

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC 2021 JOINT)	
INTEGRATED RESOURCE PLAN)	CASE NO.
OF LOUISVILLE GAS AND)	2021-00393
ELECTRIC COMPANY AND)	
KENTUCKY UTILITIES COMPANY)	

**SIERRA CLUB’S POST-HEARING
REQUESTS FOR INFORMATION TO THE COMPANIES**

Pursuant to the Kentucky Public Service Commission’s (“Commission”) July 15, 2022, Order, Sierra Club hereby propounds the following Post-Hearing Requests for Information on Big Rivers Electric Louisville Gas and Electric Company and Kentucky Utilities Company (“LG&E/KU” or the “Company”) in the above-captioned proceeding. The Company shall answer these requests by no later than August 8, 2022, as provided in the aforementioned Order. Please produce the requested information—in electronic format, whenever possible—to:

Joe F. Childers
Childers & Baxter, PLLC
201 West Short Street
Suite 300
Lexington, Kentucky 40507
joe@jchilderslaw.com

If a response to a request consists of a statement that the requested information is already available to Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart(s)/table(s)/figure number(s).

In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such

destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

DEFINITIONS

Unless otherwise specified in each individual interrogatory or request, “you,” “your,” the “Company,” or “LG&E/KU,” refers to Louisville Gas and Electric Company and Kentucky Utilities Company, and its affiliates, officers, directors, employees, and agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all or each and every example of the requested information.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and copies either (1) in the possession, custody or control of the Company regardless of where located, or (2) produced or generated by, known to or seen by the Company, but now in their possession, custody or control, regardless of where located whether or still in existence.

Such “documents” shall include, but are not limited to, applications, permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made.

Without limitation, the term “control” as used in the preceding paragraphs means that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original.

“Identify” means:

(a) With respect to a person, to state the person's name, address and business relationship (e.g., "employee") vis-à-vis the Company;

(b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

"IRP" means the 2021 Integrated Resource Plan filed by the Company.

"Relating to" or "concerning" means and includes pertaining to, referring to, or having as a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

"Workpapers" are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas intact.

PRIVILEGE

If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any interrogatory or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit Sierra Club and the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, produce a "privilege log" that identifies the author, recipient, date and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable the Proposed Intervenors or the Commission to evaluate the validity of such claims.

TIME

Unless otherwise provided, the applicable time period for each of these requests for information is January 1, 2018, to the present.

REQUESTS FOR INFORMATION

1. In 2011, this Commission found that the cost per KWh of OVEC’s generation compared quite favorably to the Company’s generation costs.
 - a) Is the same true today?
 - b) Which LG&E/KU units generate electricity that cost /MWh or more?
Please produce all documents that confirm your answer.
 - c) Please provide the total operating costs per MWh for all of the coal fired and gas fired operating units operated by LG&E/KU.

2. In the email chain introduced as SC-Public-5 at the hearing, at the bottom you speak about the repeal of Ohio House Bill 6 and its impact on the subsidies to OVEC. Is OVEC still getting the subsidies from Ohio taxpayers for the operation of its two coal-fired units? Please state the amount of the subsidy.

Dated: July 18, 2022

Respectfully submitted,



Of counsel
(not licensed in Kentucky):

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Counsel for Sierra Club

CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of the SIERRA CLUB’S POST-HEARING REQUESTS FOR INFORMATION TO THE COMPAIES in this action is being electronically transmitted to the Commission on July 18, 2022; and that there are currently no parties that the

Commission has excused from participation by electronic means in this proceeding. Per the Commission's general standing Order issued in Case No. 2020-00085 on March 16, 2020, this filing will not be mailed in paper medium to the Commission.



JOE F. CHILDERS