

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND	)	
ELECTRIC COMPANY AND KENTUCKY	)	
UTILITIES COMPANY TO INSTALL AND	)	
OPERATE ELECTRIC CHARGING STATIONS IN	)	
THEIR CERTIFIED TERRITORIES, FOR	)	
APPROVAL OF AN ELECTRIC VEHICLE	)	CASE NO.
SUPPLY EQUIPMENT RIDER, AN ELECTRIC	)	2015-00355
VEHICLE SUPPLY EQUIPMENT RATE, AN	)	
ELECTRIC VEHICLE CHARGING RATE,	)	
DEPRECIATION RATE, AND FOR A DEVIATION	)	
FROM THE REQUIREMENTS OF CERTAIN	)	
COMMISSION REGULATIONS	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO  
LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES  
COMPANY

Louisville Gas and Electric Company and Kentucky Utilities Company (jointly, "Companies"), pursuant to 807 KAR 5:001, are to file with the Commission an original in paper medium and an electronic copy of the following information. The information requested herein is due on or before February 5, 2016. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and

accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Companies shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Companies fail or refuse to furnish all or part of the requested information, the Companies shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the Companies shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Corrections to Application and Testimony filed on November 30, 2015, Correction 1, which states that "over 750 plug-in electric hybrid vehicles and battery electric vehicles have been registered in the state of Kentucky since 2010." State the number of these vehicles that were registered in each of the Companies' territories.

2. Refer to the Companies' response to Commission Staff's First Request for Information ("Staff's First Request"), Item 1. The response indicates that, although the

Companies' proposed tariffs are not yet approved, some of the Companies' customers have installed their own electric-vehicle charging stations ("charging station") "behind the customer meter."

a. Given that customers are currently able to install charging stations, explain the necessity of the proposed Electric Vehicle Supply Equipment - Rider ("EVSE-R") tariff.

b. Explain the benefits and costs to customers of choosing to install electric-vehicle charging stations on their own, versus under the proposed EVSE-R tariff.

3. Explain why the Companies are giving customers a choice of placing the charging stations inside the meter or outside the meter rather, than requiring the charging stations to be inside the meter in order for usage to be metered.

4. Refer to the Companies' response to Staff's First Request, Item 4, which states that "the terms and conditions of the EVC tariff will not be posted at the charging station." State whether the Companies are able to post the terms and conditions of the proposed Electric Vehicle Charging ("EVC") tariff at the charging stations. If such postings are possible, explain the Companies' decision to not do so.

5. Refer to the Companies' response to Staff's First Request, Item 5, which sought a list of the comparable charging station facilities referenced in John Spanos's letter included in the Companies' application. The response states that: (1) Mr. Spanos had "visited and reviewed a handful of Electric Vehicle Charging Stations owned by other utilities" and (2) the stations "are located all across the United States." (Emphasis added). However, no list was included. Provide a list of the handful of stations visited

and reviewed by Mr. Spanos which identifies each station's charging level (AC Level 1, AC Level 2, or DC Fast Charging), the utility that owns the station, and the general location of the station.

6. Refer to the Companies' response to Staff's First Request, Item 8.d.(1). State whether the Companies employed an outside contractor to assist in the development of the request for proposals ("RFP") or in the analysis of the responses to the RFP. If so, provide the name of the contractor and a copy of any reports prepared by the contractor for the Companies.

7. Refer to the Companies' response to Staff's First Request, Item 8.d(3), the attached CD, tab "Pricing Comparison Detail." Confirm that ChargePoint Product 1 and Product 5 were selected. If this cannot be confirmed, explain which of the products were chosen. If this can be confirmed, explain why those products were chosen over the other ChargePoint products.

8. Refer to the Companies' response to Staff's First Request, Item 9, which discusses the restriction of the proposed Electric Vehicle Supply Equipment ("EVSE") and EVSE-R tariffs to non-residential customers. Provide the following information related to residential customers:

a. The number of customers taking service under the Residential Time-of-Day – Energy ("RTOD-E") tariff for each of the Companies.

b. The number of customers taking service under the Residential Time-of-Day – Demand ("RTOD-D") tariff for each of the Companies.

c. If known, the number of customers with electric vehicles served under each of the RTOD-E, RTOD-D, and Residential Service tariffs for each company.

9. Refer to the Companies' response to Staff's First Request, Item 10. Given that the fees proposed in the EVC tariff are calculated to recover all costs incurred to install, operate and maintain the charging stations, explain why a limit on the number of charging stations installed is necessary.

10. Refer to the Companies' response to Staff's First Request, Item 11.d. The response states that a customer "may make reservations on a charging station where he or she can select a starting time to start a charge. At that time, the charge must be initiated." It also states that "[i]t is our vendor's experience that enabling preset start and/or end times does not encourage a driver to move his vehicle."

a. Given the concern of the vendor, explain why reservations with preset start times will be allowed.

b. If the charge must be initiated at the designated start time, explain what happens if traffic, weather, etc., delays the customer beyond the start time.

11. Refer to the Companies' response to Staff's First Request, Item 13.b., the last bullet point.

a. Explain how the customer currently using a charging station is incentivized to move his or her vehicle when charging is complete.

b. Explain whether a customer continues to pay the charging rate once the electric vehicle is fully charged but remains connected to the charging station.

12. Refer to the Companies' response to Staff's First Request, Item 14.a. which states, "The FAC charge for EVSE (assumed energy) and EVSE-R customer will be part of the regular FAC charge on the bill." Refer also to the sample bills provided in response to Staff's First Request, Item 24. Confirm that the bills for EVSE customers

show two FAC line items (one for their standard tariff and one for the EVSE tariff) and clarify that it is the Companies' intent to set out two FAC line items for EVSE customers.

13. Refer to the Companies' response to Staff's First Request, Item 16.a. If a site owner chooses to assess a fee for use of the charging station, explain how the fee will be developed and state whether the fee will be developed in coordination with ChargePoint and/or the Companies.

14. Refer to the Companies' response to Staff's First Request, Item 19, which states that "[i]n order to develop rates the Companies assumed each charging station would provide one charge per day." Explain the basis for this assumption and provide the formulas and sample calculations for the charging rate assumptions.

15. Refer to the Companies' response to Staff's First Request, Item 21. Explain how the General Service energy rate was chosen for use in calculating the monthly environmental surcharge for the charging stations.

16. Refer to the Companies' response to Staff's First Request, Item 23. Explain whether an EVSE-R customer could experience an increase in demand because of the charging station. If an increase in demand could occur, explain why the increase in demand revenue that would be received by the Companies was not taken into consideration in calculating the proposed rates for the EVSE-R tariff.

17. Refer to the Companies' response to Staff's First Request, Item 24, the sample bills attached to the response. The front pages of the sample bills show the environmental surcharge being calculated by multiplying the environmental surcharge percentage by the revenue total of the basic service charge, energy charge, and demand-side management charge after deducting the base fuel charge associated with

the kWh used.<sup>1</sup> The second pages of the sample bills state in the Billing Information section that when calculating the environmental surcharge, the fuel cost included in both the energy charge and fuel adjustment are deducted from electric charges. However, only the fuel cost included in the energy charge is deducted on the first pages. Explain why the fuel cost associated with the fuel adjustment is not deducted when calculating the environmental surcharge.



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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED JAN 25 2016

cc: Parties of Record

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<sup>1</sup> The amount deducted is equal to the base fuel rate multiplied by the kWh used.

\*Gregory T Dutton  
Assistant Attorney General  
Office of the Attorney General Utility & Rate  
1024 Capital Center Drive  
Suite 200  
Frankfort, KENTUCKY 40601-8204

\*Gerald E Wuetcher  
Attorney at Law  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Rick E Lovekamp  
Manager - Regulatory Affairs  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Honorable Kendrick R Riggs  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828

\*Honorable Allyson K Sturgeon  
Senior Corporate Attorney  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Sara Veeneman  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202