

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY AND)	
KENTUCKY UTILITIES COMPANY FOR)	
APPROVAL OF A SOLAR POWER)	CASE NO.
CONTRACT AND TWO RENEWABLE POWER)	2020-00016
AGREEMENTS TO SATISFY CUSTOMER)	
REQUESTS FOR A RENEWABLE ENERGY)	
SOURCE UNDER GREEN TARIFF OPTION #3)	

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

Louisville Gas And Electric Company and Kentucky Utilities Company (collectively, LG&E/KU), 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 November 12, 2020. The Commission directs LG&E/KU 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.

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.

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.

LG&E/KU shall make timely amendment to any prior response if LG&E/KU 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 LG&E/KU fail or refuse to furnish all or part of the requested information, LG&E/KU 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, LG&E/KU 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 LG&E/KU's response to Staff's Second Request for Information (Staff's Second Request), Item 1(c), Attachment 1. Also, refer to the August 25, 2020 Informal Conference PowerPoint, filed on September 1, 2020, slides 16–23, which provide example calculations of the economics of the Solar Purchase Power Agreement (PPA) in Fuel Adjustment Clause (FAC) calculations over two years. Apply the same scenarios and data in LG&E/KU's response to Staff's Second Request, Item 1(c), Attachment 1, to FAC calculations of economics example demonstrated in slides 16–23 of the August 25, 2020 Informal Conference PowerPoint.

2. Provide a timeline of the following events:

a. The date when LG&E/KU received the Request for Proposal (RFP) finalists' cost proposals for 77.5 MW and 100 MW Solar PPAs;

b. The date when LG&E/KU decided to pursue Solar PPA for 100 MW energy;

c. The date when LG&E/KU first learned of the total amount of renewable energy sought by Toyota and Dow; and

d. The date when LG&E/KU, Toyota, and Dow finalized the total amount of renewable energy sought by Toyota and Dow, respectively.



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Public Service Commission
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DATED OCT 28 2020

cc: Parties of Record

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