

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 FIRST REQUEST FOR INFORMATION
TO JOINT INTERVENORS

Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Metropolitan Housing Coalition, and Mountain Association (collectively, 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 July 3, 2025. 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 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.

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 Sean O'Leary (O'Leary Direct Testimony), page 7. Explain what, if any, impact having a unit reservation agreement would have on the price/kW.

2. Refer to O'Leary Direct Testimony, page 2. Explain whether witness O'Leary has a recommendation on how many MW of data center load growth should be

reflected in Louisville Gas & Electric Company and Kentucky Utilities Company's (jointly, LG&E/KU) load forecast.

3. Refer to the Direct Testimony of John W. Chiles (Chiles Direct Testimony), page 6.

a. Provide the information relied on when asserting that "a 5 percent value is more typical than the 2 percent assumption" utilized by LG&E/KU. If calculations or formulas, provide the information in Excel format with the formulas and cells intact and unlocked.

b. State whether, to the best of Witness Chiles' knowledge and research, LG&E/KU relied on the 2 percent interconnection cost in Case No. 2022-00402,² or whether LG&E/KU relied on a different interconnection cost assumption.

c. State whether Witness Chiles is aware of other utilities located in Kentucky practices' regarding interconnection cost assumptions. If yes, state the utility, and whether it differed from LG&E/KU's interconnection cost assumption. Include in the answer the interconnection cost assumption utilized by that utility.

4. Refer to O'Leary's Direct Testimony, pages 5-6. Explain, in further detail, why a tariff would not fully recover the costs caused by a data center. As part of the answer detail the specific types of costs the witness believes will be passed on to residential, commercial, and industrial customers. Include any workpapers in Excel with formulas intact and cells unlocked, reports, or other resources relied on by Witness O'Leary in making the assertion.

² 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 Approval of A Demand Side Management Plan and Approval of Fossil Fuel-Fired Generating Unit Retirements*.

5. Refer to O'Leary's Direct Testimony, page 8. State whether Witness O'Leary thinks, based on the information relied on by the witness, that prices for natural gas plants will continue to increase in the next decade. If yes, state how much the price is expected to rise. If no, state how much the price is expected to decrease.

6. Refer to the Direct Testimony of Andy Eiden, page 5. Explain what avoided cost methodology other Kentucky utilities' utilize. In this explanation, provide whether this typically includes avoided transmission and distribution costs.

7. Refer to O'Leary Direct Testimony, page 4, lines 15-17. Recognizing the recent changes to the Environmental Protection Agency's position associated with the greenhouse gas regulations, explain what, if any, impact this has on witness O'Leary's position on the impact of decarbonization issues.



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DATED JUN 20 2025

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