILLS PHASE 2	40475	KU
HIGH MEADOWS	40475	KU
HIGHLAND PARK	40475	KU
HIGHLAND PARK PLACE PH 1	40475	KU
HILLCREST #5	40475	KU
J. W. MURPHY PROP.	40475	KU
JERGEE PLACE	40475	KU
JOHN HALCOMB	40475	KU
KENSINGTON PLACE	40475	KU
KING'S GATE PH 1	40475	KU
KING'S GATE PH 2	40475	KU
LAKE RIDGE ESTATES	40475	KU
LAKE RIDGE ESTATES PH 1	40475	KU
LAKE RIDGE ESTATES PH 2	40475	KU
LANEY BROOKE PLACE	40475	KU
LINDEN STREET PH 3	40475	KU
LOWER SOUTH POINTE PH 1	40475	KU
MAGNOLIA POINTE PH 1	40475	KU
MAGNOLIA POINTE PH 2	40475	KU
MAGNOLIA POINTE PH 6	40475	KU
MAGNOLIA POINTE PH 6A	40475	KU
MANN CHRYSLER OF RICHMOND	40475	KU
MAPLELAWN EST. BLOCK B	40475	KU
MERRICK CENTER LOTS 4, 5, 6	40475	KU
MHP, MADISON	40475	KU
NEW MADISON COUNTY ELEM SCHOOL	40475	KU
OAK RIDGE FARMS PH 1	40475	KU
OCTOBER GLORY AT GOLDEN LEAF	40475	KU
OLD TOWN BRANCH ROAD FARM	40475	KU
OLDE SOUTH ESTATES	40475	KU
ORCHARD HILL PH 4	40475	KU
ORCHARD HILLS	40475	KU
PADDLEFOOT CENTER	40475	KU
PAVILLION AT GOLDENLEAF PH 2	40475	KU
PERSIMMON TRACE TRACT 10	40475	KU
PIONEER HOUSING	40475	KU
QUAIL WEST PH 3	40475	KU

REDLINE PROPERTIES	40475	KU
RICHMOND BUSINESS CENTER PHASE 2	40475	KU
RICHMOND CENTRE	40475	KU
RICHMOND INDUSTRIAL PARK SOUTH 2	40475	KU
RICHMOND PLACE	40475	KU
RICHWOOD BLOCK 6	40475	KU
RICHWOOD BLOCK 7	40475	KU
RIDGE HAVEN PH 1	40475	KU
RIDGE HAVEN PH 2	40475	KU
RIVENDELL	40475	KU
RJD ENTERPRISES	40475	KU
SAM SWOPE HONDA (RICHMOND)	40475	KU
SEVEN OAKS	40475	KU
SEVEN OAKS PH 1	40475	KU
SEVEN OAKS PH 2	40475	KU
SHADY OAKS ESTATES PH 1	40475	KU
SHILOH COVE	40475	KU
SHILOH CREST	40475	KU
SHILOH POINTE PH 2 BLOCK A	40475	KU
SHILOH POINTE PH 4	40475	KU
SIESTA VILLAGE	40475	KU
SOUTH BLUEGRASS CENTER	40475	KU
SOUTH POINTE	40475	KU
ST ANDREWS CONDOMINIUMS	40475	KU
ST ANDREWS CONDOS PH 5 AMEND. 1	40475	KU
ST ANDREWS PH 6	40475	KU
ST ANDREWS RETIREMENT COMM PH 4	40475	KU
STATELAND SOUTH BLOCK C	40475	KU
STOCKER PLACE	40475	KU
STONEGATE ESTATES PH 1	40475	KU
STONEGATE ESTATES PH 2	40475	KU
STONEWALL ESTATES	40475	KU
TAMMY AND JERRY GILBERT	40475	KU
THE BEGINNINGS PH I	40475	KU
THE BEGINNINGS PH II	40475	KU
THE BEGINNINGS PH III	40475	KU
THE MEADOWS PH 1	40475	KU
THE MEADOWS PH 2	40475	KU
THE MEADOWS PH 3	40475	KU
THE SUMMIT	40475	KU
THE WOODLANDS	40475	KU
THE WOODS	40475	KU
TOYOTA SOUTH	40475	KU
TRADITIONS AT PARKEY FALLS PH 1	40475	KU
TRADITIONS AT PARKEY FALLS PH 2	40475	KU
TUSCANY DEVELOPMENT	40475	KU
TWIN LAKES PH 1	40475	KU
VALLEY GREEN	40475	KU
WALNUT GROVE (RICHMOND)	40475	KU
WATERFORD PLACE	40475	KU
WATERFORD PLACE PH 1	40475	KU
WATERFORD PLACE PH 3	40475	KU
WATERFORD PLACE PH 4	40475	KU
WATERFORD PLACE PH 5	40475	KU
WELLSRIDGE TRACE PH 1	40475	KU
WILMORE PARK CONDOS	40475	KU
WINDCREST	40475	KU
WOODLAND COUNTRY ESTATES	40475	KU
FOSTER LANE PH 6	40484	KU
FOSTERS LANE PH 4	40484	KU
FOSTERS LANE PH 5	40484	KU

MASON'S LANDING APARTMENTS	40484	KU
OAKVILLE ESTATES	40484	KU
WALNUT GROVE SEC 1	40484	KU
WALNUT GROVE SEC 2	40484	KU
ASHLAND PARK	40502	KU
CASTLEGATE SUBDIVISION UNIT 1	40502	KU
LAKEVIEW ACRES UNIT 3A LOT 12	40502	KU
LANSDOWNE SHOPPING CTR	40502	KU
MALIBU APARTMENTS	40502	KU
SHADY BROOK ESTATES	40502	KU
201 & 213 RUCCIO WAY	40503	KU
BERRY CREST PH 1	40503	KU
CLAYS MILL PLAZA	40503	KU
FAYETTE MALL	40503	KU
LAFAYETTE HIGH SCHOOL	40503	KU
LEXINGTON MEDICAL ARTS PROPERTY	40503	KU
LONGLEAF PLACE	40503	KU
LONGLEAF PLACE UNIT 2	40503	KU
MEDICAL ARTS CENTER (FAYETTE)	40503	KU
NDC PROPERTY UNIT 1 LOT 5	40503	KU
NDC PROPERTY UNIT 1A LOT 21	40503	KU
NDC PROPERTY UNIT 4 SEC 1 LOT 1	40503	KU
NICHOLASVILLE ROAD 1740	40503	KU
PASADENA POINTE	40503	KU
PASADENA WOODS	40503	KU
RABBIT RUN SUBDIVISION	40503	KU
RABBIT RUN UNIT 11A	40503	KU
RABBIT RUN UNIT 11B	40503	KU
REGENCY POINT/TOWNHOUSES OF LEX	40503	KU
SOUTH FARM MARKETPLACE	40503	KU
SPRINGDALE SUBDIVISION NO2	40503	KU
THE PLAZA AT THE FAYETTE MALL	40503	KU
WEBB PROPERTIES OFICE PARK	40503	KU
WEBB PROPERTIES UNIT 1	40503	KU
WELLINGTON 1A	40503	KU
WELLINGTON TOWNHOUSE UNIT 5	40503	KU
WELLINGTON UNIT 2	40503	KU
WELLINGTON UNIT 5D SEC 1	40503	KU
WELLINGTON UNIT 5D SEC 3	40503	KU
WIGGINS CO. & CARROLL COLE PROP	40503	KU
WINDING CREEK AT MONTICELLO	40503	KU
ZANDALE SHOPPING CENTER	40503	KU
ALEXANDRIA DRIVE 2312	40504	KU
BORDEN PROPERTY	40504	KU
COPPER HILL KINGDOM HALL	40504	KU
HEADLEY GREEN UNIT 4B	40504	KU
INGLESIDE APARTMENTS	40504	KU
SADDLE CLUB UNIT 1 SEC A	40504	KU
SADDLE CLUB UNIT 1 SEC B	40504	KU
SADDLE CLUB UNIT 1 SEC C	40504	KU
BLUEGRASS EXECUTIVE PARK	40505	KU
BLUEGRASS WILKES UNIT 1 SEC 1	40505	KU
BLUEGRASS WILKES UNIT 1 SEC 2	40505	KU
BLUEGRASS WILKES UNIT 2A	40505	KU
BLUEGRASS WILKES UNIT 2B	40505	KU
BRYAN STATION CENTER	40505	KU
EASTLAND PKWY SUB LOT 2	40505	KU
EASTLAND SHOPPING CENTER	40505	KU
LEXINGTON PROF. BASEBALL PROP.	40505	KU
PATCHEN WILKES UNIT 1A	40505	KU
PATCHEN WILKES UNIT 1B	40505	KU

PATCHEN WILKES UNIT 1C	40505	KU
PATCHEN WILKES UNIT 1D	40505	KU
WRITT STATION	40505	KU
ANGILANA SUBDIVISION	40508	KU
ANGILANA SUBDIVISION	40508	KU
BLUEGRASS ASPENDALE	40508	KU
CHARLOTTE COURT UNIT 2	40508	KU
SOUTH BROADWAY UNIVERSITY	40508	KU
SOUTH HILL GARDENS	40508	KU
ADAMS PROPERTY	40509	KU
ANDERSON PROPERTY UNIT 1	40509	KU
ANDERSON PROPERTY UNIT 3	40509	KU
ANDERSON PROPERTY UNIT 4	40509	KU
BIG SPRING SECTION 2	40509	KU
BLACKFORD PH 1 UNIT 1C SEC 2	40509	KU
BLACKFORD PH 1 UNIT 1D SEC 2	40509	KU
BLACKFORD PH 1 UNIT 1E SEC 2	40509	KU
BLACKFORD PH 1 UNIT 4E SEC 1	40509	KU
Blackford Ph 3 Unit 1N	40509	KU
Blackford Ph 3 Unit 1N Sec 1	40509	KU
Blackford Ph 3 Unit 1P Sec 1	40509	KU
Blackford Ph 3 Unit 1P Sec 2	40509	KU
BLACKFORD PROP. PH 3 UNIT 1C	40509	KU
BLACKFORD PROP. PH 3 UNIT 1D	40509	KU
BLACKFORD PROPERTY PH 1 UNIT 3A	40509	KU
BLACKFORD PROPERTY PH 1 UNIT 3B	40509	KU
BLACKFORD PROPERTY PH 1 UNIT 4A	40509	KU
BLACKFORD PROPERTY PH 1 UNIT 4B	40509	KU
BLACKFORD PROPERTY PH 1 UNIT 4C	40509	KU
BLACKFORD PROPERTY PH 1 UNIT 4D	40509	KU
BLACKFORD PROPERTY PH 1 UNIT 4F	40509	KU
BLACKFORD PROPERTY PH 1 UNIT 5C	40509	KU
BLACKFORD PROPERTY PH 2 UNIT 1A	40509	KU
BLACKFORD PROPERTY PH 2 UNIT 1B	40509	KU
BLACKFORD PROPERTY PH 2 UNIT 1C	40509	KU
BLACKFORD PROPERTY PH 3 UNIT 1A	40509	KU
BLACKFORD PROPERTY PH 3 UNIT 1B	40509	KU
BLACKFORD PROPERTY PH 3 UNIT 1E	40509	KU
BLACKFORD PROPERTY PH 3 UNIT 1F	40509	KU
BLACKFORD PROPERTY PH 3 UNIT 1G	40509	KU
BLACKFORD PROPERTY PH 3 UNIT 1H	40509	KU
BLACKFORD PROPERTY PH 3 UNIT 1I	40509	KU
BLACKFORD PROPERTY PH 3 UNIT 1J	40509	KU
BLACKFORD PROPERTY UNIT 1J SEC 2	40509	KU
BLUE SKY PARKWAY 699	40509	KU
BRIGHTON EAST TOWNHOMES	40509	KU
BRIGHTON EAST TOWNHOMES UNIT 1A	40509	KU
BRIGHTON EAST TOWNHOMES UNIT 1B	40509	KU
BRIGHTON PLACE SHOPPES	40509	KU
BRIGHTON PLACE SHOPPES PH 2	40509	KU
BRIGHTON PLACE SUB UNIT 6-A	40509	KU
BRIGHTON PLACE SUB UNIT 8	40509	KU
BROCK & BARRY PROP. UNIT 2-A	40509	KU
BRYANT ROAD 1750	40509	KU
CADEN LANDING SEC 1	40509	KU
CADEN LANDING SEC 2	40509	KU
CLARK PROP UNIT 3A	40509	KU
CLARK PROP UNIT 3B	40509	KU
CLARK PROPERTY UNIT 1-A	40509	KU
CLARK PROPERTY UNIT 1-C	40509	KU
CLARK PROPERTY UNIT 1-D	40509	KU

CLARK PROPERTY UNIT 1-E SEC 1	40509	KU
CLARK PROPERTY UNIT 1F	40509	KU
CLARK PROPERTY UNIT 1-G	40509	KU
CLARK PROPERTY UNIT 1-H	40509	KU
CLARK PROPERTY UNIT 1-I	40509	KU
CLARK PROPERTY UNIT 1-J	40509	KU
CLARK PROPERTY UNIT 1-K	40509	KU
CLARK PROPERTY UNIT 1-L	40509	KU
CLARK PROPERTY UNIT 1M	40509	KU
COLT'S RUN APARTMENTS	40509	KU
COUNTRY HILLS UNIT 1-A	40509	KU
COVEY RIDGE DEVELOPEMENT	40509	KU
CRESTVIEW SUB UNIT 1A	40509	KU
CRESTVIEW SUB UNIT 1A LOT 10	40509	KU
CRESTVIEW UNIT 1A SEC 3	40509	KU
DORIS G PHELPS UNIT 1 SEC 1	40509	KU
DORIS G PHELPS UNIT 1 SEC 2	40509	KU
DORIS G PHELPS UNIT 1 SEC 3	40509	KU
DORIS G PHELPS UNIT 1 SEC 4	40509	KU
EASTWOOD UNIT 6	40509	KU
EASTWOOD UNIT 6 SEC 1	40509	KU
FORTUNE BUSINESS CENTER UNIT 2	40509	KU
FOUNTAIN PLAZA UNIT 2 LOT 19, 20	40509	KU
GESS PROPERTY 13A SEC 1	40509	KU
GESS PROPERTY UNIT 11-A	40509	KU
GESS PROPERTY UNIT 11-B	40509	KU
GESS PROPERTY UNIT 11-E	40509	KU
GESS PROPERTY UNIT 11-F	40509	KU
GESS PROPERTY UNIT 11-H	40509	KU
GESS PROPERTY UNIT 12D	40509	KU
GESS PROPERTY UNIT 13A SEC 2	40509	KU
GESS PROPERTY UNIT 13B	40509	KU
GESS PROPERTY UNIT 13C	40509	KU
GESS PROPERTY UNIT 13D	40509	KU
GESS PROPERTY UNIT 14A	40509	KU
GESS PROPERTY UNIT 2A	40509	KU
GESS PROPERTY UNIT 2B	40509	KU
GESS PROPERTY UNIT 2C	40509	KU
GESS PROPERTY UNIT 4A	40509	KU
GESS PROPERTY UNIT 4B	40509	KU
GESS PROPERTY UNIT 4D	40509	KU
GESS PROPERTY UNIT 4E	40509	KU
GESS PROPERTY UNIT 4F	40509	KU
GESS PROPERTY UNIT 4H	40509	KU
GESS PROPERTY UNIT 6A	40509	KU
GESS PROPERTY UNIT 7-A	40509	KU
GESS PROPERTY UNIT 7-B	40509	KU
GESS PROPERTY UNIT 7-C	40509	KU
GESS PROPERTY UNT 5A	40509	KU
GLENEAGLES APT UNIT 5 LOT 1	40509	KU
GLENEAGLES UNIT 3-E	40509	KU
GOLF TOWNHOMES ANDOVER UNIT 10	40509	KU
HAMBURG EAST BAPTIST HEALTHCARE	40509	KU
HAMBURG OFFICE PARK	40509	KU
HAMBURG PLACE B-6P	40509	KU
HAMBURG PLACE COMMUNITY PH 1	40509	KU
HAMBURG PLACE COMMUNITY PH 2	40509	KU
HAMBURG PLACE FARM	40509	KU
HAMBURG PLACE OFFICE PARK	40509	KU
HUNTERS CHASE	40509	KU
LAKEVIEW PROFESSIONAL SUBDIVISION	40509	KU

LIBERTY CORNERS UNIT 1A	40509	KU
LIBERTY CORNERS UNIT 1B	40509	KU
LIBERTY CORNERS UNIT 1C	40509	KU
LIBERTY CORNERS UNIT 1D	40509	KU
LIBERTY CORNERS UNIT 1E	40509	KU
LIBERTY CORNERS UNIT 2A	40509	KU
LIBERTY CORNERS UNIT 2B	40509	KU
LIBERTY RIDGE SENIOR LIVING	40509	KU
LIBERTY ROAD ELEMENTARY SCHOOL	40509	KU
LIBERTY WOODS	40509	KU
LOCHMERE ESTATES	40509	KU
LOCHMERE UNIT 4 SEC 1	40509	KU
LOCHMERE UNIT 6-A	40509	KU
LOCHMERE UNIT 9C	40509	KU
MAN O WAR DEVELOPEMENT UNIT 5E	40509	KU
MAN O WAR DEVELOPEMENT UNIT 1A	40509	KU
MAPLELEAF SQUARE	40509	KU
MAPLELEAF SUBDIVISION	40509	KU
MAPLELEAFDABNEY	40509	KU
MEADOW OAKS UNIT 1C	40509	KU
NEW MARKET POPERTY PH 1 UNIT 6A	40509	KU
NEW MARKET POPERTY PH 1 UNIT 6B	40509	KU
NEW MARKET POPERTY PH 1 UNIT 6C	40509	KU
NEW MARKET POPERTY PH 1 UNIT 6D	40509	KU
NEW MARKET POPERTY PH 1 UNIT 6F	40509	KU
NEW MARKET POPERTY PH 1 UNIT 6G	40509	KU
NEWMARKET PH 1 UNIT 1B	40509	KU
NEWMARKET PH 1 UNIT 2D	40509	KU
NEWMARKET PH 1, UNIT 1C, SEC 2	40509	KU
NEWMARKET PROP UN 8	40509	KU
NEWMARKET PROPERTY PH 1 UNIT 2E	40509	KU
NEWMARKET UNIT 4-A	40509	KU
NEWMARKET UNIT 4-B	40509	KU
NEWMARKET UNIT 4-C	40509	KU
PENNINGTON PLACE	40509	KU
PRESTIWICK	40509	KU
RESERVE AT ANDOVER	40509	KU
RICHARDSON PROPERTY UNIT 3 SEC 1	40509	KU
RICHARDSON PROPERTY UNIT 3 SEC 2	40509	KU
RICHARDSON PROPERTY UNIT 3 SEC 3	40509	KU
RICHARDSON PROPERTY UNIT 6	40509	KU
RICHARDSON PROPERTY UNIT 7	40509	KU
RICHARDSON PROPERTY UNIT 8	40509	KU
RICHMOND WOODS APARTMENTS	40509	KU
SCULLY PROPERTY	40509	KU
SHADY HILLS	40509	KU
SIR BARTON WAY OFFICE WAY	40509	KU
SLEEPY HOLLOW AT TUTTLE STATION	40509	KU
ST JOESEPH EXPANSION	40509	KU
STIVERS PROPERTY	40509	KU
SUMMEAUN RIDGE APTS	40509	KU
SUNSHINE PROPERTY	40509	KU
THE FAIRWAYS AT ANDOVER UNIT 1B	40509	KU
THE FAIRWAYS AT ANDOVER UNIT 1D	40509	KU
THE PINES	40509	KU
THOMAS COMMICATIONS INC UNIT 1A	40509	KU
THOMAS COMMUNICATIONS UNIT 1B	40509	KU
THOMAS COMMUNICATIONS UNIT 1C	40509	KU
THOMAS COMMUNICATIONS UNIT 1D	40509	KU
TOWNHOMES OF FOREST HILLS	40509	KU
TUCKER PROPERTY UNIT 1 SEC 2	40509	KU

TUSCANY UNIT 1	40509	KU
TUSCANY UNIT 11A	40509	KU
TUSCANY UNIT 11B	40509	KU
TUSCANY UNIT 1A	40509	KU
TUSCANY UNIT 1B SEC 1	40509	KU
TUSCANY UNIT 1B SEC 2	40509	KU
TUSCANY UNIT 1C	40509	KU
TUSCANY UNIT 1C SEC 2	40509	KU
TUSCANY UNIT 1D SEC 1	40509	KU
TUSCANY UNIT 1D SEC 2	40509	KU
TUSCANY UNIT 1E	40509	KU
TUSCANY UNIT 3B	40509	KU
TUSCANY UNIT 4A	40509	KU
TUSCANY UNIT 4B	40509	KU
TUSCANY UNIT 4C	40509	KU
TUSCANY UNIT 4D	40509	KU
TUSCANY UNIT 8A	40509	KU
TUSCANY UNIT 9A	40509	KU
TUSCANY UNIT 9B	40509	KU
TUSCANY UNIT 9C	40509	KU
TUSCANY UNIT 9D	40509	KU
TUSCANY UNIT 9E	40509	KU
TUSCANY UNIT 9F SEC 1	40509	KU
TUSCANY UNIT 9F SEC 2	40509	KU
VILLAGE AT HAMBURG FARMS	40509	KU
WALNUT CREEK PH 1	40509	KU
WALNUT CREEK UNIT 2 SEC 1	40509	KU
WALNUT CREEK UNIT 2 SEC 2	40509	KU
WALNUT CREEK UNIT 2 SEC 3	40509	KU
WERNE PROPERTY UNIT 1- A	40509	KU
WERNE PROPERTY UNIT 1 SEC - C	40509	KU
WERNE PROPERTY UNIT 2 - A	40509	KU
WERNE PROPERTY UNIT 2 SEC - B	40509	KU
WERNE PROPERTY UNIT 2 SEC - C	40509	KU
HIGH POINT FARM	40510	KU
LEXINGTONIAN ESTATES REVISION	40510	KU
LITTLE PROPERTY UNIT 1A LOT 1A	40510	KU
LITTLE PROPERTY UNIT 1B	40510	KU
LITTLE PROPERTY UNIT 1C	40510	KU
LITTLE PROPERTY UNIT 1C LOT 8	40510	KU
MAREHAVEN UNIT 1	40510	KU
BELMONT FARM UNIT 4C SEC 1	40511	KU
BENJAMIN & BETTY J FINNEY PROP	40511	KU
BETHEL COMMONS	40511	KU
BLUEGRASS BUSINESS PARK	40511	KU
BLUEGRASS BUSINESS PARK UNIT 5	40511	KU
BLUEGRASS REGIONAL MENTAL HEALTH	40511	KU
BOILING SPRINGS IND. PH 3	40511	KU
BRECKINRIDGE SUB UNIT 1D SEC 1	40511	KU
BRECKINRIDGE SUB UNIT 2	40511	KU
CANDLEWOOD SUITES	40511	KU
CHESAPEAKE EQUINE	40511	KU
CHESAPEAKE EQUINE 2	40511	KU
CITATION POINTE	40511	KU
COLDSTREAM RESEARCH CAMP UNIT 1B	40511	KU
COLDSTREAM STATION UNIT 1- A	40511	KU
COLDSTREAM STATION UNIT 1- B	40511	KU
COLDSTREAM STATION UNIT 1- C	40511	KU
COLDSTREAM STATION UNIT 1- D	40511	KU
COLDSTREAM STATION UNIT 1- E	40511	KU
COLDSTREAM STATION UNIT 1- F	40511	KU

COVENTRY (BELMONT FARM UNIT 1A)	40511	KU
COVENTRY (BELMONT FARM UNIT 1B)	40511	KU
COVENTRY (BELMONT FARM UNIT 1C)	40511	KU
COVENTRY (BELMONT FARM UNIT 1D)	40511	KU
COVENTRY (BELMONT FARM UNIT 1E)	40511	KU
COVENTRY BELMONT FARM UNIT 4A	40511	KU
COVENTRY BELMONT FARM UNIT 4B	40511	KU
COVENTRY BELMONT FARM UNIT 4D	40511	KU
EXECUTIVE PLAZA NORTH	40511	KU
GARDEN MEADOWS UNIT 1C 1D 1E	40511	KU
GIVENS PROPERTY PH A	40511	KU
GIVENS PROPERTY PH B	40511	KU
GIVENS PROPERTY PH C	40511	KU
GLENS AT GREENDALE UNIT 3	40511	KU
GLENS AT GREENDALE VILLAGE 4	40511	KU
GREATHHOUSE PROPERTY 2B SEC 1	40511	KU
GREATHHOUSE PROPERTY 2B SEC 2	40511	KU
GREENDALE HILLS UNIT 1-B	40511	KU
GREENDALE HILLS UNIT 2B	40511	KU
GREENDALE HILLS UNIT 2D	40511	KU
GREENDALE HILLS UNIT 3 PH 2	40511	KU
GREENDALE HILLS UNIT 3A	40511	KU
GREENDALE HILLS UNIT 3-A	40511	KU
GREENDALE HILLS UNIT 3B	40511	KU
GREENDALE HILLS UNIT 3-B	40511	KU
GREENDALE HILLS UNIT 3-C	40511	KU
GREENDALE HILLS UNIT 3-D	40511	KU
GREENDALE HILLS UNIT 3-E	40511	KU
GREENDALE VILLAGE UNIT 1 SEC 1	40511	KU
GREENDALE VILLAGE UNIT 1 SEC 2	40511	KU
GREENDALE VILLAGE UNIT 2 SEC 1	40511	KU
GRIFFIN GATE OFFICE PARK	40511	KU
HILENMEYER PRO UNIT 2A	40511	KU
HILENMEYER PRO UNIT 2B	40511	KU
HILENMEYER PRO UNIT 2C	40511	KU
HILLENMEYER APTS	40511	KU
HILLENMEYER PROP EAST	40511	KU
HILLENMEYER UNIT 1 PHASE 1	40511	KU
HILLENMEYER UNIT 3 SEC A	40511	KU
HILLENMEYER UNIT 3 SEC B	40511	KU
HUNTERFIELD	40511	KU
JOHNSON PROPERTY PH 1	40511	KU
JOHNSON PROPERTY PH 1-A	40511	KU
JOHNSON PROPERTY PH 1-B	40511	KU
JOHNSON PROPERTY PH 1-C	40511	KU
JOHNSON PROPERTY PH 1-D	40511	KU
JOHNSON PROPERTY PH 1-F	40511	KU
JOHNSON PROPERTY UNIT 1-J	40511	KU
JOHNSON PROPERTY UNIT 1-L SEC1	40511	KU
JOHNSON PROPERTY UNIT 1-M	40511	KU
JOHNSON PROPERTY UNIT 1-N SEC 1	40511	KU
JOHNSON PROPERTY UNIT1-H SEC1	40511	KU
KEARNEY HALL UNIT 3 SEC 2	40511	KU
KEARNEY RIDGE UNIT 2A	40511	KU
KONNER WOODS	40511	KU
KONNER WOODS SEC 2	40511	KU
LEX INDUSTRIAL FOUNDATION UN 2	40511	KU
LEXMARK INT	40511	KU
MAGNA INTERNATIONAL TRACT 2	40511	KU
MAREHAVEN UNIT 2 SEC 1	40511	KU
MAREHAVEN UNIT 2 SEC 2	40511	KU

MAREHAVEN UNIT 3	40511	KU
MARSHALL PROPERTY UNIT 1H	40511	KU
MARSHALL PROPERTY UNIT 2A	40511	KU
MARSHALL PROPERTY UNIT 2D	40511	KU
MARSHALL PROPERTY UNIT 2E	40511	KU
MARSHALL PROPERTY UNIT 2F	40511	KU
MARSHALL PROPERTY UNIT 2G	40511	KU
MARSHALL PROPERTY UNIT 2H	40511	KU
MASTERSON DEPRIEST UNIT 1B	40511	KU
MASTERSON DEPRIEST UNIT 1D SEC 2	40511	KU
MASTERSON DEPRIEST UNIT 1E SEC 2	40511	KU
MASTERSON DEPRIEST UNIT 1G	40511	KU
MASTERSON HILLS UNIT 1A	40511	KU
MASTERSON HILLS UNIT 1B	40511	KU
MASTERSON HILLS UNIT 1C SEC 1	40511	KU
MASTERSON HILLS UNIT 1C SEC 2	40511	KU
MASTERSON HILLS UNIT 1D	40511	KU
MASTERSON HILLS UNIT 1E	40511	KU
MASTERSON STATION CENTER	40511	KU
MEADOWTROPPE PLANTATION	40511	KU
MYERS PROPERTY UNIT 1A	40511	KU
MYERS PROPERTY UNIT 1B	40511	KU
MYERS PROPERTY UNIT 1C	40511	KU
NEWTON SPRINGS UNIT 1	40511	KU
NEWTON SPRINGS UNIT 2 SEC 1	40511	KU
NEWTON SPRINGS UNIT 2 SEC 2	40511	KU
NEWTOWN SPRINGS TOWNHOMES	40511	KU
SEBASTIAN PROPERTY UNIT 2	40511	KU
SEBASTIAN PROPERTY UNIT 3A SEC 1	40511	KU
SEBASTIAN PROPERTY UNIT 3B	40511	KU
SEBASTIAN PROPERTY UNIT 3C SEC 1	40511	KU
SEBASTIAN PROPERTY UNIT 3C SEC 2	40511	KU
SEBASTIAN PROPERTY UNIT 3D	40511	KU
SEBASTIAN PROPERTY UNIT 3E	40511	KU
SHARKEY PROPERTY UNIT 1	40511	KU
SHARKEY PROPERTY UNIT 2A	40511	KU
SHARKEY PROPERTY UNIT 2B	40511	KU
SHARKEY PROPERTY UNIT 2C	40511	KU
SHARKEY PROPERTY UNIT 3	40511	KU
SPRING BAY 1B	40511	KU
SPRING BAY UNIT 1A	40511	KU
SPRING BAY UNIT 1C	40511	KU
SULLIVAN/RAMSEY PROP UNIT 1A	40511	KU
SULLIVAN/RAMSEY PROP.PH 1 UNIT 2	40511	KU
SULLIVAN/RAMSEY PROP.PH 1 UNIT 3	40511	KU
SULLIVAN/RAMSEY PROP.PH 1 UNIT 4	40511	KU
TEMA ISENMANN, INC	40511	KU
TOWNLEY PARK APARTMENTS	40511	KU
WOODWARD LANDER PROP UNIT 1A	40511	KU
WOODWARD LANDER UNIT 1 SEC B	40511	KU
WOODWARD LANDER UNIT 1 SEC C	40511	KU
WOODWARD LANDER UNIT 1 SEC D	40511	KU
WOODWARD LANDER UNIT 1 SEC E	40511	KU
WOODWARD LANDER UNIT 1 SEC F	40511	KU
WOODWARD LANDER UNIT 1 SEC G	40511	KU
WOODWARD LANDER UNIT 1 SEC H	40511	KU
BEAUMONT CENTER KRPGERS UNIT 10	40513	KU
BEAUMONT FARM 13-B	40513	KU
BEAUMONT FARM SEC 1 UNIT 1	40513	KU
BEAUMONT FARM UNIT 1 R3	40513	KU
BEAUMONT FARM UNIT 1 SEC 5	40513	KU

BEAUMONT FARM UNIT 12 LOTS 1 & 4	40513	KU
BEAUMONT FARM UNIT 13-A	40513	KU
BEAUMONT FARM UNIT 14 C SEC 2	40513	KU
BEAUMONT FARM UNIT 14 C SEC 3	40513	KU
BEAUMONT FARM UNIT 14-B	40513	KU
BEAUMONT FARM UNIT 2C	40513	KU
BEAUMONT FARM UNIT 3C LOT 4	40513	KU
BEAUMONT FARM UNIT 3-C SEC 2	40513	KU
BEAUMONT FARM UNIT 3-C SEC 2	40513	KU
BEAUMONT FARM UNIT 3-C SEC 2	40513	KU
BEAUMONT FARM UNIT 5	40513	KU
BEAUMONT FARM UNIT 8-H	40513	KU
BEAUMONT FARM UNIT 8-I	40513	KU
BEAUMONT FARM UNIT 8-J	40513	KU
BEAUMONT SEC 1 UNIT 1	40513	KU
BEAUMONT UNIT 12	40513	KU
BEAUMONT UNIT 12	40513	KU
BEAUMOUNT FARM UNIT 2-C SEC 2	40513	KU
BOWMAN HOUSE	40513	KU
DERBY LANDING SUBDIVISION	40513	KU
HOOVER PROPERTY	40513	KU
LEXINGTONIAN ESTATES	40513	KU
MONARCH STREET 1025	40513	KU
PALOMAR CENTRE	40513	KU
PALOMAR COVE	40513	KU
SOUTH ELKHORN VILLAGE	40513	KU
BOSTON ROAD DEVELOPEMENT	40514	KU
COPPER CREEK SUBDIVISION	40514	KU
GLEN AT LOCHDALE UNIT 4A	40514	KU
HIGBEE MILL RESERVE	40514	KU
PINECREST SUBDIVISION UNIT 1A	40514	KU
PINECREST SUBDIVISION UNIT 1B	40514	KU
PINECREST SUBDIVISION UNIT 1C	40514	KU
PINECREST SUBDIVISION UNIT 1D	40514	KU
PINECREST SUBDIVISION UNIT 1E	40514	KU
SUNNY SLOPE FARM TOWNHOMES	40514	KU
SUNNY SLOPE FARM UN 3 LOT102-106	40514	KU
SUNNY SLOPE FARM UNIT 1H	40514	KU
SUNNY SLOPE FARM UNIT 2A	40514	KU
SUNNY SLOPE FARM UNIT 2B	40514	KU
SUNNY SLOPE FARM UNIT 2C	40514	KU
SUNNY SLOPE FARM UNIT 2D	40514	KU
SUNNY SLOPE FARM UNIT 2E	40514	KU
SUNNY SLOPE FARM UNIT 2F	40514	KU
SUNNY SLOPE FARM UNIT 2G	40514	KU
SUNNY SLOPE FARM UNIT 3 PH 2	40514	KU
SUNNY SLOPE FARM UNIT 3A	40514	KU
SUNNY SLOPE FARM UNIT 3B	40514	KU
SUNNY SLOPE FARM UNIT 3C	40514	KU
SUNNY SLOPE FARM UNIT 5	40514	KU
THE GLEN AT LOCHDALE UNIT 2A	40514	KU
THE GLEN AT LOCHDALE UNIT 2B	40514	KU
THE GLEN AT LOCHDALE UNIT 2C	40514	KU
THE GLEN AT LOCHDALE UNIT 2E	40514	KU
THE GLEN AT LOCHDALE UNIT 2F	40514	KU
THE GLEN AT LOCHDALE UNIT 4B 1	40514	KU
THE GLEN AT LOCHDALE UNIT 4C	40514	KU
THE GLEN AT LOCHDALE UNIT 4D	40514	KU
THE GLEN AT LOCHDALE UNIT 4E	40514	KU
WAITS PROPERTY PH 2 UNIT 2A	40514	KU
WAITS PROPERTY PH 2 UNIT 2B	40514	KU

WAVELAND ESTATES UNIT 1A	40514	KU
WAVELAND ESTATES UNIT 1B	40514	KU
WAVELAND ESTATES UNIT 1C	40514	KU
ZANWYNN STATION UNIT 2	40514	KU
5742 RICHMOND RD	40515	KU
COVE LAKE SUBDIVISION UNIT 2	40515	KU
DENTON FARM UNIT 1G	40515	KU
DENTON FARM UNIT 4A	40515	KU
DENTON FARMS PH 3 SEC A	40515	KU
DENTON FARMS UNIT 1C	40515	KU
DENTON FARMS UNIT 1D	40515	KU
DENTON FARMS UNIT 1E	40515	KU
DENTON FARMS UNIT 1F	40515	KU
DENTON FARMS UNIT 2A & 3A	40515	KU
DENTON FARMS UNIT 2B & 3B	40515	KU
DENTON FARMS UNIT 2C & 4B	40515	KU
DENTON FARMS UNIT 2D	40515	KU
DENTON FARMS UNIT 2E	40515	KU
DUVALL CENTER	40515	KU
ELK LICK FALLS	40515	KU
HELLARD PROPERTY UNIT 1	40515	KU
HELLARD PROPERTY UNIT 2 SEC 1	40515	KU
HIGHLAND LAKES	40515	KU
HIGHLAND LAKES LOTS 1 THRU 4	40515	KU
HIGHLAND LAKES UNIT 1C	40515	KU
HIGHLAND LAKES UNIT 1D	40515	KU
HIGHLAND LAKES UNIT 1E	40515	KU
HIGHLAND LAKES UNIT 1F	40515	KU
HIGHLAND LAKES UNIT 1G	40515	KU
LANCASTER WOODS UNIT 6	40515	KU
MAHAN PROP LOT 1B	40515	KU
MAHAN PROP UNIT 1K	40515	KU
MAHAN PROP UNIT 1L	40515	KU
MAHAN PROPERTY UNIT 1-D	40515	KU
MAHAN PROPERTY UNIT 1-E	40515	KU
MAHAN PROPERTY UNIT 1-F	40515	KU
MAHAN PROPERTY UNIT 1-G	40515	KU
MAHAN PROPERTY UNIT 2-B	40515	KU
MCATEE RUN	40515	KU
OAK GROVE APART	40515	KU
PINNACLE	40515	KU
PINNACLE LOT 1	40515	KU
PINNACLE UNIT 2-A	40515	KU
PINNACLE UNIT 2-B	40515	KU
PINNACLE UNIT 2-C	40515	KU
PINNACLE UNIT 2-D	40515	KU
The Peninsula Apartments	40515	KU
THE RAQUET CLUB	40515	KU
TREVEY PROPERTY LOT 1 & 2	40515	KU
TREVEY PROPERTY LOT 3 SEC 2	40515	KU
VILLAGE AT TATES CREEK UNIT 12A	40515	KU
VILLAGE AT TATES CREEK UNIT 12B	40515	KU
VILLAGE AT TATES CREEK UNIT 12C	40515	KU
VILLAGE AT TATES CREEK UNIT 12D	40515	KU
WATERFORD/MAHAN PH 2 SEC 1	40515	KU
WATERFORD/MAHAN PH 2 SEC 2	40515	KU
WATERFORD/MAHAN PH 2 SEC 3	40515	KU
WATERFORD/MAHAN PH 2 SEC 5	40515	KU
YATES PROPERTY UNIT 2C	40515	KU
YATES PROPERTY UNIT 2D	40515	KU
BRIAR HILL ROAD 4192	40516	KU

BRIAR HILL ROAD 5323	40516	KU
GLENNLAKE ESTATES UNIT 1	40516	KU
GLENNLAKE ESTATES UNIT 2	40516	KU
HALEY HILL ESTATES	40516	KU
NORTH LEXINGTON CHURCH OF CHRIST	40516	KU
NORTH POINTE UNIT 4-f	40516	KU
NORTH POINTE UNIT 4G	40516	KU
NORTH POINTE UNIT 5 SEC 2	40516	KU
NORTH POINTE UNIT 5 SEC 3	40516	KU
NORTH POINTE UNIT 6	40516	KU
OLD PARIS PLACE UNIT 1A	40516	KU
OLD PARIS PLACE UNIT 1B	40516	KU
OLD PARIS PLACE UNIT 1C SEC 1	40516	KU
WAGERS PROPERTY	40516	KU
WALNUT SPRINGS FARM	40516	KU
ARNOLD PROPERTY	40517	KU
BRIDLE CREEK APARTMENTS	40517	KU
CARRIAGE LANE ESTATES	40517	KU
CARRIAGE LANE UNITS 5A & 5B	40517	KU
CARRIAGE LANES ESTATES	40517	KU
COLEMAN PROPERTY	40517	KU
GLEN CREEK UNIT 3B SEC 1	40517	KU
GLEN CREEK UNIT 3B SEC 2	40517	KU
GLEN CREEK UNIT 3B SEC 3	40517	KU
KIRKLEVINGTON HILLS APARTMENTS	40517	KU
MILLCREEK SUBDIVISION	40517	KU
PARK HILLS SUBDIVISION	40517	KU
PARK PLACE APARTMENT	40517	KU
Patchen Place Unit 1 Lot 1	40517	KU
SAYRE CHRISTIAN VILLAGE PH 6	40517	KU
TATES CREEK VILLAGE	40517	KU
WILHITE UNIT 1B SEC 1	40517	KU
ARNOLD RIDGE	40601	KU
ARNOLD RIDGE SUBDIVISION SEC. 2	40601	KU
ARTHUR T HOLDER ESTATE	40601	KU
FOXLEY LANE TRACTS 1 & 2	40601	KU
KNOLL CREEK FARM	40601	KU
THE CONDOS AT DUCKERS	40601	KU
THE ENCLAVE AT SILVER LAKE	40601	KU
THE LINKS AT DUCKERS LAKE	40601	KU
THE MAPLES SEC 3	40601	KU
THE MAPLES SEC 4	40601	KU
AUTUMN OAKS	40701	KU
BRADFORD PARK PH1	40701	KU
BRADFORD PARK PH2	40701	KU
CORLON PINES	40701	KU
FAWN VALLEY ESTATES	40701	KU
HOPEWELL ESTATES PH 2	40701	KU
LOVE'S TRAVEL STOP	40701	KU
SADDLEBROOK PARK	40701	KU
SCHOOL HOUSE APARTMENTS	40701	KU
SWEET HOLLOW ESTATES	40701	KU
TIMBERLAND FOREST PH 2	40701	KU
BOARDWALK TRAILOR PARK	40741	KU
COMMUNITY CHRISTIAN CHURCH	40741	KU
COUNTRY FARM APARTMENTS	40741	KU
EAGLE PROFESSIONAL OFFICE PARK	40741	KU
EMMA ESTATES	40741	KU
FERNWOOD	40741	KU
HAMPTON HILLS	40741	KU
LAUREL COUNTY FISCAL COURT	40741	KU

SOUTHSIDE PLAZA	40741	KU
THE BACHO DEVELOPMENT INC PH 1	40741	KU
DOGWOOD HILLS	40744	KU
DOGWOOD HILLS PH 2	40744	KU
ELK RUN ESTATES	40744	KU
GOLDEN EAGLE ESTATES PH 2	40744	KU
GOLDEN EAGLE ESTATES PH1	40744	KU
GOLDENROD	40744	KU
HARDIN HERITAGE	40744	KU
LILY INDUSTRIAL PARK	40744	KU
MHP, THE LAURELS PH 1	40744	KU
MHP, THE LAURELS PH 2	40744	KU
SUNNY MEADOWS	40744	KU
SHELLEY SUBDIVISION	40769	KU
AMBLESIDE-KINGSRIDGE	40965	KU
BRUSH MOUNTAIN PH 1	40965	KU
BRUSH MOUNTAIN PH 2	40965	KU
Southwood Estates Stage 2	40965	KU
LAYCOCK PROPERTY	41002	KU
STEVE KLUMP PROPERTY	41002	KU
LYTLE HOUSTON	41006	KU
3 COURTS SUBDIVISION	41008	KU
BISHOP TRACE	41008	KU
DESHA POINT UNIT 1	41031	KU
GRAND	41031	KU
LEBUS PROPERTY	41031	KU
FLEMING COUNTY INDUSTRIAL PARK	41041	KU
BILLY & MILLIE	41045	KU
CREEKSIDE VILLAGE PH 2 (GHENT)	41045	KU
BARRY CROSSING PH 1	41056	KU
CEDARWOOD ESTATES	41056	KU
CEDARWOOD ESTATES UNIT 6	41056	KU
EDGEFIELD TOWNHOMES	41056	KU
ELMCROFT ESTATES	41056	KU
HORIZON ESTATES PH 3	41056	KU
LIMESTONE VILLAGE	41056	KU
MAPLE RIDGE HOME	41056	KU
PARRY PLACE PH 3	41056	KU
PARRY PLACE PH 6	41056	KU
SLACK PIKE ESTATES	41056	KU
WASHINGTON'S GLEN	41056	KU
WHITSAM ACRES UNIT 3	41056	KU
WINDRUSH FARM ESTATES	41056	KU
WOOD LANE VILLAGE	41056	KU
ASBURY POINTE PH 2 & 3	41095	KU
BLUE HERON PH 1	41095	KU
MEADOW CREEK TOWNHOMES	41095	KU
BELL HOLLOW	42038	KU
BELL HOLLOW PH 2	42038	KU
LION POINTE	42038	KU
SODEN HILLS	42038	KU
WEST KY TECHNOLOGY PARK	42053	KU
HAZELWOOD ESTATES	42056	KU
CULLIN ESTATES	42064	KU
PENN CREST ESTATES	42064	KU
DEER HAVEN	42086	KU
BRIARWOOD	42320	KU
GOSHEN MEADOWS	42320	KU
GOSHEN MEADOWS	42320	KU
TWIN CITY UNIT 1-B	42320	KU
TWIN CITY UNIT 1C	42320	KU

TWIN CITY UNIT 1D	42320	KU
TWIN CITY UNIT 1E	42320	KU
MAPLEWOOD	42325	KU
BEND OF THE GREEN SEC 1	42330	KU
BROWN MEADOWS	42330	KU
CHERRY HILL POINT PH 2	42330	KU
CHERRY HILL POINT PH 3	42330	KU
DANNY BYARS PROPERTIES	42330	KU
MHP, WILLOW CREEK	42330	KU
MHP, WILLOW CREEK PH 2	42330	KU
PEACH TREE PLACE	42330	KU
SANDY HILL APARTMENTS	42330	KU
TAMMY TERRACE	42330	KU
FOX RUN SUBDIVISION	42345	KU
FOXBORO ADD 1 SUBDIVISION	42345	KU
FOXBORO PH 3	42345	KU
KENTWOOD SUBDIVISION	42345	KU
PARADISE COURT	42345	KU
THE NORTH WOODS	42345	KU
WOODLAND ESTATES	42345	KU
PAYTON PLACE	42347	KU
DEEPWOOD ESTATES	42420	KU
FOX RUN	42420	KU
HIGHLANDER ACRES	42420	KU
ABBOTTS WOOD HILLS	42431	KU
BROOKSHIRE ESTATES	42431	KU
COUNTRY CLUB ESTATES	42431	KU
ELK CREEK 4	42431	KU
ELK CREEK VILLAGE	42431	KU
ELK CREEK VILLAGE 1	42431	KU
ELK CREEK VILLAGE 2A	42431	KU
FAIRWAY ESTATES	42431	KU
GLENVIEW SUBDIVISION	42431	KU
HUNTINGTON RIDGE	42431	KU
ISLAND FORD INDUSTRIAL PARK	42431	KU
ISLAND FORD INDUSTRIAL PARK PH 3	42431	KU
Madisonville Piecemill	42431	KU
MHP, ELK CREEK VILLAGE	42431	KU
NORTH RIDGEWOOD	42431	KU
OAKWODD HILLS	42431	KU
OAKWODD HILLS	42431	KU
PARKWAY CROSSING	42431	KU
PENNYRILE INDUSTRIAL PARK	42431	KU
PENNYRILE PARTNERS	42431	KU
RIDGEWOOD ADDITION 2	42431	KU
RIDGEWOOD MEADOWS	42431	KU
SEXTANT LAND AND MINERAL CO.	42431	KU
SINGLE FAMILY LOTS	42431	KU
THE COURSES-BACKSIDE	42431	KU
THORN HILL	42431	KU
WEXFORD FARMS	42431	KU
WINDING CREEK	42431	KU
ROLLING ACRES	42459	KU
EVENING SHADE PLANTATION	42503	KU
HAM STREET PROPERTY	42503	KU
MEDICAL PARK OF LAKE CUMBERLAND	42503	KU
SOMERSET THUURMAN RD SITE	42503	KU
THE PINES	42503	KU
TWIN LAKES SEC 2	42503	KU
SPECULATIVE VENTURES	42553	KU
BUTTERFLY RIDGE RESORT PHASE 1	42629	KU

LILY CREEK RESORT SEC C-D	42629	KU
LILY CREEK RESORT SEC E	42629	KU
LILY CREEK RESORT SEC F	42629	KU
LILY CREEK RESORT SEC H	42629	KU
PARK PLACE SUBDIVISION	42642	KU
REMINGTON SUBDIVISION	42642	KU
AMERICAN LEGION POST 113	42701	KU
ASHTON PARK SECTION #2	42701	KU
BRIGHT SIDE ESTATES	42701	KU
CLAYS POINTE	42701	KU
CLAYSVILLE LANDING PH 1	42701	KU
CLAYSVILLE LANDING PH 2	42701	KU
COUNTY CLUB GOLF HOMES	42701	KU
COWLEY CROSSING SEC 1	42701	KU
FEDERAL ESTATES SEC 4	42701	KU
FEDERAL ESTATES SEC 8	42701	KU
FIRESIDE ESTATES	42701	KU
HELMWOOD HEIGHTS SEC 5	42701	KU
HICKORY HILL	42701	KU
KEENELAND GARDENS LOT 26	42701	KU
LAKESHIRE SEC 1	42701	KU
LAKESHIRE SEC 3	42701	KU
LAKESHIRE SEC 4	42701	KU
LOCUST GROVE MANOR SUBDIVISION	42701	KU
MADISON PARK SEC 3	42701	KU
MILL STATION SEC 1	42701	KU
MILL STATION SEC 2	42701	KU
MILL STATION SEC 3	42701	KU
MILL STATION SEC 4	42701	KU
NICHOLAS RIDGE SEC 1	42701	KU
NICHOLAS RIDGE SEC 1 & 3	42701	KU
NICHOLAS RIDGE SEC 2	42701	KU
NICHOLAS RIDGE SEC 5	42701	KU
NORTH CENTRAL ACRES	42701	KU
PARKWAY BUSINESS CENTER	42701	KU
RADCLIFF HOSPITAL	42701	KU
ROANOKE CROSSING	42701	KU
SANDY SPRINGS SECTION 1	42701	KU
SHAW CREEK ESTATES SEC 1	42701	KU
SKYLINE HEIGHTS SEC 2	42701	KU
SPORTSMAN ROAD ESTATES	42701	KU
STONEBROOK SEC 1	42701	KU
STONEBROOK SEC 3	42701	KU
THOUSAND OAKS SEC 1 & 2	42701	KU
THOUSAND OAKS SEC 3	42701	KU
THOUSAND OAKS SEC 4	42701	KU
TRIPLE CROWN ESTATES SEC 1	42701	KU
TRIPLE CROWN ESTATES SEC 2	42701	KU
TRIPLE CROWN ESTATES SEC 3	42701	KU
UNIVERSITY ESTATES SEC 1	42701	KU
UNIVERSITY ESTATES SEC 2	42701	KU
UNIVERSITY ESTATES SEC 3	42701	KU
UNIVERSITY ESTATES SEC 4	42701	KU
UNIVERSITY ESTATES SEC 6	42701	KU
WHISPERING WOODS SEC 2	42701	KU
WINDING SPRINGS SEC 1	42701	KU
WOBURN PLACE SEC 1	42701	KU
BLUEGRASS ESTATES	42718	KU
COX COVE	42718	KU
LAKESHIRE SUBDIVISION	42718	KU
NORTHLAND	42718	KU

HABERSHAM	42724	KU
HABERSHAM SEC 1	42724	KU
LAKWOOD SUB SEC 3	42724	KU
RANCH HOLLYWOOD SEC 1	42724	KU
RANCH HOLLYWOOD SEC 3	42724	KU
ROLLING GREENS SEC 1	42724	KU
CRAIG FARM SUBDIVISION	42740	KU
BAKK CREEK ESTATES PH 1	42748	KU
BLUEGRASS ESTATES (HODGENVILLE)	42748	KU
HODGENVILLE INDUSTRIAL PARK	42748	KU
KC ESTATES PH 1	42748	KU
KC ESTATES PH 2	42748	KU
KC ESTATES PH 3	42748	KU
GENTRY	42749	KU
CLAYTON STATION	42765	KU
AMBER FIELDS	42776	KU
AMBER FIELDS SUB SEC 2	42776	KU
AMBER FIELDS SUB SEC 2	42776	KU

KENTUCKY UTILITIES COMPANY

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Question No. 4

Responding Witness: Robert M. Conroy / William Steven Seelye

- Q-4. In response to MA-KFTC-KSES DR1, Q 41a (pg. 71 of pdf) the company appears to reject the premise that increases in the Basic Service Charge discourage energy efficiency. Please clarify:
- a. Does the company agree that as the fixed Basic Service Charge becomes a higher proportion of the bill then the customer's financial pay-off for using less energy, and for investing in energy efficiency, declines?
 - b. Does the company agree that conserving energy resources is a principle that should factor into utility rate making? If not, why not.
- A-4. To clarify, the Company rejected the premise of the cited data request because it was argumentative and inaccurate: "How continual increases in the Basic Service Charge (already it has doubled since 2013), which create poor price signals and discourage energy efficiency and investment in efficiency upgrades" As expressed in response to the cited request, the Company's view is that the purpose of the Basic Service Charge is to recover customer related costs that do not vary with usage through a charge that does not vary with usage. This helps prevent customers' energy rates from being further loaded with fixed-cost recovery, which in turn gives customers the benefit of more accurate incentives—not "poor price signals," but accurate price signals—to invest in energy efficiency at levels that are economically rational based on the underlying costs.
- a. Moving fixed cost recovery from charges that vary with usage, particularly energy charges, to the Basic Service Charge, will tend to reduce energy charges (at least relatively). Although that reduces incentives for energy efficiency (again, at least relatively), it also results in more accurate, cost-based incentives for energy efficiency.
 - b. In Kentucky, utility rates are required to be fair, just, and reasonable.³ There is no legal requirement that rates be structured to encourage conservation.

³ See KRS 278.030(1); KRS 278.270.

KRS 278.285 allows utilities to establish cost-effective demand-side management and energy efficiency (“DSM-EE”) programs, but it does not create a general rate-making principle or directive that utility rates should be formulated to encourage conservation per se. The Company has long had DSM-EE programs and has provided customers with information about how to save energy; the Company is not opposed to energy efficiency or conservation. But it is not a legally required ratemaking principle in KRS Chapter 278, and it is not a reason to continue to recover fixed costs through variable charges rather than the fixed Basic Service Charge.

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Question No. 5

Responding Witness: Robert M. Conroy

- Q-5. In Mr. Thompson's testimony he discusses the companies' concern for economic development (Section 3, pg. 13; PDF 15) and says that the companies "work tirelessly to empower business growth and expansion throughout Kentucky". In the companies' response to AG Initial Data Requests Questions 69 and 263, it is mentioned that economic development expenses are included in base rates because when businesses locate in the state this brings significant economic benefits to customers.
- a. Since reduction of fossil fuel emissions and of other adverse environmental impacts also bring significant economic benefits to the state through reduction of healthcare and environmental impact costs, why are avoidance or reduction of those adverse impacts not recognized and factored in when developing net metering tariffs? (as indicated in the companies' response to Sierra Club question 2c.) Since economic development, health, and environmental impacts are all "externalities," why is economic development recognized and factored into the rate request while health and environmental impacts such as carbon reduction are not factored in?
 - b. How does KU square their concern for economic development with their explicit rejection of economic development and job impacts as factors considered in developing the new net metering tariff (see response to MA-KFTC-KSES DR1, Q 22; pg. 37 PDF, in which here these are rejected as "externalities for the purpose of ratemaking in Kentucky").
 - c. How does KU square their concern for economic development with the negative impact that NMS-2 will have on the rooftop solar industry in Kentucky (since installation of panels will become less economical for residential and small business customers)? If the companies deny that the NMS-2 will have a negative impact on this industry, please explain why not and provide data to support this argument from other states that have reduced credit for energy fed to the grid.

A-5.

- a. Economic development, when successful, results in increased numbers of customers and usage of the Company's facilities and service, spreading the Company's costs over more customers and usage, and resulting in less need to increase rates. In other words, economic development can have a direct beneficial effect on the Company's rates. Moreover, insofar as economic development is considered in the Company's tariff, a customer under Rider EDR must cover at least its incremental cost of service and make some contribution to fixed costs. Economic development done this way is net beneficial for all customers.

In contrast, the health and environmental impacts—both positive and negative—are externalities to utility ratemaking unless and until they are priced into or become constraints upon the provision of service (e.g., through environmental regulations). The governmental bodies tasked with making those decisions do not include the Commission, as the Commission itself has previously recognized.⁴

- b. Economic development and job impacts that result from net metering are externalities to utility ratemaking in the same way that the adverse economic development and job impacts of compelling all other customers to pay excessive energy rates to net metering customers are externalities: they are too diffuse and uncertain to be accounted for in utility ratemaking. But if one side were to be taken into account somehow, e.g., the asserted economic development and job benefits purportedly resulting from net metering rates in excess of avoided cost, then the other side would, as well, i.e., the economic development and job cost of requiring hundreds of thousands of customers to overpay for energy for the benefit of net metering customers.
- c. See the response to b. above.

⁴ *Electronic Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of Certain Existing Demand-Side Management and Energy Efficiency Programs*, Case No. 2017-00441, Order at 28 (Ky. PSC Oct. 5, 2018) (“[The Commission] has no jurisdiction over environmental impacts, health, or other non-energy factors that do not affect rates or service.”). See also *The 2011 Joint Integrated Resource Plan of Louisville Gas and Electric Company and Kentucky Utilities Company*, Case No. 2011-00140, Order at 4 (Ky. PSC July 8, 2011) (“[I]ssues of environmental externalities, such as air and water pollution from generating electricity and mining fuel to supply the generating plants, are all issues beyond the scope of the Commission’s jurisdiction.”).

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Question No. 6

Responding Witness: Robert M. Conroy

- Q-6. Does KU agree that the length of time needed to recover a customer's investment in rooftop solar through credits against usage will significantly increase when moving from NMS-1 to NMS-2, since there would be a more than 2/3 reduction in the credit for energy fed to the grid with NMS-2?
- A-6. See the response to KSIA 2-13.

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Question No. 7

Responding Witness: Robert M. Conroy

- Q-7. Does KU agree that post-COVID-19, many solar owners work outside the home and cannot shift their usage to daytime hours?
- A-7. Regardless of whether such customers can shift their usage, they could use battery storage to shift their energy production to times when they do use energy. In addition, the Company believes the relevant question is not whether net metering customers can shift their usage, but rather how much all other customers should have to pay for the energy net metering customers provide to the grid.

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Question No. 8

Responding Witness: David S. Sinclair

Q-8. Referring to 02_MA_KFTC_KYSES_DR1_KU_Responses, In Q 1-2, Joint Intervenors asked what is the Company's projection for how NMS customer cumulative capacity would expand through 2025 under two scenarios: (1) If the NMS tariff remained in its current form with 1 for 1 netting at the retail rate, and (2) Under the proposed NMS-2 tariff? The Company states it did not run the scenario requested for the NMS-1 scenario.

a. Why did the Company not run the comparative scenarios, in light of the company's interest in economic development?

A-8. Economic development was not a consideration when the Companies were forecasting net metering. It is the Companies' understanding that solar panels are not currently manufactured in Kentucky.

As stated in response to PSC 3-34, the NMS-2 tariff is expected to reduce average array size but not materially impact the number of solar installations. Because solar panels are not manufactured in Kentucky, there would likely be no material impact on the Kentucky economy that would affect the Companies' rates.

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Question No. 9

Responding Witness: David S. Sinclair / William Steven Seelye

- Q-9. In 03-PSC-DR2_KU-Responses-Vol_2 of 2, question 108, the Company projects that if NMS-1 were to remain in effect and recent growth trends were to continue, the 1% cap on net metering would be reached in approximately 6 years. In contrast, in the NMS-2 scenario provided in response to Joint Intervenors Q2 (cited above), the Company projects that aggregate capacity will not reach 1% of system peak load by 2050.

Please provide a side-by-side comparison of the Company's projections for how the installed capacity of customer-generation would expand through 2050, in 5-year increments, under two scenarios: (1) with NMS-1 in effect through 2050 and (2) with NMS-2 taking effect in June 2021. Provide the projected annual growth rates of installed capacity for each scenario.

- A-9. The Company has not prepared a forecast of projected annual growth of installed capacity with only NMS-1 in effect through 2050.

The response to PSC 2-108 stated that in the past three years KU had experienced a 45% increase in the amount of net metering capacity on its system. This percentage increase was simply the average annual compound growth rate that KU had experienced during the most recent three-year period. KU did not characterize this percentage increase as a forecast or even as a projection. It was simply a trend in historical data and therefore cannot be considered a forecast or projection such as the more mathematically rigorous forecast of solar capacity described in Section 4.5 of the Companies' Electric Sales & Demand Forecast Process. (See Application Tab 16 – 807 KAR 5:001 Sec. 16(7)(c) B, at pp. 11-12.) The purpose of showing the trend was to demonstrate how quickly the amounts of subsidies provided by residential customers could increase if this trend were to continue.

Even without the introduction of NMS-2, it is unrealistic to expect that the amount of customer-generation capacity would continue to increase at a 45% annual growth rate for the next 30 years, as assumed by the question. However, to be responsive to the data request, the following table provides a comparison of

KU’s forecast of net metering capacity to the net metering capacity based on the historical trend. The table also shows the annual subsidies provided from non-net metering to net metering customers, based on the two levels of capacity.

Kentucky Utilities						
			NM Capacity Forecast Assuming Implementation of NMS-2		NM Capacity Trend Based on Growth Experienced in 2017 through 2020	
Year	Previous Year Forecasted Peak	1% Capacity	Forecasted Installed NM Capacity	Estimated Subsidy Provided to NM Customers Based on Forecast**	Installed NM Capacity Based on Historical Trend	Estimated Subsidy Provided to NM Customers Based on Trend***
(1)	(2)	(3)	(4)	(5)	(6)	(7)
2020	4352	43.52	5.73	\$46,399	5.71	\$245,153
2025	3891	38.91	8.56	\$69,315	36.60 *	\$1,571,366
2030	3819	38.19	9.14	\$74,012	234.59 *	\$10,072,035
2035	3780	37.80	9.71	\$78,627	1503.68 *	\$64,559,067
2040	3767	37.67	10.26	\$83,081	3767.00 *	\$161,732,286
2045	3763	37.63	10.80	\$87,454	3763.00 *	\$161,560,550
2050	3724	37.24	11.32	\$91,664	3724.00 *	\$159,886,125

* The projection shown in the table has not been limited to the 1% Cap. Instead, NM capacity is limited by the forecasted peak. The 1% cap would be reached by 2030.

** The subsidies shown in column (5) include only the intra-class subsidies from not charging a four-part rate (i.e., only the second subsidy identified in the response to PSC 2-108).

*** The subsidies shown in column (7) include the subsidies provided to NMS-1 customers for the energy they put on the grid (i.e., the first subsidy identified in the response to PSC 2-108) and the intra-class subsidies from not charging a four-part rate (i.e., the second subsidy identified in the response to PSC 2-108.)

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Question No. 10

Responding Witness: Robert M. Conroy

- Q-10. Referring to 02_MA_KFTC_KYSES_DR1_KU Response, Q3, Please clarify and clearly respond: For NMS-2 customers, will the credits produced by the net metering system be applied to offset surcharges which are based on kWh usage?
- A-10. For a Rider NMS-2 customer, each billing period the customer will be billed under the appropriate standard rate schedule and associated riders and cost-recovery mechanisms according to how much energy (and demand if the customer is on a demand rate) the customer used from the Company's system that billing period. The customer will also receive a dollar-denominated bill credit for all energy the customer produced to the Company's grid during that billing period. That bill credit will apply to offset any and all kinds of charges on the bill; it is simply a dollar amount to offset the bill amount, just like a payment received from the customer.

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Question No. 11

Responding Witness: David S. Sinclair / William Steven Seelye

- Q-11. For customers taking service under time-of-use rates,
- a. why does the Company charge higher rates for on-peak consumption versus off-peak consumption?
 - b. Does the Company or ratepayers derive any benefits from customers shifting consumption from on-peak to off-peak times? Please identify and describe all such benefits.
 - c. Please provide all analysis of the costs of service and cost of generation during on peak and off-peak times.
- A-11.
- a. The Company assumes this question concerns the Residential Time-of-Day Energy Rate (RTOD-E); the Company's other time-of-day rate schedules have demand rates that vary, but they do not have consumption (i.e., energy) rates that vary. The Company charges higher rates for on-peak consumption to send a price signal to customers to shift load from higher-use periods to lower-use periods on the system. The consumption, i.e., energy, price signal is not based on variable costs for RTOD-E; as shown in the Company's tariff, only the Infrastructure component, not the Variable component, differs between the two RTOD-E energy rates. Also, the Company's other time-of-day rates do not have different energy rates for on-peak versus off-peak periods because the Company's marginal cost of production does not vary significantly on average. This small difference is reflected in the Company's time-differentiated compensation rates under Rider SQF.
 - b. Customers benefit from shifting load because it potentially reduces the need for investments in generation (if the load shifting is durable) and for operation of higher fuel cost units, which would lower rates for all customers compared to what rates would be otherwise. But the benefit of shifting energy consumption versus demand is relatively small (see the response to a. above).

- c. For the Company's actual marginal cost of service for generation, see the response to MA-KFTC-KSES 1-13.

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Question No. 12

Responding Witness: Robert M. Conroy

Q-12. In reference to 02-MA-KFTC-KYSES-DR1_KU Responses, Q17, KU was asked "If a customer investing in solar submits a net metering application for NMS service before the NMS-2 service tariff is approved, but due to weather or other contingencies the system is not "operational" before NMS-2 service takes effect, would they be served under NMS-1 or NMS-2?"

The Company's response referred to "'02-KSIA_DR1_LGE_Responses" which states: "Under KRS 278.466(6), only those net metering customers whose eligible electric generating facilities are in service before the Commission approves Rider NMS-2 in this proceeding may take service under Rider NMS-1; all other net metering customers will take service under Rider NMS-2 regardless of their application date."

- a. Please respond whether the hypothetical customer would be ineligible for NMS-1 and would be served under NMS-2.
- b. Would an eligible generator need to be "operational" before the NMS-2 tariff takes effect in order to qualify for NMS-1 service.
- c. If yes, how does the Company reconcile this answer with the statement in "04-KU-Customer Notice of Rate Adjustment," which states: "Rider NMS-1 will serve eligible electric generating facilities as defined in KRS 278.465(2) for which customers have submitted an application for net metering service before the effective date of rates established in this proceeding."
- d. Please respond as to whether it is accurate to say that, according to the "Customer Notice of Rate Adjustment," customers who submit an application for net metering service before the effective date of rates established in this proceeding will be eligible to take service under NMS-1 and receive the grandfathering protections as defined in KRS278.466?
- e. Just to be clear, please affirmatively clarify whether the threshold for determining a customer's eligibility to receive NMS-1 service – will be the

date of submittal of an NM application, as was stated in the “Customer Notice of Rate Adjustment,” or the date the system is placed in service. If it is the latter, when will KU publish an accurate “Customer Notice of Rate Adjustment” regarding that threshold date.

A-12.

a., b., & d. See the response to PSC 3-7.

c. & e. See the response to PSC 3-7. By its nature, an abbreviated notice cannot contain all of the information contained in a full notice, which is why the abbreviated notice directed its readers to the full notice, as well as to a copy of the complete proposed tariff.⁵ The full notice provided in this proceeding states in relevant part regarding the proposed availability of Rider NMS-1:

Available for service for any eligible electric generating facility as defined in KRS 278.465(2) owned and operated by a Customer-generator located on Customer’s premises that generates electricity using solar, wind, biomass or biogas, or hydro energy in parallel with Company’s electric distribution system to provide all or part of Customer’s electrical requirements, and for which the Customer has executed Company’s written Application for Interconnection and Net Metering before January 1, 2021. The generation facility shall be limited to a maximum rated capacity of 45 kilowatts.⁶

The full notice was complete, accurate, and consistent with the Company’s proposed tariff and the response to PSC 3-7. Therefore, the Company does not intend to publish a revised notice.

That the notice was sufficient for its intended purpose is evident by the number of diverse intervenors in this proceeding, including the intervenors making this request and the KYSEIA, who clearly have an interest in, and are asking questions regarding, the proposed net metering rates, terms, and conditions. It is therefore self-evident that an additional notice publication is entirely unnecessary and would be a poor use of customers’ funds.

⁵ See Company’s filing requirements at Tab 6, Exhibit A, pages 4-5, filed on Nov. 25, 2020.

⁶ See Company’s filing requirements at Tab 6, Exhibit C, page 29, filed on Nov. 25, 2020.

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Question No. 13

Responding Witness: Robert M. Conroy

- Q-13. From which customer classes were Economic Development Rider credits collected in years 2011 – 2020? For each year 2011-2020, what was the customer charge within each class for the EDR? For 2011 – 2020, identify how the funds collected via the EDR were used and who were the eligible and actual recipients of those funds.
- A-13. The Economic Development Rider (EDR) does not collect credits from customers, but rather provides a percentage reduction to the demand charge on a customer's monthly bill. As such, there are no customer charges or funds collected associated with the EDR. Also, see the response to Question No. 22.

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Question No. 14

Responding Witness: Lonnie E. Bellar

Q-14. Has the Company performed any analysis or given consideration to joining the Midcontinent Independent System Operator (MISO)?

Please provide all documents and analyses performed by or on behalf of the Company concerning the feasibility, costs, and/or benefits of joining MISO.

A-14. Yes, the Companies performed RTO membership analyses that considered the potential costs and benefits of joining MISO or PJM in 2012, 2018, and 2020. The analysis reports are publicly available in KU's previous filings with the PSC at the following links.

KU Response to AG 1-409 in Case No. 2016-00370

https://psc.ky.gov/pscecf/2016-00370/derek.rahn%40lge-ku.com/01252017012210/12-2016_AG_DR1_KU_%28VOL_10_-_Q375-Q409%29.pdf

KU Application – Exhibit LEB-2 2018 RTO Membership Analysis in Case No. 2018-00294

https://psc.ky.gov/pscecf/2018-00294/derek.rahn%40lge-ku.com/09282018074941/10_-_KU_Testimony_and_Exhibits_1_of_3.pdf

KU Analysis – 2020 RTO Membership Analysis in Case No. 2018-00294

https://psc.ky.gov/pscecf/2018-00294/rick.lovekamp@lge-ku.com/03312020100253/Closed/2_LGE_KU_2020_RTO_Analysis_Study.pdf

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Question No. 15

Responding Witness: David S. Sinclair / William Steven Seelye

- Q-15. Ref: Response to AG 2-114: What amount and percentage of forecasted load by class is projected to be provided to net metered facilities?
- A-15. For this response, "load provided to net metered facilities" is assumed to be energy consumed by net metering customers from the grid and excludes energy customer generators supply to the grid. The Companies do not forecast sales for net metering customers separately, so this information does not exist.

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Question No. 16

Responding Witness: David S. Sinclair / William Steven Seelye

Q-16. Ref: Response to AG 2-115: What amount and percentage of historical load by class was provided to net metered facilities?

A-16. For this response, "load provided to net metered facilities" is assumed to be energy consumed by net metering customers from the grid and excludes energy customer generators supply to the grid. See table below.

Rate	Energy Consumed by Net Metering Customers From Grid in 2020 (MWh, Billed)	Net Metering Percentage of Total Rate Class Billed Sales
RS	5,142	0.088%
RTOD	10	0.655%
GS	2,456	0.153%
PS	898	0.052%
TOD	4,229	0.078%

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Question No. 17

Responding Witness: David S. Sinclair / William Steven Seelye

- Q-17. Ref: Response to AG 2-141: How are loss factors used by the Company in calculating the proposed compensation rate for customer generation? Please explain in detail.
- A-17. The Companies' proposed compensation rates for customer generation are based on the forecasted marginal generation costs of the Companies' generating units. The dispatch of these units is forecasted to meet the Companies' forecasted energy requirements, which include the Companies' forecast of energy sales plus the applicable losses. See the response to AG-KIUC 1-172.

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Question No. 18

Responding Witness: David S. Sinclair

Q-18. Ref: Response to AG 2-179: The data provided in the response suggests that the Company experiences system peak demand often during hours when solar photovoltaic systems would typically be generating electricity.

- a. Please confirm whether the Company observes or believes there to be some coincidence, even if not perfect coincidence, between solar production and system peak demands.
- b. Please explain how any degree of coincidence between solar production and system peak demands is accounted for in the calculation of the compensation rate for customer generation.

A-18.

- a. The Companies' experience with their Brown Solar facility demonstrates that there is some coincidence between solar production and peak demand. The coincidence is imperfect and varies by month. Since Brown Solar went into service in 2016, during the hours of each year's seasonal peak system load, Brown Solar's output ranged between 43 percent and 81 percent of its maximum AC capability in the summer and between 0 percent and 9 percent in the winter.
- b. Rider LQF includes a capacity component in the compensation for customer generation, which is effective when the Companies have the potential to avoid adding new capacity. However, any coincidence between solar production and peak demand is not a factor in the compensation rate.

Rider SQF and the Solar Share Program do not include a capacity payment for customer generation. Any coincidence between solar production and peak demand is not a factor in the compensation rate, but the forecasted marginal costs of production during peak hours are included in the compensation rate.

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Question No. 19

Responding Witness: Lonnie E. Bellar / Robert M. Conroy

- Q-19. Ref: Response to AG 2-245 - Please explain how the Company evaluates the potential for distributed energy resources and non-wires solutions to avoid or defer planned transmission spending.
- a. What criteria are applied in such evaluation?
 - b. How is such potential calculated?
 - c. How are such potential benefits reflected in the calculation of the proposed compensation rate for customer generation?

A-19.

- a-c. The Company accounts for distributed energy resources when projecting load on each distribution circuit for distribution planning purposes, which in turn feeds into transmission planning. Although the Company has accounted for distributed energy resources in its transmission planning, such resources have had no effect on the Company's ten-year transmission project plan because they are de minimis relative to the loads served by the Company's transmission system.

Moreover, because distributed energy resources are intermittent, as-available resources that are required to be distributed rather than concentrated,⁷ the Company does not believe there would be any avoided transmission cost resulting from distributed energy resources even if the combined capacity of such resources totaled 1% of the Company's peak load. Therefore, Rider SQF rates (including the non-time-differentiated Rider SQF rate proposed to be used for Rider NMS-2) are based on avoided production costs and do not include potential avoided transmission costs.

⁷ See, e.g., *Development of Guidelines for Interconnection and Net Metering for Certain Generators with Capacity up to Thirty Kilowatts*, Case No. 2008-00169, Order Appx. A at 3 (Ky. PSC Jan. 8, 2009) ("For interconnection to a radial distribution circuit, the aggregated generation on the circuit, including the proposed generating facility, will not exceed 15% of the Line Section's most recent annual one hour peak load.").

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Dated February 5, 2021**

Case No. 2020-00349

Question No. 20

Responding Witness: John K. Wolfe

- Q-20. Ref: Response to AG 2-249 - Please explain how the Company justifies spending \$1million dollars and recovering that cost from customers without having conducted any cost-benefit analysis.
- A-20. As Mr. Wolfe describes in his testimony and in Exhibit JKW-1, the Companies are closely monitoring and planning for the proliferation of distributed energy resources (DERs) and the challenges they present to the electric distribution system. DERs rely on two-way power flow and require a number of new processes to manage diffuse generation assets, optimize the operational performance of the grid to maintain and enhance reliability, and perform novel monitoring and control functions. A DER Management System (DERMS) can perform these functions. Accordingly, as part of their normal capital investment planning process, which Mr. Wolfe describes on page 15 of his testimony, the Companies have planned for a relatively small investment in DERMS in the future to begin to meet the challenges posed by DER in the future. The Companies will continue to evaluate this project, as they do all projects, as part of their planning processes. Funding allocated for a DERMS application is included in the Companies' financial plan for 2025 but will not be spent before a cost-benefit analysis is performed in accordance with the Company's capital authorization procedures.

KENTUCKY UTILITIES COMPANY

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Case No. 2020-00349

Question No. 21

Responding Witness: John K. Wolfe

Q-21.

- a. Ref: Response to AG 2-252 - Please explain whether two-way electricity flow from distributed generation passes through any of the Company's substations.
- b. Please indicate whether the Company has had to install any backflow prevention equipment anywhere in its system due to injections from customer generation.
- c. Please explain what service or function will be performed by the proposed DERMS and the costs that the Company is currently experiencing as a result of energy injections from customer generation.

A-21.

- a. The Companies do not currently routinely experience reverse power flow through substations. However, as mentioned in the response to AG 2-252, in the correct weather and load conditions, reverse power flow is possible in some substations where higher DER totals exist. This problem will only expand as DER is adopted.
- b. The Companies have not yet installed dedicated backflow prevention equipment due to customer generation.
- c. DERMS functionality on the Distribution Management System (DMS) will provide monitoring and control capability of DER installed on the electric distribution system. Having visibility of DER generation allows the DMS to better control existing grid assets resulting in better power quality, higher reliability, and increased DER hosting capacity. Control of DER generation will provide the Companies the ability to adjust inverter settings to optimize system voltage and reactive power flows, as well as increase DER hosting capacity.

The Companies are not experiencing additional costs as a result of energy injections from customer generation at this time.

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Case No. 2020-00349

Question No. 22

**Responding Witness: Daniel K. Arbough / Robert M. Conroy /
William Steven Seelye**

Q-22. Ref: Response to AG 2-263

- a. Please explain in detail the amounts revenue requirement associated with providing economic development assistance, in total, by year, and by customer class.
- b. Please compare this to the revenue and alleged cross-subsidy impacts of customer generation.
- c. Please explain how the Company justifies spending revenues from customers to obtain social externalities like payroll dollars, increased demand for housing, greater capital investment, a broader tax base and other non-electricity benefits.
- d. Please document with cost-of-service data how the costs of economic assistance specifically translate into economy expansion benefits and reduced costs of service for all customers.

A-22.

- a. It is assumed that the phrase "revenue requirement associated with providing economic assistance" refers to the economic development rider ("EDR") credits that the Company provides to large industrial or large commercial customers to locate in Kentucky. Economic development credits are provided in accordance with the guidelines established by the Commission in its Order in Case No. 327 dated September 24, 1990. All of the EDR contracts that the Company has entered into with large commercial and industrial customers have been filed with and accepted by the Commission.

In its Order, the Commission requires the utility to "demonstrate that it has adequate capacity to meet anticipated load growth each year in which an incentive tariff is in effect." (*Id.*, at page 2.) This requirement ensures that the revenue added by the EDR contract makes a contribution to the utility's

fixed costs and therefore has the effect of spreading fixed costs over a larger sales base, thus serving to benefit other customers. The Commission also requires the utility to demonstrate that “all variable costs associated with the transaction during each year that the contract is in effect will be recovered and that the transaction makes some contribution to fixed costs.” (*Id.* at page 2.) Furthermore, the Commission also requires the utility to demonstrate that “rate classes that are not a party to the transaction should be no worse off than if the transaction had not occurred.”

According to the “Economic Development Rate Contract Report” filed with the Commission in 2020, KU had a total of seven EDR contracts. These seven EDR customers added a total of \$196,907,439 in revenue to KU, with a marginal cost of only \$92,564,044, thus contributing \$104,343,395 toward KU’s fixed costs.

KU projects that it will provide \$2,645,376 in credits to its EDR customers during the test year.

- b. Unlike the payments made to net metering customers, the credits provided to EDR customers do not result in cross subsidies. Because the marginal revenues received from EDR customers exceed marginal costs, KU’s customers benefit from these customers locating in KU’s service territory. In addition to creating jobs and adding infrastructure, these EDR customers increase KU’s revenues, thereby benefitting all customers.

NMS-1 customers, on the other hand, are being subsidized by other customers. Because the compensation that NMS-1 customers receive for the energy they put on the grid exceeds KU’s avoided costs, NMS-1 customers are shifting costs and therefore causing an increase in the costs that must be borne by non-net metering customers.

While KU’s current EDR customers have provided a \$104,343,395 net benefit to KU’s other customers, the current net metering service (NMS-1) imposes additional costs of \$245,153 on other customers. See response to PSC 2-108.

Therefore, in terms of cost recovery, EDR provides a net cost *reduction* to non-participating customers, whereas the Company’s current net metering service results in a net cost *addition* to non-participating customers.

- c. The Company does not engage in economic development efforts to obtain social externalities. The Company engages in economic development efforts to seek to grow its customer base and usage, which benefits all customers by spreading fixed cost over a larger sales base. See the response to Question No. 5.

- d. See response to part a above, which addresses how the marginal revenue from EDR customers exceeds the marginal cost of serving these new EDR customers and therefore contributes to relatively lower fixed costs paid by other customers.

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Case No. 2020-00349

Question No. 23

Responding Witness: William Steven Seelye

- Q-23. Ref: Response to KYSEIA 1-8 - Please explain the basis for asserting that Exhibit WSS-2 shows the cost to serve a residential distributed generation customer. Is the data based on a study of the cost of service for DG customers? If not, what supports the assertion?
- A-23. If the unit costs are calculated based on appropriate units, the costs for a DG customer are no different than for a non-DG customer. For example, the customer-related costs when unitized as a cost per customer would not be any different for a DG residential customer than for a non-DG residential customer. Likewise, the unit energy-related cost, calculated as a cost per kWh, would not be any different for a DG residential customer than for a non-DG residential customer. Furthermore, the demand-related unit costs, if calculated as a cost per kW of demand, would not be any different for a DG residential customer than for a non-DG customer. Therefore, with a properly designed four-part rate consisting of a Basic Service Charge, Energy Charge, Peak Demand Charge, and Base Demand charge, the rates for a DG and a non-DG residential customer would be the same.

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Question No. 24

Responding Witness: William Steven Seelye

Q-24. Ref: Response to KYSEIA 1-10 - Please reconcile the response to KYSIA 2-10, which states that interval data for 100 customers is insufficient to provide a representative sample and the categorical assertion in KYSEIA 1-8 concerning the cost to serve DG customers. That is, explain the Company's basis for asserting that the data in KYSEIA 1-8 "shows the cost to serve a residential distributed generation customer" when the interval data for 100 customers is insufficient to be representative.

A-24. Regarding the "categorical assertion in KYSEIA 1-8", see response to Question No. 23. When properly calculated using the appropriate billing units, the unit costs for a DG customer would not be any different from a non-DG customer. The unit costs of serving a DG customer – i.e., customer-related cost per customer, energy-related cost per kWh, peak demand cost per kW of peak demand, base demand cost per kW of base demand – would be no different than for a non-DG customer. See response to Question No. 23. The validity of the unit costs for DG customers do not depend on the sample size of the load data available to the Company.

Therefore, if the Company were to develop a four-part rate for residential customers, then any such a rate, if properly designed, would be equally appropriate for a residential DG customer or a non-DG customer. This does not imply, however, that a two-part rate should be the same for both DG customers and non-DG customers. With a two-part rate, different load factors for DG and non-DG customers would necessitate a higher rate for DG customers. But with a four-part rate, DG and non-DG customers could be charged the same rate.

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Case No. 2020-00349

Question No. 25

Responding Witness: Robert M. Conroy

Q-25. Ref: Response to KYSEIA 1-15 - Is it the Company's assertion in this response that AMI deployment will provide customers with the technical capability and data in real time in order to perfectly align--on an instantaneous basis--consumption with production? If not, what additional technology or action will be necessary to align production and consumption in real time and achieve full value for production in offsetting consumption?

A-25. No, that is not the Company's position, and the cited response did not state or imply that it was. As stated in response to KSIA 1-15(a), "A customer can align production with consumption primarily by selecting a type and size of renewable generating facility that is appropriate for the customer's consumption pattern. The customer could also add a battery system to store energy during times of excess production for later consumption." If interval-metered data would be helpful for customers to choose appropriately sized generating systems, as the request in KSIA 1-15(b) seemed to indicate, the Company's response to KSIA 1-15(b) states, "Customers in the Companies' AMS Opt-In program currently have access to interval metered data through the MyMeter portal and if the proposed AMI deployment is approved then that capability will extend to all customers that receive an AMI meter. The capability will become available as meters are deployed which generally occurs from 2022 to Q1 2026."

The Company does not believe real-time AMI data will assist customers to balance their production and load instantaneously; such data will be useful for other purposes, but that is not one of them. Rather, for net metering customers to get the best value for their investment, they should choose appropriately sized generating facilities (and appropriate types of generating facilities) for their usage patterns and consider whether investing in battery systems is advisable for their particular situations.

But these issues miss the more important point; namely, what is the appropriate rate for other customers to pay for intermittent, as-available energy from distributed generators? The Company's position is clear: other customers should pay only the truly avoided cost for that energy.

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Question No. 26

Responding Witness: Robert M. Conroy

- Q-26. Ref: Response to KYSEIA 1-17 - Please confirm that the Company's proposed tariff design eliminates all netting of consumption and production charges and credits over the billing period. If the Company does not agree, please explain how and the exact extent to which the proposed tariff design performs netting.
- A-26. The Company's proposed Rider NMS-2 comports with the definition of "Net Metering" contained in KRS 278.465(4) and as used in KRS 278.465 to 278.468:
- (4) "Net metering" means the difference between the:
- (a) Dollar value of all electricity generated by an eligible customer-generator that is fed back to the electric grid over a billing period and priced as prescribed in KRS 278.466; and
 - (b) Dollar value of all electricity consumed by the eligible customer-generator over the same billing period and priced using the applicable tariff of the retail electric supplier.

Under the proposed Rider NMS-2 and as explained in response to KYSEIA 1-17, the "netting", in accordance with the statute, is no longer based on a one-to-one (1:1) kilowatt-hour denominated energy credit and is in the form of a dollar-denominated bill credit (See KRS 278.466(4)).

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Question No. 27

Responding Witness: David S. Sinclair / William Steven Seelye

Q-27. Ref: Response to KYSEIA 1-19

- a. What availability factor (hours of actual production compared to hours of rated production as a ratio) does the Company estimate or observe for non-utility customer generation connected to its system?
- b. How do contracts change the actual operating performance of solar systems-
-the observed availability factor?
- c. Please provide the technical explanation of this effect.
- d. Please explain how a customer generator's desire to reduce their utility bill with self-generation results in a different availability factor than for non-utility generators operating pursuant to a wholesale sales contract with the Company.
- e. Please provide copies of data and citations to sources that the Company relies upon for its answers and explanations.

A-27.

- a. The Companies estimate an energy profile for customer solar in the development of the load forecast. The estimated monthly capacity factors are shown in the following table.

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
7.2%	10.0%	14.0%	18.5%	21.4%	23.6%	22.6%	21.1%	17.3%	12.6%	8.7%	6.3%

- b. The Companies' experience with their Brown Solar and Solar Share facilities demonstrates that solar equipment failures do occur, which can lead to diminished performance if not identified and addressed quickly. To address this potential issue with the Companies' planned purchase of the output from the Rhudes Creek Solar facility, the Power Purchase Agreement includes an

Availability Guaranty with the potential for liquidated damages to be paid in the case of nonperformance.⁸

- c. The Companies monitor their Brown Solar and Solar Share facilities in real time to compare the actual energy output with the expected output based on actual the solar irradiance and other conditions at these facilities.
- d. The Companies are not aware of individual customers' desires in this regard. But a customer's desire to reduce their electricity bill may conflict with their ability to afford or their desire to maintain and/or repair their solar equipment, especially because they would have no obligation to do so and may be unaware of their solar equipment's performance or operational status.
- e. See the response to part (b).

⁸ See Article 9 of the Power Purchase Agreement in Exhibit 1 of the Application and Exhibits filed with the PSC in Case No. 2020-00016 at https://psc.ky.gov/pscecf/2020-00016/rick.lovekamp%40lge-ku.com/01232020094922/4_-_Application_and_Exhibits.pdf.

KENTUCKY UTILITIES COMPANY

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Case No. 2020-00349

Question No. 28

Responding Witness: Robert M. Conroy / William Steven Seelye

- Q-28. Ref: Response to MHC/KFTC/KSES 1-24 - If the Company is not addressing alleged cross-subsidies or the costs to serve net metering customers in this proceeding, what is the Company's justification for proposing a net metering credit rate less than the full retail rate? Please explain.
- A-28. The question mischaracterizes what was stated in the response to MA-KFTC-KSES 1-24. The response did not state that the Company is not addressing cross-subsidies provided to net metering customers. What was stated in the response is: "It is important to emphasize that the Company is not addressing in this proceeding intra-class subsidies that are created by net metering customers not being served under a four-part rate."

As explained in its response to PSC 2-108 there are two subsidies related to serving net metering customers. The *first subsidy* is the overcompensation that is currently being provided to net metering customers under the current net metering rate (NMS-1) for the energy that the net metering customers supply to the grid. The Company is addressing this subsidy for new net metering customers with the introduction of NMS-2, which will compensate new net metering customers at avoided costs. Notably, the proposed compensation for excess energy under Rider NMS-2 is essentially the same rate the Company will pay for energy under the power purchase agreement for the 100 MW Rhudes Creek Solar facility's output ("Solar PPA") net of anticipated revenues from renewable energy certificate sales. The Company is proposing to compensate Rider NMS-2 customers at that level notwithstanding that the Solar PPA includes a 20-year term, an availability guaranty, and liquidated damages if the facility is not available according to the guaranty, none of which net metering provides.⁹

But as also explained in its response to PSC 2-108, the Company is not addressing a second type of subsidy that relates to the reduction in load factor created by the

⁹ See *Electronic Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Approval of a Solar Power Contract and Two Renewable Power Agreements to Satisfy Customer Requests for a Renewable Energy Source under Green Tariff Option #3*, Application Exh. 1 (Ky. PSC Jan. 23, 2020).

installation of behind-the-meter generation. The Company has a limited amount of load research data for net metering customers that indicates those customers have significantly lower load factors than non-distributed generation customers. This second subsidy could be addressed with the introduction of a four-part rate. The Company intends to collect more load research data in order to further study the implementation of four-part rates that would address the second type of subsidy.

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Question No. 29

Responding Witness: Robert M. Conroy

Q-29. In response to MA-KFTC-KSES DR1, Q 40 (pg. 70 pdf), which asked for examples of the new TOD rate designs that will be available with AMI and examples of how these might save customers money, KU stated: “ No analysis related to these opportunities has been performed as this analysis requires interval customer usage data.”

Since no company data is available, please provide examples from other utilities of new rate designs allowed by AMI and provide evidence that these have led to energy use reductions and bill savings.

A-29. The Company has not researched in detail the specifics of other utilities' rate designs allowed by AMI or what the energy use effects those utilities have observed. Based on industry literature, knowledge, and information, the Company believes AMI will permit new TOD rate designs that if used correctly should save customers money. But as stated, the Company commits to offering innovative rate designs such as pre-paid and time-of-day rates after AMI is deployed in accordance with the Commission's August 30, 2018 Order in Case No. 2018-00005 (see page 15 stating, “The Commission strongly encourages the Companies . . . to consider prepay metering and real time pricing options to enhance the customer experience.”).

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Question No. 30

Responding Witness: Eileen L. Saunders

- Q-30. With reference to the WeCare program
- a. What percent of applicants to the WeCare program receive assistance?
 - b. Of those who are denied, what are the most common reasons for denial? (please give percentage of applicants in this response).
 - c. The companies state that the WeCare plus program will not be implemented because the partner in this program did not receive funding. Does the company have any plans to find other partners or other sources of revenue for this program? If not, why not?
- A-30.
- a. Eighty-six percent (86%) of all applicants received assistance in 2020.
 - b. Applicants who did not receive assistance were: unresponsive to attempts to schedule assessments (96%); landlord did not grant consent for work to be performed (3%); the customer did not meet income eligibility requirements (1%).
 - c. Yes. The Company plans to continue working with Midwest Energy Efficiency Alliance (MEEA) to strengthen and submit another application for funding through the Federal Home Loan Bank (FHLB) in 2021. The Company will also explore additional opportunities and partnerships with state, local, and federal entities, or other private sector resources.

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Question No. 31

Responding Witness: Eileen L. Saunders

- Q-31. With reference to the Home Serve Protection Plan,
- a. what percent of customers have needed to repair customer-owned equipment, and what has been the average cost of those repairs?
 - b. In offering this plan to customers, will the companies provide data on the percent of customers that have needed repairs, and the average cost?
- A-31.
- a. LG&E/KU collectively have approximately 2,000 – 3,000 customers who require repairs to their exterior electric line each year that could include repair/replacement of service panel, meter base as well as the exterior service line (overhead riser, weatherhead, service conductors – LG&E/KU or Underground service conductors for LG&E only). The Companies do not track how much the customer spends for repairs to the portion of the equipment that is their responsibility.
 - b. LG&E/KU will continue to track the number of customers who require repairs to their exterior electric line. LG&E/KU are requesting approval of the tariff to bill and collect for Home Services Protection Plan. HomeServe USA will offer the Companies' customers the voluntary exterior electric equipment protection plan.

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Case No. 2020-00349

Question No. 32

Responding Witness: Eileen L. Saunders / David S. Sinclair

- Q-32. What are the companies' plans for their own solar installations in the next 6-10 years?
- A-32. The Companies plan to continue operating their existing Brown solar facility, Solar Share Facilities, and two business solar facilities. The Companies are currently in the process of constructing the third and fourth phases of the Solar Share Facilities, which are expected to be operational in May 2021. The Companies will further expand the Solar Share Program and business solar program as warranted by customer demand. The Companies plan to purchase the output from a 100 MW solar facility for twenty years starting in 2022. The Companies have also issued a request for proposals for capacity and energy resources, which could include proposals for additional solar resources.

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Question No. 33

Responding Witness: Eileen L. Saunders

Q-33. In response to MA-KFTC-KSES DR1, Q-31 (pg. 52 of pdf) the company states that a PAYS-type program did not score well on the Total Resource Cost (TRC) test, and referenced other cost/benefit test scores as well.

Please clarify:

- a. What was the underlying residential usage data that was used for these analyses? Please provide this data to the joint interveners in an anonymized format, identified by zip code.
- b. Electric usage data used for the analysis, or if not, electric usage data for ratepayers in general. Please include any information on the size of these residences as well, if available.
- c. Energy intensity data used for the analysis, or if not, energy intensity data for the ratepayers in general.
- d. Energy burden data used for the analysis, or if not applicable, energy burden data for ratepayers in general.
- e. Does the company agree that the TRC is an inappropriate metric on which to evaluate a PAYS-type program, since it does not account for cost recovery for site-specific investments, resulting in no net costs for the energy retrofits?
- f. Does the company agree that the Utility (PAC/UCT) Test is the appropriate metric for evaluating a PAYS-type program, and confirm that your presented score of 3.57 on that test is an indicator that a PAYS-type program would be beneficial to ratepayers, participants, and investors alike?
- g. Given the fact that the Kentucky Public Service Commission, along with regulators in other southeastern states such as Arkansas, Tennessee, and North Carolina have already approved PAYS-type programs, and the fact that the PAYS program run by Ouachita Electric even passed the RIM test, can you

document the discrepancies between these examples and the numbers presented for your own cost/benefit tests as presented?

A-33.

- a. The average residential KU load shape data by month and hour is incorporated into the DSMore cost-benefit model and was used for this analysis.¹⁰ See the attached file of load shapes as pulled from the DSMore tool. Note, the model does not utilize the data by zip code.
- b. The usage data utilized in the analysis was the residential load shape which pertains to average usage across the rate class. Residence size was not utilized. Also see the response to a. above.
- c. See the response to a. above.
- d. See the response to a. above.
- e. No. The TRC score is an appropriate metric for this evaluation because it is an industry recognized method and has been used to evaluate DSM offerings for many utilities in many DSM cases over the years, including those filed with the Kentucky Public Service Commission.

The TRC test is certainly not the only relevant test, but it is an important means of analyzing a program of like PAYS because it treats the utility and its customers as a whole, a single system. It asks whether the total system is better off for making the expenditures or incurring the costs, regardless of who makes or incurs them, for the savings that result to the system.

- f. No. See Case No. 2017-00441, Exhibit GSL-1, page 21 and 22 of 182 for a description of the various tests and commentary. As mentioned in the reference, the TRC test is the most comprehensive indicator of the value of a DSM offering to a utility and its customers. Also note that the Utility (PAC/UCT) test score of 3.57 that was provided in the analysis only included the audit fee of \$575 paid by the utility to the project assessor, but did not include any other utility administration costs (i.e. IT setup costs, program labor, etc.) to offer and run the program.

Notably, in the example used, adding just \$1,500 of administrative cost—about \$220/year over the seven years of the repayment term—would cause the PAC/UCT score to fall below 1.00. In other words, if a pilot PAYS-type program for 100 customers had annual administrative costs of more than \$22,000, which it likely would, the PAC/UCT score would be less than 1.00.

¹⁰ DSMore is a software package from Integral Analytics, Inc. that performs cost-benefit calculations for various energy efficiency measures and programs.

- g. Each utility's underlying economic (avoided energy and capacity costs) and financial inputs are very different and can change over time. Further, other states' utility commissions use different tests to ascertain what programs are offered or are beneficial.

Incoming DSMore		Weekday Hours				Weekday Hours				Weekday Hours				Weekday Hours											
Load Shape		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Pre	Apr	0.91	0.92	0.93	0.97	1.08	1.21	1.29	1.33	1.27	1.19	1.16	1.12	1.10	1.07	1.13	1.22	1.33	1.42	1.46	1.48	1.45	1.32	1.18	1.08
Spring	May	0.79	0.75	0.72	0.73	0.81	0.91	1.00	1.01	1.02	1.04	1.04	1.07	1.11	1.16	1.24	1.36	1.50	1.61	1.62	1.57	1.50	1.35	1.15	0.99
Summer	Jun	1.17	1.07	0.98	0.93	0.93	0.98	1.04	1.12	1.17	1.25	1.42	1.57	1.79	1.93	2.05	2.17	2.31	2.33	2.27	2.16	2.01	1.81	1.56	1.38
	Jul	1.28	1.18	1.09	1.03	1.01	1.03	1.07	1.17	1.22	1.34	1.58	1.81	1.96	2.15	2.31	2.49	2.62	2.66	2.60	2.45	2.28	2.04	1.75	1.49
	Aug	1.11	1.04	0.98	0.98	0.98	1.02	1.04	1.09	1.20	1.29	1.45	1.62	1.83	1.99	2.17	2.32	2.41	2.45	2.40	2.25	2.02	1.79	1.52	1.31
	Sept	0.90	0.85	0.81	0.81	0.87	0.94	1.00	0.97	0.95	0.98	1.04	1.11	1.17	1.27	1.50	1.68	1.91	1.97	1.94	1.82	1.67	1.53	1.34	1.15
Pre	Oct	0.79	0.79	0.79	0.84	0.96	1.08	1.16	1.13	1.09	1.04	1.00	0.96	0.94	0.94	0.99	1.13	1.28	1.36	1.43	1.41	1.35	1.20	1.06	0.97
Fall	Nov	1.17	1.16	1.14	1.16	1.23	1.37	1.50	1.55	1.55	1.47	1.39	1.29	1.20	1.14	1.09	1.13	1.26	1.44	1.57	1.61	1.59	1.52	1.42	1.34
Winter	Dec	1.65	1.64	1.63	1.66	1.74	1.89	2.05	2.12	2.13	2.08	1.95	1.86	1.76	1.70	1.65	1.71	1.86	2.06	2.21	2.22	2.20	2.15	2.05	1.95
	Jan	2.22	2.22	2.22	2.26	2.34	2.50	2.64	2.72	2.73	2.68	2.58	2.42	2.29	2.17	2.10	2.11	2.25	2.46	2.64	2.72	2.66	2.58	2.44	2.35
	Feb	1.82	1.83	1.83	1.88	1.97	2.11	2.24	2.30	2.24	2.18	2.07	1.91	1.79	1.68	1.63	1.65	1.79	1.98	2.12	2.20	2.21	2.16	2.04	1.95
	Mar	1.32	1.33	1.32	1.39	1.51	1.67	1.78	1.84	1.75	1.61	1.51	1.41	1.34	1.29	1.30	1.35	1.45	1.55	1.65	1.73	1.73	1.67	1.57	1.49

Incoming DSMore		Weekend Hours				Weekend Hours				Weekend Hours				Weekend Hours											
Load Shape		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Pre	Apr	0.90	0.91	0.92	0.95	1.05	1.18	1.26	1.31	1.25	1.19	1.15	1.12	1.10	1.07	1.13	1.22	1.33	1.42	1.47	1.48	1.45	1.33	1.18	1.08
Spring	May	0.81	0.75	0.72	0.73	0.80	0.91	0.99	1.01	1.02	1.03	1.04	1.07	1.12	1.17	1.25	1.37	1.52	1.64	1.66	1.59	1.52	1.36	1.16	1.00
Summer	Jun	1.16	1.06	0.98	0.93	0.92	0.98	1.03	1.11	1.16	1.24	1.41	1.57	1.78	1.92	2.06	2.17	2.30	2.33	2.27	2.17	2.03	1.83	1.58	1.39
	Jul	1.29	1.17	1.08	1.03	1.00	1.02	1.06	1.16	1.20	1.32	1.58	1.81	1.97	2.16	2.33	2.51	2.63	2.67	2.61	2.47	2.29	2.05	1.75	1.49
	Aug	1.09	1.02	0.97	0.97	0.98	1.02	1.04	1.09	1.19	1.28	1.43	1.59	1.79	1.94	2.11	2.27	2.38	2.42	2.38	2.23	2.00	1.78	1.51	1.30
	Sept	0.93	0.85	0.81	0.81	0.87	0.95	1.00	0.96	0.94	0.97	1.03	1.10	1.16	1.27	1.51	1.69	1.92	1.99	1.96	1.85	1.67	1.53	1.35	1.16
Pre	Oct	0.79	0.79	0.80	0.84	0.96	1.08	1.16	1.14	1.09	1.05	1.01	0.97	0.94	0.95	1.00	1.14	1.29	1.37	1.44	1.42	1.36	1.22	1.07	0.98
Fall	Nov	1.23	1.19	1.19	1.21	1.27	1.41	1.54	1.58	1.57	1.47	1.37	1.28	1.18	1.12	1.07	1.11	1.25	1.43	1.56	1.59	1.57	1.49	1.40	1.32
Winter	Dec	1.66	1.61	1.60	1.63	1.70	1.84	2.00	2.08	2.09	2.04	1.90	1.81	1.70	1.64	1.59	1.65	1.81	2.02	2.16	2.18	2.15	2.11	2.01	1.92
	Jan	2.27	2.26	2.26	2.30	2.38	2.55	2.70	2.79	2.78	2.72	2.61	2.46	2.33	2.22	2.15	2.16	2.29	2.51	2.69	2.77	2.70	2.62	2.49	2.40
	Feb	1.87	1.90	1.91	1.98	2.08	2.23	2.36	2.42	2.35	2.28	2.15	1.95	1.82	1.71	1.66	1.68	1.83	2.03	2.17	2.25	2.26	2.21	2.09	2.00
	Mar	1.30	1.32	1.32	1.38	1.51	1.67	1.78	1.84	1.76	1.64	1.53	1.44	1.36	1.31	1.32	1.38	1.48	1.58	1.69	1.76	1.76	1.71	1.61	1.51

KENTUCKY UTILITIES COMPANY

**Response to Mountain Association, Kentuckians for the Commonwealth,
and Kentucky Solar Energy Society's Second Set of Data Requests
Dated February 5, 2021**

Case No. 2020-00349

Question No. 34

Responding Witness: Eileen L. Saunders

- Q-34. In Attachment to Response to MA KFTC KSES-1 Question No. 34 Page 5 of 8, the company states that "typical DSM program planning period of 7 years or less can limit the term period of the loan (sic) which could exceed the life of the program." Given that cost recovery for other utility investments are tied to the life of the investment (power plants, for instance) and can continue on for decades:
- a. Shouldn't cost recovery for DSM investments also be tied to the life of the installed measures?
 - b. Shouldn't the PAYS-type program be analyzed based on those terms?
- A-34.
- a. The Companies use the California Tests in the analysis of DSM related program evaluation as they provide industry standards for cost effectiveness, including consideration of the net present value of the benefits gained from the energy efficiency measure(s). The net present value calculation considers the potential useful life of the installed measures as the question suggests.
 - b. See the response to part a.

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Case No. 2020-00349

Question No. 35

Responding Witness: Eileen L. Saunders

- Q-35. It often takes years to fully investigate and implement new PAYS-based programs. For example, it took Mountain Association and its rural electric cooperative partners over 2 years to get from talks to the first retrofit completed for the HowSmartKY program in 2011. Given the speeds with which the landscape has shifted for utilities over the past decade:
- a. Would it not be prudent for the company to be learning about PAYS-type programs by experience, via a pilot program of around 500-100 homes/year, targeted to the renters and low-moderate income ratepayers that are historically unable to access more typical DSM offerings?
 - b. Shouldn't the company be prepared to consider if and how a PAYS-type program might offset the need for future investments in capacity, transmission, and distribution infrastructure?
- A-35.
- a. It is prudent and important for the Company to continuously learn about DSM-related programs and those that are beneficial for low-moderate income ratepayers. Our engagement with the DSM Advisory Group and the initiative taken by the Company to apply for federal grant dollars to expand coverage of the WeCare program are just two examples of how that is being done. In addition, the Company consulted with a Kentucky cooperative that has implemented a PAYS-type program and learned that the program was more difficult to setup than expected, and it is the Company's understanding that participation in such programs is very low across the state. A further evaluation of the PAYS program in the form of a pilot would require various setup costs, work processes, and personnel that could be significant, even to reach a small number of customers.
 - b. The Company has considered, and will continue to consider, measures that are beneficial to system operations and customers.

KENTUCKY UTILITIES COMPANY

Response to Mountain Association, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society's Second Set of Data Requests Dated February 5, 2021

Case No. 2020-00349

Question No. 36

Responding Witness: Lonnie E. Bellar / David S. Sinclair

Q-36. Given the global rush towards clean energy and the signals from the Biden administration regarding climate change initiatives and investments, shouldn't the companies be building the systems and infrastructures through which Kentucky might deploy such investments?

A-36. Decisions involving building the systems and infrastructures must continue to be least-cost. The Companies continuously monitor industry and regulatory conditions to ensure that they are positioned to meet customers' future demands and challenges. As Paul Thompson summarizes in his testimony, the utility industry as a whole faces increasing environmental restrictions and societal and market pressures to look toward more clean energy solutions, including renewables. And the Companies are in fact responding to those trends in a number of important ways. The Companies are evaluating their generating fleet mix to ensure that the end of economic life for older coal-fired generating units reflects the realities of current regulatory and societal conditions. That analysis has resulted in changes to the end of expected economic lives for several coal-fired generating units as discussed in Mr. Bellar's testimony and supporting exhibits. The Companies are also pursuing other initiatives aimed at growing renewable energy availability and consumption in Kentucky, including the recently approved 100 MW PPA with Rhudes Creek Solar, the Brown Solar generating facility, the Solar Share Program, and support and investment for modern electric vehicle charging stations on our roadways to meet anticipated growth in electric vehicle adoption.

In addition, neither the "global rush towards clean energy" nor any "signals from the Biden administration" necessitate having customers pay more than actual avoided cost for energy from net metering customers.

KENTUCKY UTILITIES COMPANY

**Response to Mountain Association, Kentuckians for the Commonwealth,
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Case No. 2020-00349

Question No. 37

Responding Witness: Lonnie E. Bellar / Robert M. Conroy / William Steven Seelye

- Q-37. Ref: Company response to AG 2-17- Please explain how and estimate the impacts on cost of service resulting from changes in air emissions standards (NAAQS). Please provide current and expected values in cents per kWh by customer class.
- A-37. The National Ambient Air Quality Standards are an array of emission standards, and their requirements change routinely. Therefore, it is not clear to which changes the request refers, and the Company has not estimated the impact on cost of service resulting from ongoing changes in NAAQS. The Company continues to monitor changes to NAAQS and other environmental requirements.

KENTUCKY UTILITIES COMPANY

**Response to Mountain Association, Kentuckians for the Commonwealth,
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Case No. 2020-00349

Question No. 38

Responding Witness: William Steven Seelye

- Q-38. Ref: Response to AG 2-19 - Please provide a detailed explanation with quantification of how generation retirement costs are allocated to customers, by customer class.
- A-38. In cost of service studies, generation retirement costs are allocated on the same basis as other fixed generation costs. In the LOLP study, generation retirement costs are allocated on the basis of an LOLP allocator described on pages 105-107 of the Direct Testimony of William Steven Seelye. Likewise, in the 12-CP and 6-CP cost of service studies, generation retirement costs are allocated on the basis of 12-CP and 6-CP allocators, respectively. Retirement costs are included in depreciation expense. The Company has not performed an analysis showing the class allocation of retirement costs broken out separately.