

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 KENTUCKY COAL ASSOCIATION

Kentucky Coal Association (KCA), 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 KCA 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 person supervising the preparation of the response on behalf of the entity that 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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KCA shall make timely amendment to any prior response if KCA 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 KCA fails or refuses to furnish all or part of the requested information, KCA 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, KCA 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 Emily Medine (Medine Direct Testimony), page 13.

a. Provide any studies or supporting evidence that it is not industry practice to tie long-term pricing to each other.

b. State whether Witness Medine is aware of any other utilities or plant operators who utilizes correlating gas and coal prices in its forecasts. If yes, identify those

metrics and state whether those metrics are similar to Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company's (KU) (jointly, LG&E/KU) coal to gas ratio. If not, detail how similarly situated utilities forecast gas and coal prices.

c. Confirm whether witness Medine believes that LG&E/KU decoupling its coal and gas prices in its forecast would materially impact its least cost portfolio in this case. Explain why or why not.

2. Refer to Medine Direct Testimony, pages 6-8. Estimate when the proposed rules and rollbacks will become effective, accounting for among other items, the period of expected litigation.

3. Refer to Medine Direct Testimony, page 24. Explain whether witness Medine has a recommendation on how many MW of data center load growth should be reflected in LG&E/KU's load forecast.

4. Refer to Medine Direct Testimony, page 11, lines 19 and 20. Provide an explanation that rationalizes LG&E/KU's projected development cost of \$2,138/kW for the 645 MW CCGT² versus the most current development cost estimate of \$8,467/kW for a Small Modular Reactor (SMR).³

5. Refer to Medine's Direct Testimony, page 4, lines 9-14.

a. Explain why it would not be unduly discriminatory for the companies to request "adequate protections to the Companies traditional ratepayers" for making investments in generator resources when they do not do so for other large industrial and commercial customers seeking service.

² See Stuart Wilson Direct Testimony, Attachment SAW-1, Table 4, page 19.

³ See EIA April 2025 Assumptions to the Annual Energy Outlook 2025.

b. Provide examples of other state commissions, including any relevant cases reference, that have issued orders to their incumbent load serving entities (LSEs) to establish large load tariffs that include a requirement for financial commitments to protect customers.



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DATED **JUN 20 2025**

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