

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

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
TO KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY

Kentucky Utilities Company (KU) and Louisville Gas and Electric Company (LG&E) (jointly, KU/LG&E or the Companies), 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 May 19, 2021. The Commission directs KU/LG&E to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> regarding filings

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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.

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.

KU/LG&E shall make timely amendment to any prior response if KU/LG&E obtain 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/LG&E fail or refuse to furnish all or part of the requested information, KU/LG&E shall provide a written explanation of the specific grounds for their 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/LG&E shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the account in which KU/LG&E included the test-year SEEM expenses.

2. Of the \$10.766 million increase in in-line inspection, provide a breakdown of inspections performed in the high consequence areas, the medium consequence areas, and any other area.

3. Regarding the Joint Reliability Coordination Agreement, state whether this will need to be filed at FERC and whether KU/LG&E will be the filing party.

4. Provide an analysis that shows the evaluation of all options considered by LG&E to comply with the Mega Rule, including in-line inspections.

5. State whether LG&E performs in-line inspections on pipeline segments that do not contain a high consequence area.

6. Provide the miles of pipeline inspected using in-line inspections that are high consequence areas and the total miles of pipeline inspected using in-line inspections of all areas of LG&E's gas system. Provide these amounts for the past five calendar years and the next three years' projections, if available.

7. Provide a copy of all studies indicating that using in-line inspections in lieu of other assessment methods is cost-effective.

8. If LG&E intends to use in-line inspections as the default assessment method for high consequence areas, explain how doing so in all instances or by default is "the method . . . best suited to address the threats identified."

9. Explain whether the Commission should review the Certificate of Public Convenience and Necessity (CPCN) provided to LG&E in 2017 for the Bullitt County natural gas pipeline project given the material change in projected cost, including the expectation that LG&E's most recent cost estimates are outdated. Any explanation should include a conversation about the Commission's reasonable, least-cost alternative CPCN standard and how that standard is implicated given the material change in projected cost.

10. Provide a copy of the most recent economic analysis of the Bullitt County natural gas pipeline project.

11. Provide all studies in KU/LG&E's possession or conducted by KU/LG&E involving the installation and use of Distributed Energy Resource Management System.

12. Provide a breakdown by company of the total number of net metering applications for 2019, 2020, and 2021.

13. Provide the projected number of residential customers KU/LG&E anticipate disconnecting once disconnection is resumed.

14. Refer to KU/LG&E's response to Commission Staff's Fifth Request for Information, Item 2, regarding budgeted legal expenses. Provide a schedule showing the estimated cost per item listed in each category.

15. State how long each FLS customer interruption lasted for year 2020.

16. State whether customers with PV plus storage are eligible for service under the various TOD options. That is, explain whether these customers can elect not to take service under NMS but under one of the various TOD schedules or whether these

customers can elect to take service under NMS and also under one of the various TOD schedules.

17. Refer to the Direct Testimony of John K. Wolfe, Exhibit JKW-1, pages 17–18 of 37. Provide the 2020 information for customers experiencing multiple interruptions, and separately include momentary interruptions. Further, provide the 2019 data for customers experiencing multiple interruptions, including momentary interruptions.

18. Provide Exhibits 2, 3, and 4 from the Stipulation in Excel Spreadsheet format with all rows, columns, and formulas unprotected and fully accessible.

19. Refer to the Application, the Direct Testimony of William Steven Seelye. Provide updates to Exhibits WSS-11, WSS-12, WSS-16, WSS-17, and WSS-19 based upon the Stipulation in Excel Spreadsheet format with all rows, columns, and formulas unprotected and fully accessible.

20. Refer to LG&E's response to Commission Staff's Sixth Request for Information, Item 33, regarding the revisions to the Firm Transportation Tariff.

a. Explain whether, and if so how, this revision could impact the eligibility for gas transportation service for a new customer's additional load if they install a generation facility that is served under Rate CGS, IGS, or DGGS.

b. Explain whether there are any circumstances in which a customer's generation load could qualify for gas transportation service without an underlying sales service.

21. Refer to KU/LG&E's responses to the Joint Intervenor's Second Request for Information, Item 2c, page 6 of 6, Average Cost Per Late Payer table. For both KU and LG&E, provide the calculation, in Excel spreadsheet format with all rows, columns,

and formulas unprotected and fully accessible , showing how the amount in the customer contact row was calculated. Provide as much detail and explanation as possible and show the calculation for how each component was derived.

22. Refer to LG&E's response to Commission Staff's Third Request for Information, Item 45, which provided a revised cost justification for the gas meter test fee in the amount of \$112.86. Also refer to Stipulation Exhibit 7, page 53 of 144, proposed settlement tariff, which reflects the originally proposed gas meter test fee amount of \$101. Confirm which amount LG&E is currently proposing for the gas meter test fee.

23. Refer to the Application, Direct Testimony of Robert M. Conroy, page 47, lines 7–10, which discusses the proposed revision to the Economic Development Rider (EDR) requiring a customer seeking an EDR contract designed to retain the load of existing customers to provide an affidavit stating that, without the rate discount, its operations would cease or be severely restricted and demonstrating financial hardship to the Company. Provide a copy of the affidavit that customers would be required to sign, and the Companies file, in relation to a request for a retention EDR contract.

24. For both LG&E and KU, provide separate cost justification, in Excel spreadsheet format with all rows, columns, and formulas unprotected and fully accessible, for a regular hours disconnect/reconnect service charge and an after-hours disconnect/reconnect service charge. Provide as much detail and explanation as possible, and show the calculation for how each component was derived.

25. Provide the billing analysis included in the Stipulation as Exhibits 2, 3, and 4 in Excel spreadsheet format with all rows, columns, and formulas unprotected and fully accessible.

26. State how cost was classified for the energy component used in KU/LG&E's embedded class cost of service studies from 2012 to the current rate case for both KU and LG&E.

27. Confirm whether the effective load carrying capability has been implemented in PJM or approved by FERC for use in PJM, and if so, state when it was implemented or approved.

28. If a married couple taking service under Tariff NMS-1 or NMS-2, with the bill in one person's name, divorces or one person passes and the other spouse stays in the house and the name on the bill changes, explain whether this would be considered a termination of service, resulting in a termination of bill credits, or if this would be considered something less than a termination of service.

29. Explain why KU/LG&E have not provided the salary information for the identified executives whose salary is \$50,000 or more in its annual report filed with the Commission.

30. Provide the monetary benefit to the system, if any, by the rates that will be paid for the fast charging service and facilities expected to be installed by KU/LG&E in 2022.

31. Explain whether customers will be better off, worse off, or indifferent from electric vehicle (EV) fast charging stations owned by KU/LG&E or by third-party owned EV fast charging stations would be minimized or non-existent.

32. Explain whether the Companies intend to or have done any studies to identify areas on its system in which the actual incremental system costs of adding demand specific to EV fast charging station makes sense.

33. Provide a copy of the 2021 Agreement between LG&E and the Louisville Air Pollution Control Board in regard to limiting the operation of the Mill Creek Station in order to address the Louisville/Jefferson County ozone requirements for the 2021 ozone season or subsequent ozone seasons.

34. Explain how the Companies will determine the cause for the hesitancy of customers to request service under Rate OSL before the Companies' next general rate case.

35. Explain what the Companies are currently doing to encourage eligible customers to take service under Rate OSL.

36. For each Company, provide the number of applications for net metering service that have been filed up to present that are not in service and have not been withdrawn.

37. For each Company, provide the number of applications for net metering service that were filed with the Companies after the applications were filed in these matters, but have subsequently been withdrawn. If available, provide the reason for each withdrawn application.

38. In relation to the change in the planned economic life of Mill Creek 2 and the identified and planned upgrades to satisfy projected environmental requirements for Mill Creek 2, explain when stay open costs were identified, which plan those costs were based on, and when those costs were determined with any certainty. Further, provide updates or changes to those explanations that have been made since July 2020.



39. Explain whether KU/LG&E agree that net metering applications filed prior to the effective date of the proposed net metering tariffs in these matters are eligible for service under NMS-1.

40. Provide the number of residential late fees waived, by month, between June 1, 2019, and February 28, 2020.



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DATED MAY 05 2021

cc: Parties of Record

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Case No. 2020-00350

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