

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 RATES FOR ELECTRIC )  
AND GAS SERVICE, A CERTIFICATE OF )  
PUBLIC CONVENIENCE AND NECESSITY TO )  
DEPLOY ADVANCED METERING ) CASE NO.  
INFRASTRUCTURE, APPROVAL OF CERTAIN ) 2020-00349  
REGULATORY AND ACCOUNTING )  
TREATMENTS, AND ESTABLISHMENT OF A )  
ONE-YEAR SURCREDIT )

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

**RESPONSE OF JOINT INTERVENORS MOUNTAIN ASSOCIATION, KENTUCKIANS  
FOR THE COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY AND  
METROPOLITAN HOUSING COALITION TO POST-HEARING REQUEST FOR  
INFORMATION FROM COMMISSION STAFF**

Tom FitzGerald  
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Counsel for Joint Intervenors  
Mountain Association, Kentucky  
Solar Energy Society, Kentuckians For  
The Commonwealth and  
Metropolitan Housing Coalition

August 25, 2021

## **Response of Joint Intervenors To Commission Staff Post Hearing Request For Information**

### **Commission Staff Post-Hearing DR 1:**

Refer to the Supplemental Testimony of Karl R. Rábago, page 4, footnote3; to Joint Intervenors' Response to Staff's Fourth Request, Item 1; and to Mr. Rábago's August 18, 2021 hearing testimony, generally. Provide Xcel Energy's September 2020 value of solar (VOS) compliance filing, in Docket No. 13-867, with the Minnesota Public Utilities Commission and the VOS calculation spreadsheets submitted with the VOS compliance filing.

### **JI Response 1:**

The Xcel Energy 2020 VOS Compliance Filing, consisting of fifteen (15) Excel worksheets, and two (2) PDF files (including an index to the documents captioned "Xcel VOS Documents MN PUC Docket 13-867"), are filed concurrently with this response. There are two docket items identified as "Trade Secret" which are not available.

Witness: Karl Rábago

Respectfully submitted,




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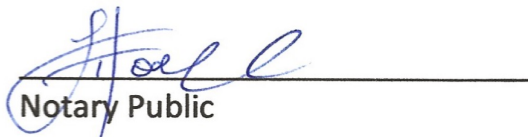
*Counsel for Joint Intervenors,  
Mountain Association (Case No.  
2020-00349), Kentuckians for the  
Commonwealth, Kentucky Solar  
Energy Society and Metropolitan  
Housing Coalition (Case No. 2020-  
00350)*

VERIFICATION

The undersigned, Karl R. Rábago, after being first duly sworn, deposes and says that he has personal knowledge of the matters set forth in his foregoing *Responses to August 20, 2021 Commission Staff's Post-Hearing Request for Information to Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Metropolitan Housing Coalition, and Mountain Association* and that the information contained therein is true and correct to the best of his information, knowledge, and belief, after reasonable inquiry.

  
Karl R. Rábago

Subscribed and sworn to before me by Karl R. Rábago this 25 day of August 2021.

  
Notary Public

My commission expires: 3-27-24

LORI KRISTEN HOWELL  
Notary Public  
State of Colorado  
Notary ID # 20204011760  
My Commission Expires 03-27-2024

## CERTIFICATE OF SERVICE

This is to certify that this electronic filing of the *Response of Joint Intervenors To Post-Hearing Requests For Information From Commission Staff* has been transmitted to the Commission on August 25, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that in accordance with the July 22, 2021 Commission Order in Case No. 2020-00085 and notwithstanding 807 KAR 5:001 Section 8(3), no original paper copy of this filing will be filed with the Commission.



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Tom FitzGerald