

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 FOURTH 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 June 27, 2025. 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

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).

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 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 LG&E/KU's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 14(a). Explain the basis of the weightings and probabilities used to determine the economic development queue. As part of the response, include any scoring templates, rubrics, or other related material utilized in determining the economic development queue.

2. Refer to LG&E/KU's response to Staff's Second Request, Item 48. The response states that LG&E/KU would not commit to serve a new load unless it could do so "reliably". Explain specifically what "reliably" means in this context. Provide the quantitative measure that would be used to assess reliability in this case.

3. Refer to LG&E/KU's response to the Attorney General's and Kentucky Industrial Utility Customers' Second Request for Information, Item 18(a). LG&E/KU evaluated the uncertainty in the economic development load by assessing the impact of a +/-280 MW variation in the load. Provide the basis of the 280 MW used for this assessment and explain whether other load points were considered.

4. Refer to the Direct Testimony of Lonnie Bellar, page 11, lines 7-11:

a. Explain whether the Unit Reservation Agreement payment of \$25 million is recoverable if the Brown 12 NGCC project is not approved.

b. Provide a summary of all other unrecoverable costs, including preliminary engineering costs that LG&E/KU have committed to during the Certificate of Public Convenience and Necessity (CPCN) Application process.

5. Refer to the Direct Testimony of Charles Schram. Provide the incremental increased cost to provide natural gas service to support the Mill Creek Unit 6 and Brown Unit 12 Natural Gas Combined Cycle (NGCC) projects.

6. Refer to the Direct Testimony of Phillip Imber, page 9, lines 15-16. Recognizing that the Environmental Protection Agency (EPA) Administrator Lee Zeldin continues to refine the recommended modifications to the Current EPA Ozone National Ambient Air Quality Standards (NAAQS) regulations, provide the latest EPA position as it relates to the current 2015 Ozone NAAQS regulations.

7. Refer to the Direct Testimony of David Tummonds, page 7: Recognizing the anticipated long construction period associated with the Mill Creek Unit 6 and Brown Unit 12 projects, provide a detailed description of the receipt inspection and secure storage process that the Engineering, Construction and Procurement (EPC) will utilize during construction.

8. Refer to the June 2, 2025 WDRB article titled *Group Scraps Oldham County data center plan in favor of new site, smaller project*. https://www.wdrb.com/in-depth/group-scraps-oldham-county-data-center-plan-in-favor-of-new-site-smaller-project/article_618befd2-e634-443e-b3ab-5309483cc1c0.html. Refer also to Stuart Wilson's Direct Testimony at 4. Refer also to LG&E/KU's Application, pages 6-7. Refer also to LG&E/KU's response to Commission Staff's First Request for Information, Item 1(b).

a. State whether LG&E/KU is aware of the article and its contents. If not, state whether LG&E/KU are aware of the Oldham County Data Center Project, titled Project Lincoln, news that it intends to relocate and downsize the proposed data center.

b. If LG&E/KU are aware of the news regarding Project Lincoln, state if, and when, LG&E/KU were informed of the Project regarding its intention to downsize.

c. State whether LG&E/KU know what size, in MW, the new projected load will be for Project Lincoln.

d. State whether LG&E/KU believe that, based on the news article referenced above or other conversations with Project Lincoln developers, Project Lincoln

will be delayed. If so, provide the closest estimate the Companies have for the completion of Project Lincoln and when LG&E/KU believe they will be required to serve the data center load.

e. State what, if any, impact a reduction in load from the Project Lincoln data center has on LG&E/KU's load forecast including the economic development load forecast. As part of the response, discuss whether any impact on the load forecast because of the Project Lincoln reported reduction would be material.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **JUN 10 2025**

cc: Parties of Record

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Honorable David Edward Spenard
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KY 40202

*Joshua Smith
Sierra Club
2101
Webster St. , Suite 1300
Oakland, CA 94612

*Ashley Wilmes
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KY 40602

*Honorable W. Duncan Crosby III
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KY 40202-2828

*Kristin Henry
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street
Suite 1300
Oakland, CA 94612

*Honorable Allyson K Sturgeon
Vice President and Deputy General Counsel-
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202

*Thomas J FitzGerald
Counsel & Director
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KY 40602

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Bethany Baxter
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KY 40507

*James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY 40507

*Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Honorable William H May, III
Attorney at Law
Hurt, Crosbie & May PLLC
The Equus Building
127 West Main Street
Lexington, KY 40507

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
425 Walnut Street
Suite 2400
Cincinnati, OH 45202

*William H May, III
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KY 40507

*Joe F. Childers
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KY 40507

*Honorable Matthew R Malone
Attorney at Law
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KY 40507

*Byron Gary
Kentucky Resources Council, Inc.
Post Office Box 1070
Frankfort, KY 40602

*John Horne
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KY 40601-8204

*Nathaniel Shoaff
Sierra Club
2101
Webster St. , Suite 1300
Oakland, CA 94612

*Rick E Lovekamp
Manager - Regulatory Affairs
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202

*Sara Judd
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202

*Robert Conroy
Vice President, State Regulation and Rates
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202

*Toland Lacy
Office of the Attorney General
700 Capital Avenue
Frankfort, KY 40601

*Rebecca C. Price
Sturgill, Turner, Barker & Moloney
155 East Main Street
Lexington, KY 40507

*Tony Mendoza
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street
Suite 1300
Oakland, CA 94612

*Randal A. Strobo
Strobo Barkley PLLC
239 South 5th Street
Ste 917
Louisville, KY 40202

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY 40507

*Simon Mahan
Southern Renewable Energy Association
11610 Pleasant Ridge Road
Suite 103
Little Rock, AR 72223

*Whit Cox
Southern Renewable Energy Association
11610 Pleasant Ridge Road
Suite 103
Little Rock, AR 72223

*Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010