

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AUTHORIZATION)
OF CHANGES IN SERVICE TERRITORY) CASE NO. 2021-00372
WITH SOUTH KENTUCKY RURAL ELECTRIC)
COOPERATIVE CORPORATION)

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
DATED DECEMBER 21, 2021

FILED: JANUARY 18, 2022

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF WISE)

The undersigned, **Stewart Spradlin**, being duly sworn, deposes and says that he is Manager, Operations Center for Kentucky Utilities Company d/b/a Old Dominion Power and an employee of Kentucky Utilities Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Stewart Spradlin

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12th day of January 2022.



Notary Public

Notary Public ID No. 603967

My Commission Expires:

July 11, 2022

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Rick E. Lovekamp**, being duly sworn, deposes and says that he is Manager - Regulatory Strategy/Policy for Kentucky Utilities Company, and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.


Rick E. Lovekamp

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 17th day of January 2022.


Notary Public

Notary Public ID No. 603967

My Commission Expires:
July 11, 2022

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated December 21, 2021**

Case No. 2021-00372

Question No. 1

Responding Witness: Stewart Spradlin

- Q-1. Refer to the Application, page 3, paragraph 5. Describe how the developer contacted South Kentucky Rural Electric Cooperative Corporation (South Kentucky RECC) to request to change electric service from South Kentucky RECC to KU, and provide documentation of the request.
- A-1. South Kentucky RECC was initially contacted by the customer, requesting electric service for his development, in December 2020. It is believed that the developer's initial contact was made by telephone to the South Kentucky RECC engineer, Mr. Jeff Craig, who is now retired. Thus, no documentation exists. Upon meeting with the customer, South Kentucky RECC representatives discovered that the Rebecca Light Tract 2 parcel was a split lot (with KU) and the majority of the development would be located within KU service territory. South Kentucky RECC further determined that only one or two (of the five) proposed buildings could be easily served from South Kentucky RECC existing electric facilities. The customer requested to have all buildings served by one utility, which prompted South Kentucky RECC's subsequent discussions with KU representatives.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated December 21, 2021**

Case No. 2021-00372

Question No. 2

Responding Witness: Stewart Spradlin

- Q-2. Refer to the Application, page 3, paragraph 5. Describe how South Kentucky RECC contacted KU to request to change electric service from South Kentucky RECC to KU, and provide documentation of the request.
- A-2. South Kentucky RECC representative Jeff Craig initially contacted KU representative David Laun about this customer via telephone on December 21, 2020 (following South Kentucky RECC's initial contact with the customer). Mr. Laun then met with Mr. Craig at the site on the following day, December 22, 2020. After their meeting, Mr. Laun compared the proposed development with the certified electric territorial boundary lines of the official Kentucky Public Service Commission's quadrant map. Mr. Laun followed up with South Kentucky RECC engineering manager (Dakota Brown) on January 11, 2021 to discuss his findings. Since the South Kentucky RECC request was made via telephone and/or in the field as discussed above, no documentation exists.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff’s First Request for Information
Dated December 21, 2021**

Case No. 2021-00372

Question No. 3

Responding Witness: Rick E. Lovekamp

- Q-3. Explain whether KU will charge the new residents different rates than the rates the new residents would have paid to South Kentucky RECC, and provide a schedule comparing the rates the new residents will be pay to KU and would have paid to South Kentucky RECC.

- A-3. KU will charge the customers the applicable tariff rates that have been approved by the Kentucky Public Service Commission.

The table below provides a comparison of the KU and South Kentucky RECC rates that have been approved by the Kentucky Public Service Commission. December 2021 billing factors were used and does not include taxes and franchisee fees.

Description	Kentucky Utilities Company		South Kentucky RECC	
Customer Charge		\$ 16.43		\$ 13.29
Energy Charge per kWh	\$ 0.09699	96.99	\$ 0.08433	84.33
Fuel Adjustment Clause	\$ 0.00293	2.93	\$ 0.01760	17.60
Environmental Cost Recovery Surcharge	2.74%	3.20	14.75%	16.99
Demand-Side Management Cost Recovery Mechanism	\$ 0.00086	0.86	\$ -	-
Economic Relief Surcredit	\$ (0.00068)	(0.68)	\$ -	-
Home Energy Assistance		0.30		-
Estimated Bill Comparison Total		\$ 120.03		\$ 132.21

Bill Comparison Assumptions				
Both estimated bills are calculated with a usage of 1,000 kWh				
Kentucky Utilities Company				
Residential Service Tariff, P.S.C. No. 20, Second Revision of Sheet No. 5, Effective Date December 6, 2021				
Customer Charge (\$0.53/per day x 31 days)				
Fuel Adjustment Clause includes the Off-System Sales Adjustment Clause				
South Kentucky RECC				
Residential, Farm and Non-Farm Service, P.S.C. No. 7, 18th Revised Sheet No. T-1, Effective Date October 1, 2021				

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated December 21, 2021**

Case No. 2021-00372

Question No. 4

Responding Witness: Stewart Spradlin

- Q-4. Describe in detail any alternatives to the proposed agreement that were considered by KU and South Kentucky RECC.
- A-4. Because two of the five proposed new buildings will be located in a “split” territory shared by South Kentucky RECC and KU, the utilities had no alternative to avoid filing a petition for a change in the service territory boundary lines. The utilities did discuss one alternative arrangement, which was for KU to serve the three buildings situated wholly within KU’s current service territory, and for South Kentucky RECC to serve the two buildings that are located within the split territory.

As discussed in response to Question No. 1, however, the customer requested to be served by one utility, which the utilities also agreed was reasonable for the reasons already mentioned in the application and responses.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Request for Information
Dated December 21, 2021**

Case No. 2021-00372

Question No. 5

Responding Witness: Stewart Spradlin

- Q-5. Refer to the Application, Exhibit 3, the Delmer Site Map.
- a. There are two rows in the coordinate table and the map labeled Point Number 4, and Number 7 is missing. Confirm that the second reference to Point Number 4 should be Point Number 7 on the table and on the map, and, if confirmed, provide a revised map and the table. If this cannot be confirmed, explain why there are two Point Number 4s and no Point Number 7.
 - b. Insert the name of the Coordinate System that defines the Eastings and Northings, as well as the Datum (such as NAD 1983), on the map below the table. If this is an unusual coordinate system, please include the parameters that define it.
 - c. Submit a revised Exhibit 3, signed and dated as required by KRS 278.017.
- A-5.
- a. KU confirms that Point 7 was incorrectly labeled as a second Point 4 and all points are in their correct locations on the site map. However, shortly before receiving the Commission's data requests, KU had discovered that other coordinates were listed incorrectly on the chart in the map. Therefore, KU and South Kentucky RECC had already developed a new map with the correct coordinates to be filed as an update, and KU is now submitting that corrected map as Revised Application Exhibit 3 – Site Map to this data response.
 - b. NAD 1983 StatePlane Kentucky South FIPS 1602 (US Feet).
 - c. See Response to Item 5 (a) above and see attached.

Revised Application Exhibit 3 – Site Map

is being provided in a separate
file