

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF)	
KENTUCKY UTILITIES COMPANY FOR)	CASE NO. 2022-00371
APPROVAL OF AN ECONOMIC)	
DEVELOPMENT RIDER SPECIAL)	
CONTRACT WITH BITIKI-KY, LLC)	

**DATA REQUESTS OF KENTUCKY UTILITIES COMPANY
PROPOUNDED TO JOINT INTERVENORS - KENTUCKIANS FOR THE
COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY, MOUNTAIN
ASSOCIATION, AND KENTUCKY RESOURCES COUNCIL, INC.**

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to the Joint Intervenors – Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Kentucky Resources Council (“Joint Intervenors”) to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on November 4, 2022.

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, the Joint Intervenors, their witnesses, or their 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 the Joint Intervenors receive or generate 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 the Joint Intervenors object 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 the Joint Intervenors, their witnesses, or their counsel, 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.

Data Requests

1. Regarding the educational and work experience of witness Chelsea Hotaling:
 - a. Has Ms. Hotaling prepared a marginal cost of service study for any utility? If so, for each such study please provide the name of the utility, the relevant case identification information for the proceeding in which Ms. Hotaling supplied the study into the public record, and a copy of the study (or a working link to the study).
 - b. Ms. Hotaling’s testimony states at page 1, lines 17-18, “I have reviewed over a dozen integrated resource plans (IRPs) and related filings by utilities....” Has Ms. Hotaling prepared or participated in preparing an IRP? If so, please provide the relevant case identification information for each proceeding in which Ms. Hotaling prepared or participated in preparing an IRP (or testimony based on such IRP) into the public record and a copy of the testimony or IRP (or working links to such testimony and IRP).
 - c. Appendix A to Ms. Hotaling’s testimony indicates that she “specializ[es] in integrated resource planning and load forecasting” and “[her] current work is focused on all aspects of Integrated Resource Planning including ... load forecasting.”
 - i. Has Ms. Hotaling prepared a load forecast for any utility? If so, for each such load forecast please provide the name of the utility, the relevant case identification information for the proceeding in which Ms. Hotaling supplied the load forecast into the public record, and a copy of the load forecast (or a working link to the load forecast).
 - d. Ms. Hotaling’s testimony states at page 1, lines 20-21, “I have performed my own capacity expansion and production cost modeling in numerous cases” The “Selected Projects” section of Appendix A of Ms. Hotaling’s testimony appears to indicate that she has performed such modeling nine times.
 - i. Please provide the relevant case identification information for each proceeding in which Ms. Hotaling supplied such modeling (or testimony based on such modeling) into the public record, and a copy of the testimony or modeling data (or working links to such testimony and modeling data).
 - ii. If Ms. Hotaling has conducted “capacity expansion and production cost modeling” not otherwise addressed in the response to this request, please provide the relevant case identification information for each proceeding in which she supplied such modeling (or testimony based on such modeling) into the public record, and a copy of the testimony or modeling data (or working links to such testimony and modeling data).

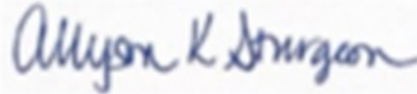
- e. Appendix A to Ms. Hotaling’s testimony indicates that she received a B.S. degree in 2007 and an M.B.A. in 2012, but the first entry in the “Experience” heading is a Research Assistant position from 2016-2019. Please provide Ms. Hotaling’s work experience from 2007 to 2016, including employer names, positions held, dates of employment, and brief descriptions of the tasks she performed for each employer.
 - f. Please provide a copy of or working link to each of the items listed in the “Publications” section of Appendix A of witness Hotaling’s testimony.
 - g. To the extent not otherwise provided in response to this request, please provide a copy of or working link to each piece of testimony filed under witness Hotaling’s name in any utility-related proceeding.
2. Regarding the educational and work experience of witness Stacy L. Sherwood:
- a. Does Ms. Sherwood have any experience in economic development in Kentucky? If so, please describe that experience in detail and provide a copy of or a working link to each publication or piece of testimony by Ms. Sherwood concerning economic development in Kentucky.
 - b. Other than Kentucky, does Ms. Sherwood have any experience in economic development? If so, please describe that experience in detail and provide a copy of or a working link to each publication or piece of testimony by Ms. Sherwood concerning economic development.
 - c. If Ms. Sherwood has education or experience concerning cryptocurrency mining or the volatility of cryptocurrency markets, please describe that education or experience in detail and provide a copy of or a working link to each publication, paper, or piece of testimony by Ms. Sherwood concerning cryptocurrency mining or the volatility of cryptocurrency markets.
 - d. Has Ms. Sherwood prepared a marginal cost of service study for any utility? If so, for each such study please provide the name of the utility, the relevant case identification information for the proceeding in which Ms. Sherwood supplied the study into the public record, and a copy of the study (or a working link to the study).
3. Ms. Sherwood’s testimony states at page 19, lines 5-6, “The utility should demonstrate that no financial harm will be incurred by existing customers as a result of the EDR discount.”
- a. Please explain in detail how financial harm would be incurred by existing customers with the addition of the Bitiki load, even with the EDR discount.
 - b. Do the Joint Intervenors agree that the marginal production demand cost of Bitiki’s service, if any, will not be included in KU’s base rates until new base rates go into effect following KU’s next base rate case?

- c. Do the Joint Intervenors acknowledge that KU has committed to a rate-case stay out such that the earliest date new base rates can take effect following KU's next base-rate case is July 1, 2025?¹

¹ See, e.g., *Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric 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. 2020-00349, Order at 11-12 (Ky. PSC June 30, 2021).

Dated: January 31, 2023

Respectfully submitted,



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CERTIFICATE OF COMPLIANCE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on January 31, 2023; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

A handwritten signature in blue ink that reads "Allyson K. Jurgens". The signature is written in a cursive style and is centered horizontally.

Counsel for Kentucky Utilities Company