

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

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.  
COMBINED SUPPLEMENTAL FILING TO UPDATE RESPONSES  
TO STAFF'S 3<sup>RD</sup> DATA REQUESTS AND KENTUCKY UTILITIES  
COMPANY'S AND LOUISVILLE GAS AND ELECTRIC COMPANY'S  
SUPPLEMENTAL DATA REQUESTS**

Comes now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and submits its combined supplemental filing to update its responses to Items 1 and 2 of Commission Staff's Third Data Requests which were filed into the record by Staff and served upon KYSEIA on July 22, 2021, for which KYSEIA filed responses on August 2, 2021.

Further, KYSEIA updates its response to Item 2 of Kentucky Utilities Company's ("KU") and Louisville Gas and Electric Company's ("LG&E" – collectively "Companies") Supplemental Data Requests which were filed into the record by the Companies and served upon KYSEIA on July 22, 2021, for which KYSEIA filed its response on August 2, 2021.

The supplemental filing contains KYSEIA witness Justin Barnes' additional workpapers used in preparing his Supplemental Rebuttal Testimony (filed August 5, 2021) and are filed into the records in the instant cases to update and complement KYSEIA's prior provision of workpapers in the above-identified responses to Staff, KU, and LG&E.

Respectfully submitted,

/s/David E. Spenard  
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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 13<sup>th</sup> day of August 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, March 24, 2020, and July 22, 2021 Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus Covid-19*, the paper, in paper medium, is not required to be filed.

/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.**  
**KY PSC Case No. 2020-00349 and**  
**Case No. 2020-00350**  
**Updated Response to Staff 3<sup>rd</sup> Data Requests**  
**(Supplemental)**

**Witnesses Responsible:**

Justin Barnes

1. Refer to the Supplemental Testimony of Justin R. Barnes (Supplemental Barnes Testimony), page 9, lines 13–15. Provide supporting calculation of the proposed capacity rate of \$0.0357/kWh in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

**Response:**

Please see Mr. Barnes' workpapers, which are attached. The tab labeled ELCC LOLP – DST contains calculations underlying the hourly LOLP weighting and ELCC calculation. The raw hourly LOLP data was sourced from:

[https://psc.ky.gov/pscecf/2020-0349/rick.lovekamp%40geku.com/04012021020836/2020\\_PSC\\_DR5\\_KU\\_Attach\\_to\\_Q19\\_-\\_DER\\_LOLP\\_EUE.xlsx](https://psc.ky.gov/pscecf/2020-0349/rick.lovekamp%40geku.com/04012021020836/2020_PSC_DR5_KU_Attach_to_Q19_-_DER_LOLP_EUE.xlsx)

The tab labeled Gen Capacity shows the calculation of capacity value. Capacity costs are based on the PJM Net CONE in terms of UCAP \$/MW-day for the most recent three auction years.

**Update:**

Please see Mr. Barnes' workpapers which were used in preparing his Supplemental Rebuttal Testimony, attached.

**Kentucky Solar Industries Association, Inc.**  
**KY PSC Case No. 2020-00349 and**  
**Case No. 2020-00350**  
**Updated Response to Staff's 3<sup>rd</sup> Data Requests**  
**(Supplemental)**

**Witnesses Responsible:**

Justin R. Barnes

2. Refer to the Supplemental Barnes Testimony, page 10, lines 18–20.
  - a. Provide supporting calculation of the proposed avoided transmission cost rate of \$0.01989/kWh and \$0.01037/kWh for KU and LG&E, respectively, under the loss of load probability methodology in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.
  - b. Provide supporting calculation of the proposed avoided transmission cost rate of \$0.00812/kWh and \$0.00782/kWh for KU and LG&E, respectively, under the 6 coincident peak methodology in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

**Response:**

- a. Please see Mr. Barnes' workpapers, which are attached. The transmission unit costs were derived from:

Kentucky Utilities: [https://psc.ky.gov/pscecf/2020-00349/mike.hornung%40lgeku.com/01222021020208/2020\\_AG-KIUC\\_DR1\\_KU\\_Attach\\_to\\_Q188\\_-\\_Att\\_3\\_KU\\_LOLP\\_COSS\\_with\\_Unit\\_Costs.xlsx](https://psc.ky.gov/pscecf/2020-00349/mike.hornung%40lgeku.com/01222021020208/2020_AG-KIUC_DR1_KU_Attach_to_Q188_-_Att_3_KU_LOLP_COSS_with_Unit_Costs.xlsx)

Louisville Gas & Electric: [https://psc.ky.gov/pscecf/2020-00350/rick.lovekamp%40lgeku.com/01222021013405/2020\\_AG-KIUC\\_DR1\\_LGE\\_Attach\\_to\\_Q188\\_-\\_att\\_3\\_LGE\\_LOLP\\_COSS\\_with\\_Unit\\_Costs.xlsx](https://psc.ky.gov/pscecf/2020-00350/rick.lovekamp%40lgeku.com/01222021013405/2020_AG-KIUC_DR1_LGE_Attach_to_Q188_-_att_3_LGE_LOLP_COSS_with_Unit_Costs.xlsx)

- b. Please see Mr. Barnes' workpapers, which are attached. The 6CP hours used to calculate effective solar capacity under a 6CP scenario are sourced from:  
[https://psc.ky.gov/pscecf/2020-00349/rick.lovekamp%40lgeku.com/04122021030810/2020\\_Rebuttal\\_Testimony\\_Seelye\\_Workpapers\\_-\\_KU\\_LGE\\_Residential\\_Class\\_Shapes\\_20210326.xlsx](https://psc.ky.gov/pscecf/2020-00349/rick.lovekamp%40lgeku.com/04122021030810/2020_Rebuttal_Testimony_Seelye_Workpapers_-_KU_LGE_Residential_Class_Shapes_20210326.xlsx)

The transmission unit costs for the 6CP scenario were derived from:

Kentucky Utilities: [https://psc.ky.gov/pscecf/2020-00349/mike.hornung%40lgeku.com/01222021020208/2020\\_AG-KIUC\\_DR1\\_KU\\_Attach\\_to\\_Q188\\_-\\_Att\\_1\\_KU\\_6CP\\_COSS\\_with\\_Unit\\_Costs.xlsx](https://psc.ky.gov/pscecf/2020-00349/mike.hornung%40lgeku.com/01222021020208/2020_AG-KIUC_DR1_KU_Attach_to_Q188_-_Att_1_KU_6CP_COSS_with_Unit_Costs.xlsx)

Louisville Gas & Electric: [https://psc.ky.gov/pscecf/2020-00350/rick.lovekamp%40lgeku.com/01222021013405/2020\\_AG-KIUC DR1 LGE Attach to Q188 - att 1 LGE 6CP COSS with Unit Costs.xlsx](https://psc.ky.gov/pscecf/2020-00350/rick.lovekamp%40lgeku.com/01222021013405/2020_AG-KIUC_DR1_LGE_Attach_to_Q188_-_att_1_LGE_6CP_COSS_with_Unit_Costs.xlsx)

**Update:**

Please see Mr. Barnes' workpapers which were used in preparing his Supplemental Rebuttal Testimony, attached.

**Kentucky Solar Industries Association, Inc.**  
**KY PSC Case No. 2020-00349 and**  
**Case No. 2020-00350**  
**Updated Response to KU/LG&E Supplemental Data Requests**  
**(Supplemental)**

**Witnesses Responsible:**

Justin R. Barnes

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

**Response:**

Workpapers attached.

**Update:**

Please see Mr. Barnes' workpapers which were used in preparing his Supplemental Rebuttal Testimony, attached.

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**AFFIDAVIT OF JUSTIN BARNES  
VERIFICATION**

JURISDICTION )  
 )  
 County of Wise, Virginia )

The undersigned, Justin Barnes, being first duly sworn, states the following: The prepared Supplement attached thereto constitute the testimony of Affiant in the above-styled cases. Affiant states that he would give the answers set forth in the Supplement if asked the questions propounded therein. Affiant further states that, to the best of his knowledge, his statements are true and correct. Further, Affiant saith not.

  
 Name of Witness



SUBSCRIBED AND SWORN to before me on this 13<sup>th</sup> day of August, 2021 by

*Justin Jones*

*Mary Lee Hagy*  
NOTARY PUBLIC

My Commission Expires: 06/30/2023

