## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Ma	atter of:
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ELECTRONIC 2021 JOINT INTEGRATED	)	
RESOURCE PLAN OF LOUISVILLE GAS AND	)	CASE NO.
ELECTRIC COMPANY AND KENTUCKY	)	2021-00393
UTILITIES COMPANY	)	

## 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 (LG&E/KU), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than August 8, 2022. The Commission directs LG&E/KU 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 question to which the response is made and 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

<sup>&</sup>lt;sup>1</sup> 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).

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 refuses to furnish all or part of the requested information, LG&E/KU 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, 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 Commission Staff's Second Request for Information, Item 1 providing the model results for base load and base fuel prices that did not require carbon capture and storage (CCS) with various carbon prices. Identify the carbon price at which the model with base case load forecast and base case fuel prices would select natural gas combined cycle (NGCC) with CCS over NGCC without CCS if the model is allowed to economically select between the two generation resources.

2. Provide the probability of a loss of load event for LG&E/KU's calculated summer economic reserve margin and the probability of a loss of load event for LG&E/KU's calculated winter economic reserve margin, and explain how those probabilities were calculated.

3. Provide the levelized cost of energy (LCOE) for NGCC with CCS in 2022 and 2031 with base and high natural gas prices, as those terms were used in the IRP, and identify the costs used to calculate each such LCOE.

Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

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DATED \_\_JUL 18 2022

cc: Parties of Record

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