

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

JOINT MOTION TO ADOPT CERTAIN RESPONSES TO DATA REQUESTS

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, the “Companies”) move the Kentucky Public Service Commission (“Commission”) to allow Lonnie E. Bellar, the Companies’ Chief Operating Officer, to adopt the responses to data requests filed in this proceeding sponsored by Daniel K. Arbough (regarding Ohio Valley Electric Corp. (“OVEC”) matters), Christopher D. Balmer, Michael P. Drake, and John K. Wolfe. The Companies further move the Commission to allow Christopher M. Garrett, the Companies’ Controller, to adopt the responses to data requests filed in this proceeding sponsored by Daniel K. Arbough that do not relate to OVEC.

The Companies further move the Commission to allow Mr. Bellar to testify at the hearing scheduled in this proceeding instead of Messrs. Arbough (regarding OVEC matters), Balmer, Drake, and Wolfe, and further to allow Mr. Garrett to testify instead of Mr. Arbough regarding non-OVEC matters relevant to Mr. Arbough’s responses to data requests.

In support of this motion, the Companies state that allowing these adoptions and testimony substitutions are necessary in part due to recent retirement and role change events, and they will increase the administrative efficiency of the hearing by reducing the number of witnesses.

Further, on June 24, 2022, counsel for the Companies advised counsel for the Commission and the intervenors of this proposal by electronic mail. The Companies are not aware of any

opposition to this motion, and the Attorney General has authorized the Companies to represent that the Attorney General does not oppose this motion.

WHEREFORE, the Companies ask the Commission to issue an order:

1. Allowing Mr. Bellar to adopt the responses to data requests filed in this proceeding sponsored by Messrs. Arbough (regarding OVEC), Balmer, Drake, and Wolfe;
2. Allowing Mr. Garrett to adopt the responses to data requests filed in this proceeding sponsored by Mr. Arbough that do not relate to OVEC;
3. Allowing Mr. Bellar to testify at the hearing scheduled in this proceeding instead of Messrs. Arbough (regarding OVEC matters), Balmer, Drake, and Wolfe; and
4. Allowing Mr. Garrett to testify instead of Mr. Arbough regarding non-OVEC matters relevant to Mr. Arbough's responses to data requests.

Dated: July 1, 2022

Respectfully submitted,



Kendrick R. Riggs
W. Duncan Crosby III
Stoll Keenon Ogden PLLC
500 West Jefferson Street, Suite 2000
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000
Fax: (502) 627-8722
kendrick.riggs@skofirm.com
duncan.crosby@skofirm.com

Allyson K. Sturgeon
Vice President and Deputy General Counsel
PPL Services Corporation
Sara V. Judd
Senior Corporate Attorney
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
ASturgeon@pplweb.com
sara.judd@lge-ku.com
*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*

CERTIFICATE OF COMPLIANCE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on July 1, 2022; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*