

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

**In the Matter of:**

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

**JOINT SUPPLEMENTAL DATA REQUESTS OF  
KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY  
PROPOUNDED TO KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to the Kentucky Solar Industries Association, Inc. (“KYSIA”) to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on June 30, 2021.

## **Instructions**

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, KYSIA, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if KYSIA receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.
4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.
5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.
6. If KYSIA objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.
7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.
8. In the event any document requested has been destroyed or transferred beyond the control of KYSIA, its counsel, or its witnesses, 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 such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

## Supplemental Data Requests

1. Please provide a copy of each IRS Form 990 filed by KYSIA, if any, for tax years 2018, 2019, and 2020.

### Justin 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.
3. Please provide a detailed description of Mr. Barnes's experience performing embedded cost of service studies. In this regard, provide the following:
  - a. List each electric utility for which Mr. Barnes has performed an embedded cost-of-service study. For each such utility, provide the test period of the cost-of-service study, the methodology used to allocate fixed production costs, the party for whom Mr. Barnes conducted the cost-of-service study, the regulatory jurisdiction in which the utility provides service, and the case or docket number as applicable to the marginal cost-of-service study performed by Mr. Barnes.
  - b. For each embedded cost of service performed by Mr. Barnes, describe the methodology used to allocate production fixed costs and purchased power costs.
4. Please provide a detailed description of Mr. Barnes's experience performing marginal cost of service studies. In this regard, provide the following:
  - a. List each electric utility for which Mr. Barnes has performed a marginal cost-of-service study. For each such utility, a description of the methodology used in the study to calculate marginal costs, the party for whom Mr. Barnes conducted the cost-of-service study, the regulatory jurisdiction in which the utility provides service, and the case or docket number as applicable to the marginal cost-of-service study performed by Mr. Barnes.
  - b. For each cost of service performed by Mr. Barnes, describe the methodology used to allocate production fixed costs and purchased power costs.
5. Please provide a detailed description of Mr. Barnes's experience performing avoided cost studies. In this regard, provide the following:
  - a. List each electric utility for which Mr. Barnes has performed an avoided study. For each party for whom Mr. Barnes conducted the avoided cost study, list the regulatory jurisdiction in which the utility provides service,

and the case or docket number as applicable to the marginal cost-of-service study performed by Mr. Barnes.

- b. For each such utility, describe the methodology used to calculate production capacity avoided costs, production energy avoided cost, transmission capacity avoided cost, distribution capacity avoided cost.
6. See pages 8-9 of Mr. Barnes's Supplemental Testimony. To the extent not already provided in response to these requests, please provide all supporting data, citation, sources, and electronic workpapers with formulas intact supporting all values resulting in Mr. Barnes's "capacity rate of \$0.0357/kWh."
7. On page 10, lines 8-10 of his Supplemental Testimony, Mr. Barnes states that "my preliminary LOLP calculation produces a weighted solar capacity factor of 58.14 percent. A 6CP assessment produces an effective solar capacity factor of 35.92." With respect to these values, provide the workpapers showing a detailed calculation of these percentages, with references describing the source of the demands or other data used to perform the calculations.
8. On page 10, lines 17-20 of his Supplemental Testimony, Mr. Barnes states, "The resulting preliminary rates under an LOLP methodology are \$0.01989/kWh for KU and \$0.01037/kWh for LG&E. Under a 6CP methodology the rates are \$0.00812/kWh for KU and \$0.00782/kWh for LG&E." With respect to these values, provide the electronic workpapers showing a detailed calculation of these percentages, with references describing the source of the costs, demands and energy used to calculate the values, all assumptions made by Mr. Barnes, and the source and basis for any assumptions. Provide copies of any source documents used by Mr. Barnes.
9. On page 10, lines 17-20 of his Supplemental Testimony, Mr. Barnes states, "The resulting preliminary rates under an LOLP methodology are \$0.01989/kWh for KU and \$0.01037/kWh for LG&E. Under a 6CP methodology the rates are \$0.00812/kWh for KU and \$0.00782/kWh for LG&E." Please confirm that these values were derived from costs determined in the Companies' embedded cost of service studies.
10. On page 10, lines 17-20 of his Supplemental Testimony, Mr. Barnes states, "The resulting preliminary rates under an LOLP methodology are \$0.01989/kWh for KU and \$0.01037/kWh for LG&E. Under a 6CP methodology the rates are \$0.00812/kWh for KU and \$0.00782/kWh for LG&E." Please confirm that these values derive from embedded transmission costs. If they do not derive from embedded transmission costs, please explain the basis for these values.
11. On page 10, lines 17-20 of his Supplemental Testimony, Mr. Barnes states that, "The resulting preliminary rates under an LOLP methodology are \$0.01989/kWh for KU and \$0.01037/kWh for LG&E. Under a 6CP methodology the rates are \$0.00812/kWh for KU and \$0.00782/kWh for LG&E." If these costs derive from

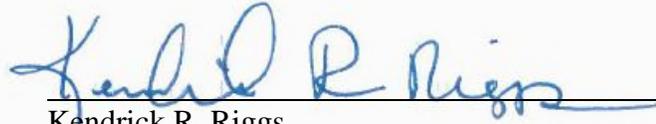
embedded costs, provide a detailed explanation of how the Companies can avoid these embedded costs.

12. Please identify each planned transmission plant investment that KU and LG&E will avoid during the next 20 years because of purchasing energy from customer-generators served under NMS-2. In the response, identify all transmission lines, transformers, substations, and other specific equipment that will be avoided as a result of purchases from customer-generators served under NMS-2.
13. Considering that KU and LG&E are not members of PJM, please explain in detail why PJM's ancillary service rates should be used to determine avoided ancillary service costs for KU and LG&E instead of the ancillary service rates for KU and LG&E that have been approved by the Federal Energy Regulatory Commission ("FERC") for KU and LG&E.
14. Please explain whether relying on ancillary service rates in PJM rather than the ancillary service rates or ancillary service costs that have been approved by FERC for LG&E and KU, as applicable, would violate the filed rate doctrine.
15. Explain in detail why Mr. Barnes did not calculate avoided ancillary service costs based on KU and LG&E's ancillary service costs but instead relied on PJM costs.
16. Considering that KU and LG&E are not members of PJM, please explain in detail why generation capacity costs related to PJM should be used to determine avoided capacity costs for KU and LG&E instead of generation capacity costs that could be avoided by KU and LG&E.
17. Explain in detail why Mr. Barnes did not calculate avoided generation costs based on KU and LG&E's generation capacity but instead relied on PJM costs.
18. Explain in detail why Mr. Barnes did not calculate avoided energy costs based on KU and LG&E's energy costs but instead relied on PJM costs.
19. Please provide the percentage of KU's energy requirements that were supplied by PJM generation resources for the 12 months ended December 31, 2020.
20. Please provide the percentage of LG&E's energy requirement that were supplied by PJM generation resources for the 12 months ended December 31, 2020.
21. Please provide the percentage of KU's energy requirements that were supplied by KU and LG&E's combined generation for the 12 months ended December 31, 2020.
22. On page 10, line 17 of his testimony, Mr. Barnes indicated that he assumes that the loss factor is 5%. Please provide a derivation of the 5%, showing the losses (a) broken down by voltage and (b) broken down between I2R losses and core losses.

23. Assuming that net metering is capped at 1% of system peak demand, please explain in detail which, if any, of KU's and LG&E's existing distribution facilities Mr. Barnes believes energy supplied by NMS-2 customers will allow KU and LG&E to avoid replacing over time. For example, will KU and LG&E be able to avoid replacing poles on the distribution system when they need to be replaced?
24. Assuming that net metering is capped at 1% of system peak demand, please explain in detail which, if any, of KU's and LG&E's existing transmission facilities Mr. Barnes believes energy supplied by NMS-2 customers will allow KU and LG&E to avoid replacing over time. For example, will KU and LG&E be able to avoid replacing transmission towers on the transmission system when they need to be replaced?

Dated: July 22, 2021

Respectfully submitted,



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*Counsel for Kentucky Utilities Company  
and Louisville Gas and Electric Company*

**CERTIFICATE OF COMPLIANCE**

In accordance with 807 KAR 5:001 Section 8(7), this is to certify that Kentucky Utilities Company's and Louisville Gas and Electric Company's July 22, 2021 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on July 22, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a true and correct copy in paper medium will be delivered to the Commission within 30 days of the lifting of the State of Emergency.



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*Kenneth R. Riggs*  
*Counsel for Kentucky Utilities Company*  
*and Louisville Gas and Electric Company*