

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC EXAMINATION OF THE)	
APPLICATION OF THE FUEL)	CASE NO.
ADJUSTMENT CLAUSE OF KENTUCKY)	2018-00020
UTILITIES COMPANY FROM MAY 1,)	
2017 THROUGH OCTOBER 31, 2017)	

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 an original and an electronic version of the following information. The information requested herein is due no later than April 4, 2018. 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 the 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 shall 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, 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 the response to Commission Staff's First Request for Information ("Staff's First Request"), Item 2. This response shows several contracts where the Actual Quantity Received is significantly below the Tonnage Requirement. Explain if KU is concerned that any of the contracts listed will not be able to meet the Tonnage Requirement as set out in the contract.

2. Refer to the response to Staff's First Request, Item 6. This response lists several natural gas purchases made on a forward basis. Explain if the gas being procured on a forward basis is for KU's Cane Run 7 generating station, KU's combustion turbine peaking units, or both.

3. Refer to the response to Staff's First Request, Item 16. This response shows that Cane Run 7 operated at a 45.4 percent capacity factor for the month of May 2017.

a. State if this is a typical capacity factor for this unit for this month.

b. Given that the response to Staff's First Request, Item 15 shows no outages for Cane Run 7 during the month of May, explain why the unit did not operate more often.

4. Refer to the Testimony of Derek A. Rahn.

a. Explain under what circumstances KU would call upon a CSR customer to interrupt its load if KU were in the position where it could generate the buy-through power using its own resources.

b. Explain if the "extra charges received by the company" as discussed on page 2, lines 13–14, is the difference between the Buy-Through Price that is charged to a CSR customer, and the actual price KU pays for natural gas to operate the peaking unit serving the CSR customer's Buy-Through power. If not, list and explain the types of charges that make up the extra charges received by the company.



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DATED MAR 28 2018

cc: Parties of Record

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