

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 METROPOLITAN HOUSING COALITION, KENTUCKIANS FOR THE
COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY,
AND MOUNTAIN ASSOCIATION

Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association (Joint Intervenors), 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 Joint Intervenors 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

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).

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.

Joint Intervenors shall make timely amendment to any prior response if Joint Intervenors obtain 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 Joint Intervenors fail or refuse to furnish all or part of the requested information, Joint Intervenors 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, Joint Intervenors 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 Jim Grevatt (Grevatt Direct Testimony), page 10, line 13. Provide copies of analyses or studies that quantify the benefits of

demand-side management and energy efficiency (DSM/EE) programs in reducing capacity requirements.

2. Refer to Grevatt Direct Testimony, page 10, line 19. Provide copies of analyses or studies that quantify the benefits of DSM/EE programs about reliability from a grid perspective.

3. Refer to the Direct Testimony of Anna Sommer (Sommer Direct Testimony), page 50, lines 12–18. Explain whether portfolio re-optimization is necessary for LG&E/KU to identify the least cost, least risk portfolio under the proposed new GHG rules.

4. Refer to Sommer Direct Testimony, page 50, lines 16–18. Explain in further detail why you believe LG&E/KU's approach of limiting the natural gas combined cycles (NGCCs) to a capacity factor of 50 percent is an insufficient method for identifying a least cost, least risk portfolio.

5. Refer to Sommer Direct Testimony, page 28, line 7, through page 29, line 2. Without asking for a legal opinion, explain whether the two portfolios you developed, Renewables Plus MC2 Conversion and Renewables Plus One NGCC, fully comply with all of the requirements of KRS 278.264, and describe how each of the following requirements is met by each portfolio:

a. That the replacement generating capacity for the retiring unit is dispatchable, will maintain or improve system reliability and resilience, and will maintain sufficient reserve margins;

b. That the unit retirement will not harm utility ratepayers;

c. That the unit retirement does not result from federal financial incentives or benefits; and

d. That the unit retirement will result in cost savings for customers after accounting for all known direct and indirect costs of the retirement.



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DATED JUL 27 2023

cc: Parties of Record

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