

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY AND LOUISVILLE GAS	)	CASE NO.
AND ELECTRIC COMPANY FOR CERTIFICATES	)	2025-00045
OF PUBLIC CONVENIENCE AND NECESSITY	)	
AND SITE COMPATIBILITY CERTIFICATES	)	

COMMISSION STAFF'S SECOND 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, 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 on May 16, 2025. The Commission directs LG&E/KU to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> 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

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<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 a timely amendment to any prior response if LG&E/KU obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which LG&E/KU fails 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 and scanned 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 the Direct Testimony of Stuart Wilson (Wilson Direct Testimony), Exhibit SAW-1, Section 4.4 Stage One: Portfolio Development, pages 29–33.

a. Perform additional PLEXOS modeling runs using identical assumptions to those in Stage One, Step One as described in Exhibit SAW-1, making no modifications, except set the "Data Center Load in Load Scenario," as that phrase is used

in Table 10 on page 31 of Exhibit SAW-1, to 1,002 MW, and provide the least cost resource portfolio, as identified by PLEXOS, in each of the five fuel price scenarios.

b. Calculate and provide the total LOLE, LOLH, and EUE for each of the least cost portfolios produced in response to Item 1(a) with the reduced load assumption but otherwise using the same assumptions used to calculate the LOLEs in Table 13 on page 34 of Exhibit SAW-1.

c. Provide the present value revenue requirement (PVRR) for each of the least cost portfolios produced in response to Item 1(a) in each fuel price scenario, accounting for the change in the load assumption, but otherwise using the same method used to calculate the PVRRs for the portfolios in Table 11 of Exhibit SAW-1, and provide the workpapers used to calculate those of those amounts, in Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible, including an updated financial model if an updated financial model was used to calculate those amounts.

2. Refer to Wilson Direct Testimony, Exhibit SAW-1, Section 4.4 Stage One: Portfolio Development, Table 10, page 31. Explain whether PLEXOS produces more than one portfolio for each scenario, such as the least cost portfolio and the second or third least cost portfolio. If so, provide the top three least cost portfolios produced by PLEXOS for each fuel and load scenario in Table 10, ranked from least to highest cost for each scenario.

3. Refer to Wilson Direct Testimony, Appendix C. Calculate the summer (March-November), winter (January-February, December), and total LOLE, LOLH, and EUE; and the PVRR (on an absolute and relative basis, compared to the proposed

portfolio) for all alternative resource portfolios. Provide the results in a table formatted like the one provided in Case No. 2022-00402<sup>2</sup> in LG&E/KU's Response to Staff's Post-Hearing Request for Information, Item 20, Attachment 1.

4. Refer to Wilson Direct Testimony, Exhibit SAW-1, page 40. Explain how LG&E/KU modeled all existing coal units that have not already been approved for retirement. Include in the explanation why certain coal units, such as Mill Creek 3 and 4 and Brown 3, were assumed to be retired, while others, such as Ghent 1-4 and Trimble 1, were not assumed to retire.

5. Refer to Wilson Direct Testimony, Exhibit SAW-1, page 18.

a. Explain what expansion of the curtailable service rider (CSR) entails.

b. Explain whether any customers have expressed interest in participating in the CSR-2 rider that are not currently participating.

c. Assume the credits to customers participating in CSR-2 increased.

Explain whether this would likely increase customer participation in the rider.

6. Explain whether LG&E/KU has considered expanding the curtailable service rider to allow customers to have an advanced notice option in anticipation of a need for curtailment.

7. Explain whether LG&E/KU is able to identify any of the data centers in contact with LG&E/KU that have secured land/leases within the service area or received

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<sup>2</sup> Case No. 2022-00402, *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates and Approval of a Demand Side Management Plan and Approval of Fossil Fuel-Fired Generating Unit Retirements.*

zoning approval. If so, explain how this factors into the economic development load forecast analysis.

8. Refer to Wilson Direct Testimony, SAW-1, page 7. Provide a resource adequacy and reliability analysis for determining the least-cost resources for serving the 2,030 MW, 1,890 MW, 1,610 MW, and 1,470 MW of load.

9. Refer to LG&E/KU's Response to Commission Staff's First Request for Information (Staff's First Request), Item 3(b). Provide a detailed explanation of why the flat economic development load growth assumption beyond 2032 is considered conservative and potentially too low. Identify, provide and explain the potential risks associated with this assumption.

10. Refer to LG&E/KU's Response to Staff's First Request, Item 5. Provide evidence or documentation supporting the claim that the listed incentives, such as the Optimized EV Charging Program, have led EV owners to change their consumption behaviors.

11. Refer to LG&E/KU's Response to Staff's First Request, Item 6. Explain why LG&E/KU chose not to include the possibility of stronger customer growth in the CPCN load forecast and dismissed it as negligible.

12. Refer to LG&E/KU's Response to Staff's First Request, Item 8.

a. Explain whether there are any updates to the response if tariff changes or uncertainty surrounding tariff changes impact the availability or supply chain for any of LG&E/KU's projects in this proceeding. In this explanation, include whether it is still true that LG&E/KU are not aware of any direct tariff-based impact on timing of current or planned construction projects. Consider this an ongoing request.

b. Provide a summary of potential impacts on contracts related to tariff-based issues, considering the concerns expressed by contract partners and the possible direct/indirect effects on project costs.

c. Explain what specific concerns contractors have raised with LG&E/KU.

13. Refer to LG&E/KU's Response to Staff's First Request, Item 14. Explain whether LG&E/KU plans to enter into long-term commitments for gas supply or transportation contracts if its application is approved.

14. Refer to LG&E/KU's Response to Staff's First Request, Item 17(a)-(c).

a. Provide a step-by-step explanation of how LG&E/KU estimated the 1,750 MW of data center load included in the 2025 CPCN Load Forecast. In this explanation, include all factors considered in making the determination, and whether the 402 MW Camp Ground Road and the 600 MW Project Lincoln data center projects are included in the 1750 MW load forecast.

b. If LG&E/KU is unable to identify data center projects included in the 1,750 MW, explain why the Commission should not consider the load as speculative for the purposes of this proceeding.

c. Refer also to LG&E/KU's Confidential Response to Kentuckians for the Commonwealth (KFTC), Kentucky Solar Energy Society (KSES), Metropolitan Housing Coalition (MHC), and Mountain Association's (MA) (collectively, Joint Intervenors) First Request for Information, Item 6a; and the Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General) and Kentucky Industrial Utility Customers' (KIUC) First Request, Item 33(a),

Attachment. Identify which projects, and the associated MW listed in the prospect and imminent phases, also have transmission service requests (TSRs) associated with their respective projects.

15. Refer to the Direct Testimony of Tim Jones (Jones Direct Testimony) page 14, lines 13-15 and Wilson Direct Testimony, page 5, line 12. Confirm that the Camp Ground Road data center and the Powerhouse and Poe Company data center are the same project. If not confirmed, explain the response.

16. Refer to LG&E/KU's response to Staff's First Request, Item 17(a). Refer also to LG&E/KU's response to Staff's First Request, Item 18(a).

a. Explain what LG&E/KU means by "near term".

b. Provide the rationale behind the 1,750 MW of data center load being a reasonable estimate.

c. Explain whether the 1,750 MW of data center load is still a reasonable estimate given the 1,252 MW data center load TSRs and the announced 1,002 MW data center projects in LG&E/KU's service area.

17. Refer to LG&E/KU's Response to Staff's First Request, Item 18(c) and LG&E/KU's response to the Attorney General and KIUC's First Request, Item 33(a), Attachment.

a. Explain whether non-economic development load follows the same five stages as economic development load. If not, explain how the process differs.

b. Provide an estimated timeline for a data center project transitioning from inquiry to announced.

c. Explain why LG&E/KU did not include the remaining 1,960 MW of non-data center projects in LG&E/KU's 2025 CPCN load forecast.

d. Provide the minimum length of time required for an economic development project to proceed through all five project stages.

e. Explain whether an economic development load always proceeds through all five stages, or whether there are instances where a specific load is assigned a later initial stage.

f. Explain whether there is a risk of a data center or other large economic development load committing to locate in LG&E/KU's service area without advancing through all five economic development stages.

g. Provide updates on each stage as economic development loads move through each stage. Consider this an ongoing request.

18. Refer to LG&E/KU's Response to Staff's First Request, Item 18(c).

a. Identify the source of the definitions of the project stages.

b. Confirm that there are no projects in the announced development stage, including the 402 MW Camp Ground Road Data Center and 600 MW Project Lincoln: OC Data Center projects. If not confirmed, explain whether these projects have signed a contract for electric service.

c. Refer also to LG&E/KU's response to Staff's First Request, Item 1(b). Explain whether the term "announced" used in this response is the same definition utilized by LG&E/KU in its economic development project stages.

d. Confirm that the 600 MW Project Lincoln data center is in the prospect phase. If confirmed, explain what the data center has left to do at the prospect stage to move to the imminent stage.

e. Identify the incentives that are negotiated in reference to the prospect stage.

f. Explain whether any of the incentives entail an incentive from LG&E/KU to the potential customer. If so, describe the incentive.

19. Refer to LG&E/KU's Response to Staff's First Request Item 19. Explain the current status of OVEC's plans for environmental compliance and the status of each compliance project.

20. Refer to LG&E/KU's Response to Staff's First Request, Item 20(d). If the U.S. Energy Information Association's (EIA)2025 price range is materially different, confirm whether LG&E/KU will update the gas price forecasts.

21. Refer to LG&E/KU's Response to Staff's First Request Item 28(c). Assuming that there is a distinction between technology/efficiency gains in computer chip power requirements for a given data center load versus increases in overall demand caused by an increase in the number of data center loads. Explain whether it is LG&E/KU's modeling assumption that increases in the number of data center customer loads and in other customer loads over time will outweigh any reductions in individual customer power demand due to computing chip efficiency gains.

22. Refer to LG&E/KU's Response to Staff's First Request, Item 28(c).

a. Explain why only 40 MW of the 2,000 MW non-data center projects in LG&E/KU's economic development pipeline is included in the 2025 CPCN Load Forecast.

b. Provide the status and detailed descriptions of these non-data center projects in LG&E/KU's economic development pipeline.

23. Refer to LG&E/KU's Response to Staff's First Request, Item 31, Attachment 04-PSC\_DR1\_LGE\_KU\_Attach\_to\_Q31\_-\_AFUDC\_FERC\_vs\_WACC.xlsx. Provide an explanation, including any calculations of amounts, for each of the assumptions used to determine the projected amounts.

24. Refer to LG&E/KU's response to Staff's First Request, Item 45. Provide the update referenced in the response.

25. Refer to LG&E/KU's response to Staff's First Request, Item 47. Explain whether a geotechnical study will be performed for the BESS or Mill Creek NGCC facility.

26. Refer to LG&E/KU's response to Staff's First Request, Item 52(a)-(c).

a. Provide a map of the alternative transmission line placement compared to the current placement for each location.

b. Provide the expected expense of transmission line relocation for each location. Include in the response if this cost is included in the original project cost estimates.

27. Refer to LG&E/KU's response to Staff's First Request, Item 54.

a. Consider this an ongoing request for this matter. Provide any communications with the Kentucky Department of Transportation, include any applications for permits, and permits granted for each of these three projects.

b. Confirm that the estimated transportation costs related to each project were included in the cost estimate and that the increased expense due to larger loads was a portion of that expense. If not included, explain why not.

28. Refer to LG&E/KU's response to Staff's First Request, Item 62(a). Explain how LG&E/KU estimated the costs of the BESS project if the technology selection has not been completed.

29. Refer to LG&E/KU's response to Staff's First Request, Item 62(a). Explain how LG&E/KU estimated the kWh expense of the BESS project if the technology selection has not been completed.

30. Refer to LG&E/KU's response to Staff's First Request, Item 62(a) and Item 67. Explain how LG&E/KU concluded that the BESS facility would not need to comply with IEEE 1578 standards in relation to electrolyte spills if technology selection is not complete and the utilities are unable to provide the safety sheets for the BESS.

31. Refer to LG&E/KU's response to Staff's First Request, Item 84. The response states that the EPC contractor will be responsible for designing the pipeline for the Brown unit.

a. Explain what role the natural gas provider will have in this process.

b. If LG&E/KU, do not know the location where the pipeline will be placed, the depth that it will be buried, nor the size of the pipe to be used, explain how it arrived at the estimated cost for this portion of the project.

c. Explain at whether the expense of the pipeline portion of the project within the facility boundaries will be recovered in the natural gas rate paid by the

companies or is this portion of the project included in the estimated cost of the project as proposed.

32. Refer to LG&E/KU's Response to Staff's First Request Item 96. Explain whether in the course of discussions with potential data center loads, any of the parties have expressed an interest in absorbing any of the costs of locating and operating in LG&E/KU's service territory to lessen the burden of the expansion on existing ratepayers.

33. Refer to LG&E/KU's Response to the Kentucky Coal Association's (KCA's) First Request, Item 6, stating that: "Despite potential data center customers not expressing interest in curtailable service, standby on-site generation, customer-owned behind-the-meter generation, participation in energy efficiency programs, or any other approaches to offset needed capacity at this time." This does not necessarily mean that they would not be interested in one or more of these subjects." If the data center customer(s) were interested in implementing or participating in each of these subjects, explain how LG&E/KU would address each subject.

34. For each proposed project included in the application, provide the following:

- a. A specific and detailed progress and construction timeline up to the proposed in-service date, including a description for each date.
- b. A specific breakdown of expected costs including but not limited to permitting, labor, equipment, third party contractor expense, natural gas pipeline.
- c. A breakdown of the total cost for each project with a corresponding kWh expense. Include in the response any workpapers, formulas in Excel format, unlocked with all information unlocked.

d. A specific breakdown of the expense of the natural gas pipeline improvements. If this expense will be passed through in an mcf rate, provide the expected natural gas mcf market rate and the natural gas mcf contract rate for each year through 2040.

35. Provide the natural gas pipeline contracts as each one relates to each proposed project.

36. Provide the overall average rate impact for the proposed projects for the period 2026 through 2040 by year. Include both the approved projects in Case No. 2022-00402<sup>3</sup> and these proposed projects in the calculation.

37. Refer to the Siting Report for the Mill Creek 6 Unit. Explain why KU/LG&E did not update its noise study even though three years have elapsed, and the surrounding area may have changed.

38. Given the length of hours of outages and generator derates and the potential for energy for purchase not being available during Winter Storm Elliott and in future, explain how a four-hour BESS would be a reasonable resource to address a potential emergency lasting for an extended period.

39. Explain why a fixed, ongoing operating cost of \$10,000,000 for the battery energy storage system (BESS) is reasonable. Include in the explanation assumptions that support the reasonableness argument.

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<sup>3</sup> Case No. 2022-00402, *Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates and Approval of A Demand Side Management Plan and Approval of Fossil Fuel-Fired Generating Unit Retirements*

40. Provide a specific list of tariff or contract provisions to protect the residential customer from paying for the expense of the generation required by a customer(s) requiring 200 MW or more.

41. Provide a summary of how federal executive orders or other regulatory decisions, from March up to the date of the response, have impacted the testimony provided in this case to this point.

42. Refer to Application at 10, and LG&E/KU's response to Louisville/Jefferson County Metro Government and Lexington-Fayette Urban County Government's First Request for Information, Item 29.

a. Explain how the resource assessment and chosen portfolio would change with the assumption that LG&E/KU would not receive an investment tax credit (ITC) for any BESS.

b. Explain how LG&E/KU's chosen resource portfolio would change if LG&E/KU made the assumption that the Inflation Reduction Act would be repealed.

43. Refer to LG&E/KU's response to Louisville/Jefferson County Metro Government and Lexington-Fayette Urban County Government's First Request for Information, Item 13. Explain why the expected retirement date for Ghent 2 does not correspond with the end of Ghent 2's useful life.

44. Refer to the Direct Testimony of Robert Conroy (Conroy Direct Testimony), page 15, lines 9–15.

a. Explain whether LG&E/KU anticipate any reduction to costs currently recovered in base rates related to the requested facilities. If so, state whether these cost reductions should also be tracked to a regulatory liability.

b. Explain whether LG&E/KU anticipates any increase to revenues or net margins from new load growth related to the requested facilities. If so, state whether these increases to revenues or net margins should also be tracked to a regulatory liability.

45. Refer to the Conroy Direct Testimony, page 16, lines 1-4. Explain the reasoning for regulatory asset treatment for depreciation expense given that depreciation will not be expensed until the projects are in service.

46. Refer to the Direct Testimony of Tim Jones, page 8. Explain why the 2025 CPCN Load Forecast did not include the high load scenario for residential customers.

47. Refer to LG&E/KU's response to the Kentucky Coal Association's First Request for Information, Item 3. Provide the anticipated completion date for this analysis.

48. Refer to LG&E/KU's response to the Attorney General and KIUC's First Request, Item 19. Reconcile the statement "the Companies will not commit to serving data center load if they cannot do so reliably" with its responsibility to provide adequate, efficient, and reasonable service to customers.

49. Refer to LG&E/KU's response to the Attorney General's and KIUC's First Request, Item 30(a).

a. Explain the potential risks for each negotiator in relation to inverter-based resource (IBR) compliance requirements.

b. Explain what efforts LG&E/KU have taken to ensure that it is minimizing its risks.

50. Refer to the Attorney General and KIUC's First Request, Item 33(a), Attachment. Of the projects in the announced phase, explain which ones are in the construction process and which are in operation.

51. Refer to LG&E/KU's response to the Attorney General and KIUC's First Request, Item 35(a).

a. Explain whether the probability ranges given to the projects are based on information LG&E/KU receives from conversations with data projects or based solely on the stage that they are in.

b. Explain how these probability ranges were used in the analysis for the economic development load forecast.

52. Refer to LG&E/KU's response to the Attorney General's First Request, Item 45a. Provide a definition for each of the statuses listed in the chart provided.

53. Refer to LG&E/KU's Response to Sierra Club's First Request for Information (Sierra Club's First Request), Item 10(g). Provide the most recent updated project profile.

54. Refer to LG&E/KU's Response to Sierra Club's First Request, Item 27(b). Explain how LG&E/KU determines when a data center customer is more likely to advance their projects versus those that appear to be speculative. Include in this explanation if this is based on economic development stage alone.

55. Refer to LG&E/KU's Response to Sierra Club's First Request, Item 40. Explain whether any current projects in the economic development project stages warrant Electromagnetic Transient (EMT) studies.

56. Refer to the Direct Testimony of John Bevington (Bevington Direct Testimony), page 14, line 17–19.

a. Explain what types of data centers are not interested in uninterrupted service.

b. Explain whether for each data center project, how LG&E/KU determines whether a data center is interested in the curtailable service offerings.

c. Assuming that data centers provide a variety of different computing services, is it reasonable to expect that with sufficient notice, some services could be scaled back.

d. Assume that a data center is participating in an interruptible service rider. If a data center required a longer interruption notice than what is provided in a CSR-2 tariff, how far in advance could LG&E/KU provide that notice.

57. Explain why LG&E/KU filed this application prior to an Engineering, Procurement and Construction (EPC) contractor being selected for any of the projects. Include in that explanation the source of the estimated EPC contractor expense for each of the projects, considering that no EPC contractor has been selected.

58. Generally, explain how LG&E/KU and its site assessment report team(s) reached the conclusion that each facility complies with KRS 278.708, when there are numerous items either undecided or not explored according to the totality of LG&E/KU's responses.

59. Explain, if LG&E/KU did not forecast load past approximately 2031-2032, as depicted in its testimony, if the companies view long-term as seven years.

60. Refer to Application at 14, paragraph 6.

a. Identify the depreciation rate by component LG&E/KU anticipates using to calculate its depreciation expense and the source of this rate.

b. Explain when LG&E/KU anticipates completing a new depreciation study. If completed, provide a copy of this study.

c. Explain whether LG&E/KU plans to update the depreciation rates when the new depreciation study is complete. If already complete, explain whether the depreciation rates reflect this study.

61. Refer to LG&E/KU's response to Staff's First Request, Item 26(c). Explain whether LG&E/KU considered installing reciprocating internal combustion engine (RICE) units.

62. Refer to LG&E/KU's response to Staff's First Request, Item 30. Provide the support for the split of the load center load between LG&E and KU. Explain whether LG&E/KU plans to use the same methodology to split the loads in the future.

63. Refer to LG&E/KU's response to Joint Intervenors' First Request, Item 30. Explain whether LG&E/KU is aware of any other regulatory jurisdictions that allow Post In Service Carrying Cost (PISCC). If so, identify those jurisdictions and the specific conditions that warrant the use of the proposed PISCC regulatory treatment.

64. Refer to the Direct Testimony of David Tummonds (Tummonds Direct Testimony), page 8, line 15. Provide a detailed description of the LG&E/KU Project Management Organization that will manage the ongoing Mill Creek Unit 5 NGCC and Brown BESS construction, coincidentally with the proposed Mill Creek 6 NGCC, Brown 12 NGCC, Cane Run BESS and Ghent Unit 2 SCR construction. Include an organizational chart and description of each Project Management Organization member's specific skill sets and numbers of Full Time Equivalent employees.

65. Refer to Tummonds Direct Testimony, page 8, line 15. Please verify that LG&E/KU intends to utilize an Engineering, Procurement and Construction (EPC) contractor for all phases of the Mill Creek Unit 5 NGCC and Brown BESS construction,

concurrently with the proposed Mill Creek 6 NGCC, Brown 12 NGCC, Cane Run BESS and Ghent Unit 2 SCR construction.

66. Refer to the Application, Exhibit 7, SAR 2.1.1. Provide any and all correspondence with all impacted local firefighting organizations indicating their commitment to respond to a BESS fire at Brown and/or Cane Run.

67. Provide the expected impact each of the major projects, including the Mill Creek Unit 6 NGCC, Brown Unit 12 NGCC, Cane Run BESS and Ghent Unit 2 SCR, will have on average residential monthly rates.

68. Refer to LG&E/KU's Response to Sierra Club's First Request, Item 13(g) and the Excel spreadsheet titled CONFIDENTIAL\_20250226\_FinancialModel\_01\_Stage1Step2\_0336 (SAW-2 Confidential Financial Model), produced with Wilson Direct Testimony PivotResults tab. Identify what each of the portfolios identified using shorthand in Columns D through G, such as those in Columns D through G, Row 5.

69. Refer to LG&E/KU's Response to Sierra Club's First Request, Item 13(g) and Wilson Direct Testimony, SAW-2 Confidential Financial Model, Model tab.

- a. Explain what the amounts in Column AF refer to.
- b. Explain how LG&E/KU determined the number of years to discount.
- c. Explain whether the discount rate is based on LG&E/KU's current weighted average cost of capital (WACC).
- d. Explain how LG&E/KU chose the base year of all costs.

*Linda Bridwell RP*

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DATED APR 30 2025

cc: Parties of Record

Case No. 2025-00045

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