

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EXAMINATION BY THE)	
PUBLIC SERVICE COMMISSION OF THE)	
ENVIRONMENTAL SURCHARGE MECHANISM)	CASE NO.
OF KENTUCKY UTILITIES COMPANY FOR THE)	2016-00437
SIX-MONTH BILLING PERIOD ENDING)	
OCTOBER 31, 2016)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO
KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU"), pursuant to 807 KAR 5:001, is to file with the Commission the original in paper medium and an electronic version of the following information. The information requested herein is due on or before March 28, 2017. 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 the 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.

KU shall make timely amendment to any prior response if it obtains 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 KU fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its 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 filing a paper containing personal information, KU 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 KU's response to Commission Staff's First Request for Information ("Staff's First Request"), Item 2, Attachment, page 2 of 3, columns 9 and 10, "ECR Billing Factor Revenues" and KU's monthly environmental surcharge reports for the expense months of May 2016 through October 2016, ES Form 3.00, column 6, "Environmental Surcharge Revenues." Explain why these amounts differ from the product of the applicable monthly billing factors and revenues subject to surcharge. If applicable, include KU's policy for rounding the monthly billing factors, both for billing purposes and the monthly environmental surcharge reports.

2. Refer to KU's response to Staff's First Request, Item 2, Attachment, page 3 of 3, wherein KU indicates an over-recovery of \$1,366,839 as a result of using 12-month average revenues to determine KU's monthly billing factors. Commission Staff has been unable to duplicate this amount based on its understanding of KU's explanation of the calculation in response to Commission Staff's inquiry at the informal conference held on February 14, 2017. Provide in Excel spreadsheet format with all

formulas intact and unprotected and all rows and columns accessible, the calculation of the \$1,366,839 over-recovery as a result of using 12-month average revenues to determine KU's monthly billing factor.



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DATED MAR 14 2017

cc: Parties of Record

Case No. 2016-00437

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