

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN ADJUSTMENT)
OF ITS ELECTRIC AND GAS RATES, A)
CERTIFICATE OF PUBLIC CONVENIENCE) CASE NO.
AND NECESSITY TO DEPLOY ADVANCED) 2020-00349
METERING 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 FOURTH REQUEST FOR INFORMATION
TO MOUNTAIN ASSOCIATION, KENTUCKIANS FOR THE COMMONWEALTH,
KENTUCKY SOLAR ENERGY SOCIETY, AND
METROPOLITAN HOUSING COALITION

Mountain Association, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Metropolitan Housing Coalition (jointly, Joint Intervenors), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on August 13, 2021. The Commission directs the Joint Intervenors to the Commission's July 22, 2021 Order in Case No. 2020-

00085¹ regarding filings with the Commission. 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.

The Joint Intervenors shall make timely amendment to any prior response if the Joint Intervenors 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 the Joint Intervenors fails or refuses to furnish all or part of the requested information, the Joint Intervenors 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, the Joint Intervenors shall, in accordance

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Supplemental Testimony of Karl R. Rabago, page 4, footnote 3.

a. Explain whether Mr. Rabago is familiar with Xcel Energy's proposed updated VOS avoided distribution cost methodology (Xcel proposal:

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId=%7B50FB786A-0000-C512-B5C6-C21A1840989C%7D&documentTitle=20195-152611-01> and Commission Order: <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId=%7B30D2CC6E-0000-CA1D-A52B-274566AF32CF%7D&documentTitle=201912-157987-01>).

b. Explain why or why not Mr. Rabago finds this method to be reasonable.


_____ for
Linda C. Bridwell, PE
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P.O. Box 615
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DATED AUG 03 2021

cc: Parties of Record

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

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