

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE 2018 INTEGRATED RESOURCE )  
PLAN OF LOUISVILLE GAS AND ) CASE NO. 2018-00348  
ELECTRIC COMPANY AND )  
KENTUCKY UTILITIES COMPANY )

**ATTORNEY GENERAL’S SUPPLEMENTAL DATA REQUESTS**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Data Requests to Louisville Gas & Electric Co. and Kentucky Utilities Co. [hereinafter jointly referred to as “LG&E-KU” or “the Companies”] to be answered by the date specified in the Commission’s Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for the Companies with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification

of the preparer or 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.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books,

schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on November 25, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 25<sup>th</sup> day of November, 2019.



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Assistant Attorney General

The 2018 Integrated Resource  
Plan of Louisville Gas and Electric Company and  
Kentucky Utilities Company  
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1. Refer to the Companies' response to AG DR 1-3(c). Provide the responses to the referenced RFP.
2. Refer to the Companies' response to AG DR 1-4(a), wherein the response states that "when a need for capacity is identified, the Companies will issue a public Request for Proposals for any and all sources of generating capacity and will evaluate all responses." Does the Companies' current IRP identify any capacity needs for either Company?
3. Refer to the Companies' response to AG DR 1-9(C) & AG DR 1-10. Do the Companies agree that actual, or expected, generation retirement decisions are an integral basis to its long-term resource planning?
4. Reference the Companies' response to AG DR 1-13, wherein it is stated, in pertinent part: "This analysis considered the availability of investment tax credits but did not assign a value to renewable energy credits. The Companies' IRP analysis did not consider gas-firing of Brown 3."
  - a. Explain whether the Companies would be able to sell solar renewable energy credits (SRECs) into voluntary markets / states.
  - b. Explain whether the Companies have sold, or hold, SRECs based on the Brown Solar unit's generation output.
  - c. Are the Companies aware of any clearinghouses that report REC and SREC values?
  - d. Given the availability of gas supply lines at Brown Station, do the Companies believe that gas firing of Brown 3 could be a viable option?
5. Reference the response to AG DR 1-14, Attachment.
  - a. Explain the meaning of the acronym "EFFATC."
  - b. Explain the numerical values provided in the cells.
6. Reference the response to AG DR 1-19.
  - a. When was the last time the Companies called a load control event?
  - b. Given the many temperature records broken during the summer of 2019, would it not have been cost-effective to have called a load control event?
  - c. Have the Companies considered recanvassing the customers who no longer have viable switches to ascertain their willingness to continue in the program? If not, why not?

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7. With regard to the Companies' Demand Conservation Program for small and large non-residential customers, explain whether the Companies have considered utilizing Intelligent Motor Controllers (IMCs) for use with business customers' air conditioning and refrigeration systems.
  - a. Confirm that at least some IMCs are designed to produce 25% reductions in electricity consumption, on a permanent basis.
  - b. Explain in detail whether the Companies believe the use of IMCs might be feasible for use through a pilot DSM program.
8. Refer to the Companies' response to AG DR 1-40 & AG DR 1-43.
  - a. Have the Companies identified specific circuits of issue in regards to power factor?
  - b. Explain the process by which the Companies identify and address power factor issues on particular circuits, including how the Companies determine the most cost-effective solutions.
9. Refer to the Companies' response to AG DR 1-80. What is the difference between UCAP, and ICAP used in conjunction with forecasted outage rates?
10. Reference IRP vol. 3, "2018 IRP Reserve Margin Analysis," p. 20, and the Companies' response to AG DR 1-91. Explain how the Companies used the scarcity price curve in the creation and conclusion of the instant IRP.
11. Reference the response to AG DR 1-24, and IRP Vol. 3, § 2.1.2. Explain why land use requirements for pumped hydroelectric facilities render pumped storage technologies unsuitable for the Companies' territory.