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 CONVENIENCE AND NECESSITY TO DEPLOY ADVANCED METERING INFRASTRUCTURE, APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS, AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT	)))))))))	CASE NO. 2020-00350

KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.
SUPPLEMENTAL 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 Supplemental 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 Supplemental 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 5th day of February 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.
SUPPLEMENTAL REQUESTS FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY

1. Please refer to your response to KYSEIA 1-15(c), which provides a table depicting NMS-1 customers that "never export power to the grid." For the purposes of this table, please identify the interval over which an "export" of power to the grid was measured (e.g., instantaneous, 15 minutes, hourly, monthly).

2. Please refer to your response to KYSEIA 1-11(c) discussing adequacy of Company facilities in the case of a distributed generation ("DG") outage and KYSEIA 1-28, which states that "Costs that cannot be avoided (or are "less likely to be avoided" as referenced in Mr. Seelye's testimony) are fixed demand- and customer-related costs. For example, once poles, transformers, conductor, services, meters, etc. are installed, the depreciation and other costs related to these facilities cannot be avoided." Please explain how facilities such as poles, transformers, conductors, etc. that are adequate to serve a DG customer before they install DG would become inadequate to meet that customer's full load after they install DG.

3. Please refer to your response to KYSEIA 1-10. Please provide the interval data that the Company does have for its current residential net metering customers. The data for each customer should be associated with a unique identifier, but this request does not require the inclusion of information that could be used to identify an individual customer. Please ensure that your response includes all information necessary to interpret the data, including but not limited to clear and complete explanations for all data fields, time and date specifications, etc.

4. Please provide 8760 hour load profiles for a residential electric heating customer, a residential non-electric heating customer, and a class average residential customer.

5. Please refer to your response to PSC Staff 2-102(b) and 2-103. Please provide a calculation of the SQF rate that does not "exclude" fuel related costs that the Company represents are "fixed and non-variable."

6. Please reference the Company's current and proposed Rider SQF and proposed Rider NMS-2. Under a scenario where a customer elects service under Rider SQF and exercises the option to sell "part of the output" from their distributed generation system to the Company (i.e., utilize a portion of the energy directly on-site), please explain in detail any differences between what the customer pays for electricity and their compensation for electricity exported to the grid under this arrangement would be from a scenario where that same customer instead took service under NMS-2.

7. Please explain how the output from customer-sited DG affects the allocators used in the Company's cost of service study. For instance, for the fixed production cost allocator based on Loss of Load Probability ("LOLP"), how is production utilized in the development of the hourly LOLP amounts that form the basis for this allocator?

8. Please refer to the Direct Testimony of William Seelye ("Seelye Direct"), Exhibit WSS-22 [PDF 248 of 491]. Please identify the dates and times of the peaks used in the development of alternative allocators based on the 12 CP and 6 CP methodologies. Please specify whether these times reflect prevailing time adjusted for daylight savings time.

9. Please refer to Seelye Direct at page 115 [PDF 119 of 491] lines 17-21 stating that maximum class demands form the basis of allocators for transmission costs.
   a. Has maximum class demand historically been used to allocate transmission costs by the Company?
   b. Is it Witness Seelye's view that maximum class demand is commonly used by other utilities to allocate transmission costs? Please identify any other examples of utilities or states that use maximum class demand rather than a measure of coincident peak demand to allocate transmission costs.
   c. Please explain the specific reasons that the Company used maximum class demand as opposed to a coincident demand methodology to allocate transmission costs.
   d. Please identify the date and times for the maximum class demand for each class of customer. Please specify whether these times reflect prevailing time adjusted for daylight savings time.

10. Please refer to the Company's response to the Attorney General and KIUC 1-179. Please specify whether the peak load hours reflected in the Attachment to the response are:
   a. Hour ending or hour beginning.
   b. Adjusted for daylight savings time.

11. Please refer to your response to the Attorney General and KIUC 1-188 and accompanying attachments depicting class cost of service results using different fixed production cost allocation methodologies. Please explain:
   a. Why customer-related unit costs vary depending on which methodology (LOLP, 6 CP, 12 CP) is used to allocated fixed production costs.
   b. Why it is reasonable for a cost of service study to produce results for customer-related unit costs that are sensitive to the selection of a methodology for allocating totally unrelated costs, such as production costs.

12. Please refer to your response in PSC Staff 2-122(2), stating in relevant part that "The load data used to develop these estimates are not based on a statistically valid sample, particularly considering the large variance in the usage patterns for net metering customers." [PDF 101 of 163]
   a. Please confirm or refute that the estimate provided by the Company in this response for the amount of the second type of subsidy received by residential net metering customers reflects a statistically biased estimate of the second type of subsidy as a result of the Company's failure to use a statistically valid sample to create this estimate.
   b. Please confirm or refute that this characterization is also true with respect to the Company's estimate from the following statement made elsewhere in the same response: "If the 1% cap on net generation capacity is reached on LG&E's system,

then this second subsidy would increase to over $500,000 annually." Provide the underlying assumptions used in the Company's calculation. [PDF 102 of 163]

13. Please refer to your response in KYSEIA 1-19.
    a. Please confirm that NMS-2 relative to NMS-1, holding other variables constant, will result in an increase in the payback period and a decrease in the net present value to a customer that invests in a new net-metered DG facility, assuming the DG facility's electricity exports to the grid are greater than zero. If the response is anything other than an unqualified confirmation, please explain in detail why this would not be the result.
    b. Is the Company aware that customers can finance an investment in a DG facility and that financing can make investments in rooftop solar accessible to customers that otherwise would not have been able to afford the full upfront cost of a system?
    c. Does the Company agree that, holding other variables constant, a change in the Company's net metering tariff that results in an increase in the payback period and a decrease in the net present value to a customer that invests in a new net-metered DG facility is more likely than not to reduce the number of low- and moderate-income customers that can afford to install a DG facility, including through financing the DG facility?