

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
INITIAL REQUESTS FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY**

Come now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and in accordance with the Public Service Commission's Order dated December 9, 2020, submits its Initial Requests for Information to Louisville Gas and Electric Company (LG&E).

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to LG&E's response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the LG&E witness who will be prepared to answer questions concerning the request during an evidentiary hearing.
- 3) These requests shall be deemed continuing so as to require further and supplemental responses if LG&E receives or generates additional information within the scope of these

request between the time of the response and the time of any evidentiary hearing held by the Commission.

- 4) If any request appears confusing, please request clarification directly from Counsel for KYSEIA.
- 5) To the extent that the specific document, workpaper, or information as requested does not exist, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.
- 6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.
- 7) If LG&E has any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for KYSEIA as soon as possible.
- 8) For any document withheld on the basis of privilege, state the following: Date; author; addressee; indicated or blind copies; all person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that any document called for has been destroyed or transferred beyond the control of LG&E, state: The identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the policy.
- 10) As LG&E discovers errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document to support any changes.

WHEREFORE, KYSEIA respectfully submits its Initial Requests for Information to LG&E.

Respectfully submitted,

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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 8th day of January 2021, and further certifies that the electronic version of the paper is a true and accurate copy of each paper filed in paper medium. Pursuant to the Commission's March 16, 2020, and March 24, 2020, Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus Covid-19*, the paper, in paper medium, will be filed at the Commission's offices within 30 days of the lifting of the state of emergency.

/s/ David E. Spenard
David E. Spenard

NOTICE REGARDING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David. E. Spenard
David E. Spenard

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
INITIAL REQUESTS FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY**

1. Reference: Direct Testimony of Company Witness Robert M. Conroy (“Conroy Direct”) at page 26 [PDF 408 of 447], line 10 through 17, discussing the Company’s energy credits rate under Rider NMS-2.
 - a. Identify the grandfathering (hereafter, “legacy”) period, if any, that will apply to the dollar denominated bill credit for a customer-generator taking service under NMS-2, if and when the Company subsequently implements changes to the Non-Time-Differentiated SQF rate in the future.
 - b. If there will be no legacy period, explain why not.
 - c. Describe the process by which the Company intends to update the compensation rate for energy credits under NMS-2 in the future and the anticipated frequency of changes to the compensation rate.

2. Reference: Conroy Direct at page 26 [PDF 408 of 447], line 18 through 20, stating “Are the Companies proposing any different rates or rate structures for new net metering customers under KRS 278.466(6)? A. Not at this time, though the Companies may do so in the future.”
 - a. Identify the legacy period, if any, that the Company intends to apply to rates or rate structures applicable to a customer-generator taking service under NMS-2, if and when the Company subsequently implements changes to NMS-2 rates or rate design.
 - b. If there will be no legacy period, explain why not.

3. Reference the Company’s proposed NMS-1 tariff (NMS-1, Net Metering Service-1, Sheet No. 57) [PDF 103 of 2359]. The NMS-1 tariff states, in pertinent part, “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.”
 - a. Please clarify whether the Company’s NMS-1 tariff will remain open during the pendency of this rate case and did not close to new customers as of January 1, 2021.

4. Reference the Company’s proposed NMS-2 tariff (Standard Rate Rider NMS-2, Net Metering Service-2, Sheet No. 58) [PDF 104 of 2359].

- a. The NMS-2 tariff states, in pertinent part, “The dollar denominated bill credit will be calculated by multiplying the total kWh of production within the billing period by the Non-Time-Differentiated SQF rate within tariff Sheet No. 55.”
 - i. Define “total kWh of production” for the purposes of this tariff.
 - ii. Explain how the Company will measure a customer’s “total kWh of production” for purposes of this tariff for customers both without a smart meter installed and customers with a smart meter installed.
 - b. The NMS-2 tariff states, in pertinent part, “The generation facility shall be limited to a maximum rated capacity of 45 kilowatts.” Describe how the Company will calculate the capacity of an eligible customer-generator’s system that comprises both a solar facility and a battery storage facility for purposes of determining whether the system is eligible for Net Metering services under NMS-2.
 - c. Confirm whether the “DATE EFFECTIVE” of the NMS-2 tariff refers to the date by which an eligible customer must submit a completed Net Metering application to the Company in order to be eligible for service under NMS-1, or describe in detail what the effective date of NMS-2 refers to if this is not the case.
5. Reference: Direct Testimony of Company Witness William Steven Seelye (“Seelye Direct”) at page 41 [PDF 45 of 491], lines 18 through 22, stating, “Eligible electric generating facilities for which the Companies’ written Application for Interconnection and Net Metering have been executed prior to the date new rates take effect will be grandfathered for 25 years under the Companies’ current rate schedule for Net Metering Service, which will be renamed Net Metering Service – 1 (NMS-1).”
- a. Describe how LG&E will identify and track legacy net metering facilities under NMS-1 over the 25-year legacy period, including how the Company will ensure legacy systems will continue to be served under NMS-1 if the customer-generator’s premises are sold or conveyed during the applicable 25-year period.
 - b. Describe how LG&E will apply the legacy period to an existing customer-generator taking service under NMS-1 who subsequently adds additional eligible capacity to the existing net-metered facility prior to the effective date of NMS-2, provided that the expansion of the customer-generator’s existing facility does not increase the total capacity to more than 45 kilowatts.
 - c. Describe how LG&E will apply the legacy period to a customer-generator taking service under NMS-1 who subsequently adds additional eligible capacity to the existing net-metered facility after the effective date of NMS-2, provided that the expansion of the customer-generator’s existing facility does not increase the total capacity to more than 45 kilowatts.
 - d. Describe how LG&E will apply the legacy period to a customer-generator taking service under NMS-1 who subsequently adds additional capacity to the existing net-metered facility after the effective date of NMS-2, provided that the expansion

of the customer-generator's existing facility does increase the total capacity to more than 45 kilowatts.

- e. Describe how LG&E will apply the legacy period to a customer-generator taking service under NMS-1 who subsequently adds a battery energy storage system to the existing net-metered facility after the effective date of NMS-2.
 - f. Describe how LG&E will apply the legacy period to a customer-generator taking service under NMS-1 who repairs or replaces components, such as a solar panel, of the existing net-metered facility after the effective date of NMS-2.
 - g. Explain under what circumstances, if any, an eligible customer-generator submitting an application to LG&E for Net Metering Service prior to the effective date of NMS-2 will be permitted to subsequently amend, supplement, or correct their net metering application after the effective date of NMS-2 without becoming ineligible for service under NMS-1.
6. Reference: Rider SSP governing the Companies' Shared Solar Program [PDF 121 of 2359]. Rider SSP provides a guarantee that a customer can participate in the program for 25 years if they elect the one-time solar capacity charge. Please explain the rationale behind providing a 25-year guaranteed enrollment term for these customers.
7. Reference: Seelye Direct at page 47 [PDF 51 of 491] lines 1- 5 stating "The Companies are choosing not to develop cost-based rates designed specifically for distributed generation customers at this time, but the Companies plan to continue to evaluate the use of cost-based rate designs, such as four-part rates that include a customer charge, energy charge, peak demand charge, and base demand charge, to serve distributed generation customers."
- a. For the purposes of this statement, do "distributed generation customers" include customers that participate in the Shared Solar Program Rider under Rider SSP?
 - b. Does the Company believe that the Rider SSP methodology for determining the Solar Energy Credit using 15-minute duration load and production matching methodology (i.e., virtual netting of production and load) provides a subsidy to Rider SSP participants equivalent to any alleged subsidy associated with physical service of on-site load by distributed generation customers?
8. Reference: Seelye Direct, page 46 [PDF 50 of 491], lines 1 through 5, stating "The Companies are choosing not to develop cost-based rates designed specifically for distributed generation customers at this time..." and page 47 [PDF 51 of 491], lines 10 through 13, stating "The Companies' proposal represents a gradual movement toward implementing a cost-based pricing structure for customer-generators that will reduce *some of the subsidies* [emphasis supplied in the original] provided by non-distributed generation customers to distributed generation customers."

- a. Identify the cost to serve a distributed generation customer in LG&E's service territory and provide executable versions of associated workpapers demonstrating how this was calculated.
 - b. Has LG&E estimated the financial impact of net metering service on its non-net metered customers? If yes, identify the cost stated to be a subsidy borne by non-net metering customers, describe how the estimate was developed, and identify all data sources used in developing the estimate.
9. Reference: Seelye Direct, page 53 [PDF 57 of 491], lines 10 through 12, stating "Over the past decade, a small but growing number of utilities have implemented demand rates for all their residential customers, not just new distributed generation customers as in Kansas."
 - a. Please provide copies of all referenced studies, articles, tariffs, or other materials reviewed or relied upon by Mr. Seelye to support his claim.
 - b. Please identify all such utilities that have "implemented demand rates for all their residential customers" and specifically identify which, if any, make such rates mandatory.
 - c. In reference to the rate for "new distributed generation customers as in Kansas", also referred to at p. 48-49 [PDF 52-53] of Seelye Direct, does Mr. Seelye's testimony take into consideration *In the Matter of Joint Application of Westar Energy and Kansas Gas and Electric Co.*, 311 Kan. 320, 460 P.3d 821 (2020) and the remand by Supreme Court of Kansas? Fully explain.
10. Does LG&E have an 8760-hour load profile representative of its current net metering customers? If yes, provide the profile. If no, explain why not.
11. Reference: LG&E's proposed Terms and Conditions: Net Metering Service Interconnection Guidelines, Sheet No. 108 *et seq* [starting at PDF 185 of 2359].
 - a. Condition 7 states that "Customer agrees to inform Company of any changes it wishes to make to its generating or associated facilities that differ from those initially installed and described to Company in writing to obtain approval from Company." Confirm whether the following types of changes are applicable under Condition 7:
 - i. The customer-generator adds additional capacity to its generating system such that the total system capacity does not exceed 45 kilowatts.
 - ii. The customer-generator replaces an existing solar panel that is part of the net metering facility with a new solar panel that is the same type and capacity rating as the solar panel being replaced.
 - iii. The customer-generator replaces an existing solar panel that is part of the net metering facility with a new solar panel that has a different capacity rating than the solar panel being replaced.

- iv. The customer-generator adds a dc-coupled battery energy storage system to a net metered solar facility.
 - v. The customer-generator adds an ac-coupled battery energy storage system to a net metered solar facility.
 - b. Under what conditions or circumstances would a customer that notifies LG&E of a change to its generating or associated facilities under Condition 7 forfeit the legacy rights associated with the net metering system as provided under KRS 278.466(6).
 - c. Explain the purpose of and identify how LG&E intends to implement the proposed Condition 10 [PDF 186 of 2359], which states “Customer recognizes that Company may or may not have adequate facilities to serve customer’s total load at the time of any partial or full failure of customer’s self-generation. Company will work with the customer to serve their load requirements which may be at additional cost to the customer.”
12. Please provide workpapers associated with all Figures, Graphs, Tables, and Exhibits associated with the Direct Testimony of Company Witness William S. Seelye in executable spreadsheet format with all formulas and file linkages intact.
13. Please provide workpapers associated with all Figures, Graphs, Tables, and Exhibits associated with the Direct Testimony of Company Witness Robert M. Conroy in executable spreadsheet format with all formulas and file linkages intact.
14. Reference: Conroy Direct at page 25 [PDF 407 of 447] lines 9-10 stating, in pertinent part, “The Companies already serve a number of eligible customer-generators on their existing Rider NMS...”.
- a. For LG&E, for each residential and non-residential rate schedule (e.g., RS, RTOD-Energy, GS) please identify the number of residential net metering customers that presently take service under NMS-1 and the total generating capacity of NMS-1 systems in kW-DC.
 - b. For each LG&E residential and non-residential rate schedule, identify the corresponding number of net metering customers taking service under the schedule as of the start of the base period.
 - c. For each LG&E residential and non-residential rate schedule, identify the corresponding number of net metering customers taking service under the schedule as of the end of the base period, February 28, 2021 (and update the response as necessary).
 - d. For each LG&E residential and non-residential rate schedule, identify the corresponding number of net metering customers taking service under the schedule and also subject to NMS 1 as of the June 30, 2022, the end of the forecasted test period.

- e. For each LG&E residential and non-residential rate schedule, identify the corresponding number of net metering customers taking service under the schedule and also subject NMS 2 as of June 30, 2022, the end of the forecasted test period.
 - f. If any projection in sub-parts d and e differs from the projection for the applicable rate schedule and rider as of the same date as in LG&E's business plan, identify the difference and fully explain the reason for the difference.
15. Reference: Conroy Direct at page 26 [408 of 447] lines 4-8 stating "It is important to note that, based on the Companies' proposal in these proceedings, customer-generators who size their generating systems to align the generation with their own consumption will continue to receive the same value for the energy consumed as other customer generators served under Rider NMS-1."
- a. Please explain how NMS-2 customers could in practice "size their generating systems" in order to align generation with their own consumption at all times and never export power to the grid.
 - b. Do customers currently have the ability to access interval-metered data necessary to "size their generating systems" so that they never produce exports to the grid. If customers do not have access to this information, please specify when and how this capability will be made available.
 - c. Please identify the number of Louisville Gas and Electric's existing Rider NMS-1 customers' that never export power to the grid, differentiated by rate schedule, and identify the size of each such individual system in kW-DC.
16. Reference: Conroy Direct at page 26 [PDF 408 of 447] at lines 16-17 stating "Once the customer's service is terminated, though, any unused credits will expire." Please explain why it is appropriate for unused credits to expire at the termination of service by a customer instead of having those credits paid to that customer at the time the customer terminates service.
17. Reference: Rider NMS-2 [PDF 104 of 2359] in the Section entitled Energy Rates and Credits, stating, in pertinent part, "Company will provide a dollar denominated bill credit for each kWh of production" and Seelye Direct at page 43 [PDF 47 of 491] lines 8-10 stating "Under the Companies' proposed NMS-2 schedule, new customer-generators will be compensated for any net generation they supply to the grid (i.e., generation that exceeds their energy requirements during the month) at the avoided cost rate..." Please clarify the crediting and/or netting practice used in NMS-2 by identifying which of the examples below (a - d) is correct. If the example is incorrect, please explain why it is incorrect.
- a. A customer-generator produces 1,000 kWh in total during a month and consumes a total of 800 kWh. The customer pays the applicable tariff rate for 800 kWh of consumption and is credited for 1,000 kWh of production at the Rider SQF rate.

- b. A customer-generator produces 1,000 kWh in total during a month and consumes a total of 800 kWh. The customer's generation in excess of their energy requirements is 200 kWh, therefore the customer does not pay anything in form volumetric charges and is credited for 200 kWh of monthly excess generation at the Rider SQF Rate.
 - c. A customer-generator produces 1,000 kWh in total during a month and consumes a total of 800 kWh. Of the 1,000 kWh of production, 400 kWh is used directly behind the customer meter and 600 kWh is exported. The customer therefore pays for 400 kWh of consumption from the grid (i.e., 800 - 400) at the applicable tariff rate and is credited for 600 kWh of exports (i.e., 1000 - 400) at the Rider SQF Rate.
 - d. If crediting and/or netting is determined through a different practice, please explain using the above basic inputs of 1,000 kWh of total production, 400 kWh used directly on-site behind the customer meter, and 800 kWh of total consumption.
 - e. If subpart (c) of this information request presents the correct netting and crediting methodology, please clarify over what duration net customer exports are measured (i.e., instantaneous, 15-minute intervals, 60-minute intervals).
18. Reference: Seelye Direct, at page 55 [PDF 59 of 491], footnote 20.
- a. Is Mr. Seelye familiar with the CAISO's Preliminary Root Cause Analysis (issued October 7, 2020) in reference to the outage event cited in footnote 20?
 - b. If your response to subpart (a) is that Mr. Seelye is familiar with this document:
 - i. Please explain why he chose to cite to a Forbes article as opposed to the CAISO's expert analysis of the event.
 - ii. Does Mr. Seelye believe that footnote 20 provides an accurate and complete characterization of the causes of the referenced event based on the CAISO analysis?
19. Reference: Seelye Direct at page 45 line 18 through page 46 line 2 [PDF 49 and 50 of 491] referring to alleged subsidies flowing from non-customer-generators to customer-generators, including a statement that "This is particularly problematic in the case of low-income customers who may not be able to afford to install solar panels or other types of distributed generation facilities." Please confirm that NMS-2 will make installing solar panels or other types of distributed generation facilities even less affordable to low-income customers. If the response is anything other than an unqualified confirmation, please explain in detail why this would not be the result.
20. Reference: Seelye Direct at page 44 [PDF 48 of 491] lines 12-15 stating, in pertinent part, "renewable distributed generating facilities identified in subparagraph (1)(b) of KRS 278.465 cannot be dispatched by the utility and cannot be supplied as firm capacity. Thus, only energy costs are avoided by the utility receiving electric energy from a customer-generator."

- a. Are LG&E's utility-owned solar facilities capable of being "dispatched" by the Company?
 - b. Did LG&E ascribe a capacity value to any of its utility-owned renewable energy facilities in prior proceedings before the Kentucky Public Service Commission?
 - c. Please identify all other utilities, regional transmission organizations (RTO), and independent system operators (ISO) that the Company is aware of that do not ascribe an accredited capacity value to renewable energy facilities. Please provide citations and links to specific documents such as RTO or ISO tariffs, integrated resource plans, or other manuals and guidance in support of your response.

21. Reference: Seelye Direct at page 41 [PDF 45 of 491] lines 1-9 stating "To ensure that the costs of the Solar Share Program are not shifted to other customers, the Companies have imputed revenues to bring the class rate of return for Solar Share in the Companies' cost of service studies up to the overall rate of return on rate base proposed by the Companies in these proceedings. The Companies are also making imputed revenue adjustments for their Business Solar Programs. Specifically, for the Solar Share Programs, revenues of \$295,846 are imputed for KU and revenues of \$110,942 are imputed for LG&E. For the Business Solar Programs, revenues of \$9,579 are imputed for KU and revenues of \$9,378 are imputed for LG&E."
 - a. Are these imputed revenues non-cash or paper-only revenues that do not actually exist in the form of money transmitted by retail customers to the Companies?
 - b. Is it correct to view these imputed revenues as a subsidy from the Companies' respective shareholders to those programs in order to hold non-participant customers harmless? Fully explain.

22. Reference: Seelye Direct Exhibit WSS-22 [PDF 247-249 of 491]. Is it correct that the negative rates of return listed in Exhibit WSS-22 indicate that the Kentucky Utilities Solar Shares Program (-1.31% rate of return) and the Louisville Gas and Electric Business Solar Rate (-4.38% rate of return) operated at a financial loss to the Companies during the test year?

23. Please explain the differences, if any, between how billing and crediting functions for customers that take service under NMS-2, and customers that take service under Rider SQF Rate B and elect to use the small power production facility to offset on-site use and only sell "part of such output of electrical energy" the Companies, as Rider SQF allows.

24. Reference: The Direct Testimony of Company Witness Paul W. Thompson ("Thompson Direct") at page 3 [PDF 5 of 499], lines 4 and 5 in which Mr. Thompson states, "I am proud of the way we balance all stakeholder interest and deliver safe, reliable, environmentally sound energy to our customers at low costs."

- a. Does Mr. Thompson agree or disagree that making net metering available to eligible customer-generators has furthered the efforts of the Company in balancing all stakeholder interests. Please fully explain any agreement or disagreement.
 - b. At page 3 of Thompson Direct [PDF 5 of 499], lines 8 through 13, Mr. Thompson identifies “renewable clean energy and societal expectations” as being among the major forces impacting the Companies’ business. Does Mr. Thompson agree or disagree that net metering falls within the scope of “renewable clean energy and societal expectations” as that phrase is used in his testimony? Please fully explain any agreement or disagreement.
 - c. At page 4 of Thompson Direct [PDF 6 of 499], lines 12 through 15, Mr. Thompson states, “We have enhanced the safety, operation and efficiency of our already reliable generation fleet, electric transmission and distribution network, and natural gas distribution network in an environmentally responsible manner at reasonable costs and with exceptions customer service.” Does Mr. Thompson agree or disagree that the addition of solar generation, regardless of which side of the meter that the generation takes place, has assisted the Companies in attaining these enhancements? Please fully explain any agreement or disagreement.
 - d. At page 11 of Thompson Direct [PDF 13 of 499], lines 11 through 14, Mr. Thompson states, “For example, the Companies’ Integrated Resource Planning processes continuously assess generation resources to ensure that customer capacity needs are met at the lowest reasonable cost.” Does Mr. Thompson agree or disagree that minimization of the costs of environmental compliance requirements, including but not limited to costs falling within the scope of costs identified pursuant to KRS 278.183, is part of the Companies’ Integrated Resource Planning process? Please fully explain any agreement or disagreement.
 - e. Have the Companies considered pursuing the acquisition of Solar Renewable Energy Certificates/environmental attributes from their customers? If yes, identify the efforts to date. If no, explain why not.
 - f. At page 18 of Thompson Direct [PDF 20 of 499], lines 22 and 23, Mr. Thompson discusses “stranded assets” and “inter-generational inequities.” Please provide Mr. Thompson’s definition for each of these phrases and explain the considerations necessary to balance all stakeholder interests for each of these topics.
25. Reference: The Direct Testimony of Company Lonnie E. Bellar (“Bellar Direct”), at Exhibit LEB-3, Appendix D, Page 2 of 10 [PDF 232 of 499]. The first sentence of the “Executive Summary” states, “The continued growth of distributed energy resources and new loads such as electric vehicles are placing increasingly dynamic demands on the distribution grid.” Please identify the limit(s), if any, associated with the growth of new loads such as electric vehicles. For example, is there a statutory cap through which the Company shall have no further obligation of providing service associated with electric vehicles upon reaching the statutory cap?

26. Reference: The Direct Testimony of David S. Sinclair (“Sinclair Direct”) at page 10 [PDF 259 of 299], lines 4 through 20.
- a. Provide the Company’s single hour peak load during a calendar year, as that metric is used pursuant to KRS 278.466(1) for the period up to and including the first day of the base period.
 - b. Provide the Company’s estimate, projection, or forecast of the single hour peak load during a calendar year, as that metric is used pursuant to KRS 278.466(1) for the period up to and including the last day of the forecasted test period, June 30, 2022.
 - c. Provide the Company’s estimate, projection, or forecast of the single hour peak load during a calendar year, as that metric is used pursuant to KRS 278.466(1) for the period up to and including the last day of the forecasted information contained in the Company’s 2021 Business Plan and identify its location(s) in the Business Plan.
 - d. Does the Company estimate, project, or forecast that the cumulative generating capacity of net metering systems will reach one percent (1%) of the Company’s single hour peak load during a calendar year, as that phrase is used in KRS 278.466(1), before full deployment of the proposed Advanced Metering Infrastructure (“AMI”)?
27. Reference: The Direct Testimony of John K. Wolfe (“Wolfe Direct”), at Exhibit JKW-2, Page 35 of 44 [PDF 394 of 499]. The section, “Individual Electric Vehicle Charging Identification,” includes the following statement, “If successful, customers with EV chargers who did not register their installation with the utility can be identified, planned for, and educated about any rates that would encourage off-peak charging.” Please fully explain why the Company would encourage off-peak charging.
28. Reference: Seelye Direct at page 2 [PDF 6 of 491], lines 34 through 38. The testimony includes the statement, “The purpose of this structure in the presentation of these rates schedules is to provide more information to customers, stakeholders, and employees about which costs are avoidable through the installation of distributed generation (i.e., the variable cost component) and which costs are less likely to be avoided (i.e., the fixed cost component).” Please define and/or explain costs that are “less likely to be avoided” as Mr. Seelye uses that phrase in his Direct Testimony.