

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 SECOND REQUEST FOR INFORMATION  
TO KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.

Kentucky Solar Industries Association, Inc. (KYSEIA), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on April 20, 2021. The Commission directs KYSEIA to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-

00085<sup>1</sup> 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.

KYSEIA shall make timely amendment to any prior response if KYSEIA obtains 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 KYSEIA fails or refuses to furnish all or part of the requested information, KYSEIA 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

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<sup>1</sup> 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.

separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, KYSEIA 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 Benjamin D. Inskeep, page 15, lines 3–21. In order to determine the value of exports over a long-term time horizon, state whether there is a best practice for determining an appropriate discount rate to use in such a long term study (e.g. Weighted Average Cost of Capital or Prime rate). Provide references to support your response.

2. Refer to the Direct Testimony of Justin R. Barnes (Barnes Testimony), pages 8–9. Explain what methodology you would propose for calculating a fuel price hedging value to include in the avoided energy cost. Provide as much detail as possible, including citations to substantiate the approach.

3. Refer to the Barnes Testimony, page 20, lines 11–12.

a. List and cite “the assumptions used in the IRP” that should be used to calculate “the capacity contribution applied to non-dispatchable resources, such as solar or wind”.

b. Describe a methodology for translating these assumptions into a \$/kWh avoided capacity cost for such resources. Provide as much detail as possible, including citations to substantiate the calculation approach.



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DATED APR 14 2021

cc: Parties of Record

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

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