

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) CASE NO.
CONVENIENCE AND NECESSITY TO) 2020-00350
DEPLOY ADVANCED METERING)
INFRASTRUCTURE, APPROVAL OF)
CERTAIN REGULATORY AND ACCOUNTING)
TREATMENTS, AND ESTABLISHMENT OF A)
ONE-YEAR SURCREDIT)

COMMISSION STAFF'S THIRD 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 August 2, 2021. The Commission directs KYSEIA 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.

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

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.

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 Supplemental Testimony of Justin R. Barnes (Supplemental Barnes Testimony), page 9, lines 13–15. Provide supporting calculation of the proposed capacity rate of \$0.0357/kWh in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

2. Refer to the Supplemental Barnes Testimony, page 10, lines 18–20.

a. Provide supporting calculation of the proposed avoided transmission cost rate of \$0.01989/kWh and \$0.01037/kWh for KU and LG&E, respectively, under the loss of load probability methodology in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

b. Provide supporting calculation of the proposed avoided transmission cost rate of \$0.00812/kWh and \$0.00782/kWh for KU and LG&E, respectively, under the 6 coincident peak methodology in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

3. Provide all utilities that have used a loss of load probability (LOLP) or similar approach for estimating avoided transmission and distribution capacity costs.

4. According to the references listed below, an approach to calculating the effective load carrying capacity (ELCC) transforms the LOLP into a loss of load expectation (LOLE). Explain why Mr. Barnes relied on the LOLP approach as opposed to the LOLE approach.

- NREL, *Determining the Capacity Value of Wind: An Updated Survey of Methods and Implementation*, 2008.
- PJM, *Effective Load Carrying Capability (ELCC)*, 2020.
- NREL, *Estimating the Costs and Benefits of Avoided Generation Capacity*, 2014.
- CPUC, *Decision (D.) 19-09-043*, issued under Rulemaking (R.) 18-07-003 on October 3rd, 2019.
- NREL, *Methods for Analyzing the Benefits and Costs of Distributed Photovoltaic Generation to the U.S. Electric Utility System*.



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DATED JUL 22 2021

cc: Parties of Record

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

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