

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN ADJUSTMENT)
OF ITS ELECTRIC RATES, A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY) CASE NO.
TO DEPLOY ADVANCED METERING) 2020-00349
INFRASTRUCTURE, APPROVAL OF)
CERTAIN REGULATORY AND ACCOUNTING)
TREATMENTS, AND ESTABLISHMENT OF A)
ONE-YEAR SURCREDIT)

ELECTRONIC APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS ELECTRIC AND GAS)
RATES, A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY TO) CASE NO.
DEPLOY ADVANCED METERING) 2020-00350
INFRASTRUCTURE, APPROVAL OF)
CERTAIN REGULATORY AND ACCOUNTING)
TREATMENTS, AND ESTABLISHMENT OF A)
ONE-YEAR SURCREDIT)

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT AND
TO LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

Louisville/Jefferson County Metro Government (Louisville/Metro) and Lexington-Fayette Urban County Government (LFUCG), pursuant to 807 KAR 5:001, are to file with the Commission an electronic version of the following information. The information requested herein is due on April 1, 2021. The Commission directs Louisville/Metro and LFUCG to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No.

2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

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.

Louisville/Metro and LFUCG shall make timely amendment to any prior response if Louisville/Metro and LFUCG obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Louisville/Metro and LFUCG fail or refuse to furnish all or part of the requested information, Louisville/Metro and LFUCG 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 these proceedings in the requested format, reference may be made to the specific location of that information in

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

responding to this request. When filing a paper containing personal information, Louisville/Metro and LFUCG 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 Direct Testimony of Richard Bunch (Bunch Testimony), page 11, line 1 through page 12, line 2, which discusses whether Kentucky Utilities Company (KU) and Louisville Gas and Electric Company (LG&E) (jointly KU/LG&E) comply with manufacturer recommendations when choosing LED luminaires to replace HID fixtures. Explain whether a municipality would be able to choose a different LED luminaire that more aligns with manufacturer recommendations. If not confirmed, explain.

2. Refer to the Bunch Testimony, page 15, lines 4–6. Provide documented support that maintenance visits for HID fixtures are more frequent than LED maintenance visits.

3. Refer to the Bunch Testimony, page 29, lines 3–6, which states that customers are dissatisfied with respect to streetlight outages. Explain what this statement is based on and whether customers only refers to LFUCG and Louisville Metro or if it includes other customers.

4. Refer to the Bunch Testimony, pages 33–34.

a. Provide the other utilities for which Mr. Bunch based his assumptions.

b. Provide any published reports that support Mr. Bunch's outage assumptions.

5. Refer to the Bunch Testimony, pages 38–39. Provided any documented studies for the state of Kentucky supporting the assertion that outages occur long before they are reported.

6. Refer to the Bunch Testimony, page 40, lines 16–22, which states that the Commission should impose standards for timely restoration and for bill credits that hold KU/LG&E accountable for quick reaction to reported outages and establish incentives to prevent outages altogether through the use of reliable equipment, preventive maintenance, and to identify outages quickly. Provide detailed examples of such standards and incentives and identify any utilities that are subject to similar standards and incentives.

7. Refer to the Bunch Testimony, page 41, lines 4–8, which states that KU/LG&E could use a sample from a given area to represent the operating condition of all their street lights and adjust the entire bill based on that sample and that customers should be able to submit their own audit figures that KU/LG&E could accept or challenge by conducting their own audit.

a. Explain whether it is likely that street lighting in certain areas could be more reliable than other areas.

b. Explain how KU/LG&E would be able to determine or estimate how long streetlights have not been operating to determine the appropriate adjustment to the bill.

c. Indicate whether the customer should be responsible for an audit conducted by KU/LG&E if they did not accept the customer’s audit figures.

d. Identify any utilities that adjust street lighting bills for outages and explain how they determine the appropriate adjustment amount.

8. Refer to the Bunch Testimony, page 46, lines 10–13, which states that the Commission should establish meaningful enforceable tariff provisions that create accountability for KU/LG&E to deliver reliable street lighting service, emphasize prevention over restoration, refund customer costs for outages and provide for financial penalties for repeated or prolonged outages. Provide example tariff language from other jurisdictions that contain such tariff provisions.

9. Refer to the Bunch Testimony, Exhibit Bunch 2.

a. Provide all the lighting rates that would result from the proposed allocations, assuming that the entire amount of LG&E's proposed electric rate increase were approved by the Commission. Provide this in Excel spreadsheet format with all with all formulas, columns, and rows unprotected and fully accessible.

b. Provide all the lighting rates that would result from the proposed allocations, assuming that the entire amount of KU's proposed electric rate increase were approved by the Commission. Provide this in Excel spreadsheet format with all with all formulas, columns, and rows unprotected and fully accessible.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAR 19 2021
cc: Parties of Record

Case No. 2020-00349
Case No. 2020-00350

*Honorable Allyson K Sturgeon
Managing Senior Counsel - Regulatory &
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Honorable David Edward Spenard
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Emily W Medlyn
General Attorney
U.S. Army Legal Services Agency Regul
9275 Gunston Road
Fort Belvoir, VIRGINIA 22060

*Honorable Kurt J Boehm
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Barry Alan Naum
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Thomas J FitzGerald
Counsel & Director
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KENTUCKY 40602

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

*Clay A. Barkley
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*G. Houston Parrish
Labor Law Attorney
Office of the Staff Judge Advocate, B
50 3rd Avenue
Fort Knox, KENTUCKY 40121

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Carrie H Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NORTH CAROLINA 27103

*James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Matt Partymiller
President
Kentucky Solar Industries Association
1038 Brentwood Court
Suite B
Lexington, KENTUCKY 40511

*Honorable David J. Barberie
Managing Attorney
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KENTUCKY 40507

*Jody M Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Matthew Miller
Sierra Club
50 F Street, NW, Eighth Floor
Washington, DISTRICT OF COLUMBIA 20001

*Don C Parker
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WEST VIRGINIA 25301

*Joe F. Childers
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KENTUCKY 40507

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

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

*Rick LoveKamp
Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Honorable Robert C Moore
Attorney At Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Robert Conroy
Vice President, State Regulation and Rates
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Randal A. Strobo
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KENTUCKY 40202

*Sara Judd
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Susan Speckert
Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KENTUCKY 40507