

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
FOR CERTIFICATES OF PUBLIC)	CASE NO.
CONVENIENCE AND NECESSITY AND SITE)	2022-00402
COMPATIBILITY CERTIFICATES AND)	
APPROVAL OF A DEMAND SIDE MANAGEMENT)	
PLAN AND APPROVAL OF FOSSIL FUEL-FIRED)	
GENERATING UNIT RETIREMENTS)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS

Kentucky Industrial Utility Customers (KIUC), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 4, 2023. The Commission directs KIUC 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

¹ 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).

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.

KIUC shall make timely amendment to any prior response if KIUC 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 KIUC fails or refuses to furnish all or part of the requested information, KIUC 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, KIUC 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 Lane Kollen (Kollen Direct Testimony), page 19, line 18, through page 20, line 1, in which you recommend that the Commission deny the Solar PPAs because solar purchase power agreements (PPAs) "do not improve system reliability and resiliency compared to the retiring units," and thus do not meet the

requirements in KRS 278.264. Given the loss of load expectation (LOLE) modeled in Exhibit SB4-1, Portfolios 0, 7, and 8 that include the solar PPAs, explain your reasoning that solar PPAs do not improve reliability and resiliency.

2. Refer to Kollen Testimony, page 19, line 15, through page 20, line 1, regarding whether the solar PPAs are subject to the rules of KRS 278.264 because the solar PPAs are replacement resources for retiring coal units.

a. Explain in greater detail how you define “replacement resources” and how it would be determined whether a new resource would be categorized as a replacement resource versus another type of resource.

b. Based on your definition of replacement resources, state how you categorize the solar PPAs.

c. Explain whether the solar PPAs would be considered a replacement resource if Exhibit SB4-1, Portfolio 7 was implemented to replace coal and, at a later date, the solar PPAs were added.



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DATED JUL 27 2023

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