

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT'S
FIRST REQUEST FOR INFORMATION TO LOUISVILLE GAS AND
ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY**

In accordance with the Public Service Commission's (Commission) November 12, 2021 Order, Louisville/Jefferson County Metro Government (Louisville Metro) propounds the following data requests upon Louisville Gas & Electric and Kentucky Utilities Company (LG&E/KU). LG&E/KU shall respond to these requests in accordance with the provisions of the Commission's November 12, 2021 Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate Louisville Metro's request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for Louisville Metro.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

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

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

7. If LG&E/KU object to any request on any grounds, please notify counsel for Louisville Metro as soon as possible.

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

9. In the event any document called for has been destroyed or transferred beyond the control of LG&E/KU, state the following: 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.

10. 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.

REQUESTS FOR INFORMATION

1. Refer to the IRP, Volume I, page 5-4, regarding the maximum 4-second demand. Provide the definition of a “maximum 4-second demand” and explain why maximum 4-second demand on January 6, 2014 from 6pm to 7pm was more than 150 MW higher than the average demand during this time frame.

2. Refer to the IRP, Volume I, page 5-11, which indicates that LG&E/KU did not directly evaluate new demand-side management (DSM) programs in the IRP. Provide an explanation as to why no new DSM programs were directly considered in the IRP.

a. Also, refer to the IRP, Volume I, pages 5-40 through 5-41, in which LG&E/KU states that DSM programs were not directly evaluated but that the IRP identifies potential opportunities for new DSM programs based on data and DSM pilot programs associated with the implementation of the Advanced Metering Infrastructure project. Provide a listing of those potential new DSM programs and the types of data and pilot programs that LG&E/KU will be relying upon.

3. Refer to the IRP, Volume I, page 5-33, regarding the increased use of electric space heating in both KU and LG&E’s territories. Explain whether the companies have identified the reason(s) for the increase use of electric space heating for new customers added since 2010 and, if so, provide the reason(s).

a. Also, refer to the IRP, Volume I, page 5-3, which states that the proliferation of electric space heating in conjunction with the potential for cold winter temperatures have caused the companies to experience annual peak demands to occur in the winter rather than in the summer. State whether the increase use of electric space heating has contributed significantly to LG&E/KU having an annual peak demand during the winter and, if so, explain how the increase use of electric space heating has caused the system demand to shift in light of the statement on page 5-33 that the average residential customer consumption in 2020 for customers added in 2019 is actually lower than that for customers added through 2010 (for KU 11,608 kWh vs. 13,583 kWh and for LG&E 10,108 kWh vs. 11,138 kWh).

4. Refer to the IRP, Volume I, page 5-41, which states that fixed operating and maintenance (O&M) costs have increased significantly from the 2018 IRP for all evaluated technologies with the exception of wind resources. Identify the various items that makeup the fixed O&M costs and explain reason(s) for fixed O&M costs increasing significantly for all evaluated technologies, except for wind resources, since the 2018 IRP.

5. Refer to the IRP, Volume I, Tables 6-4 and 6-5. For the 2018 IRP, DSM was projected to reduce summer peak demand between 236 MW and 247 MW. For the 2021 IRP, DSM was projected to reduce summer peak demand between 294 MW and 311 MW. Explain the

increase in the projected peak demand savings associated with DSM programs in the 2021 IRP as compared to the 2018 IRP.

6. Refer to the IRP, Volume I, page 6-9, regarding the Revised Cross State Air Pollution Rule, which significantly reduced the nitrogen oxide allowances issued to electric generating units in Kentucky. Provide in more detail what is meant by the statement that “[t]he reduced allocation of allowances may result in the replacement of the Companies’ non-SCR-equipped units” and identify the cost impact of this compliance measure.

7. Refer to the IRP, Volume I, pages 6-9 through 6-10, regarding the National Ambient Air Quality Standards (NAAQS) for ozone and PM_{2.5}. State whether the status for the 2015 Ozone NAAQS for Jefferson County was reclassified from marginal non-attainment to moderate non-attainment, as stated in the IRP.

8. Refer to the IRP, Volume I, page 6-12, regarding environmental justice issues. The IRP states that “[a]lthough not actively utilizing the EPA’s EJ Screen, the Companies consider environmental and economic factors in assessing and planning development activity.” Identify the factors that are considered by the U.S. EPA’s environmental justice screening tool and state whether LG&E/KU’s consideration of environmental and economic factors are reflective with those factors that are evaluated by the U.S. EPA’s environmental justice screening tool. In addition, provide some recent examples of a development activity carried out by LG&E/KU that would be consistent of the U.S. EPA’s environmental justice screening tool.

9. Refer to the IRP, Volume I, page 7-13, regarding the data collected from the Brown Solar facility. Explain what risks are associated with solar facilities that are without significant geographic diversity.

10. Refer to the IRP, Volume I, Table 8-1 on page 8-1, which shows that the reserve margin based on summer peak demand to be 44.9 percent to 47.8 percent during the 2034-2036 time frame. State whether LG&E/KU consider this level of reserve margin to be reasonable.

11. Refer to the IRP, Volume I, Table 8-2 on page 8-2, which shows that the reserve margin based on winter peak demand to be 25.9 percent to 29.8 percent during the 2034-2036 time frame. State whether LG&E/KU consider this level of reserve margin to be reasonable.

12. Refer to the IRP, Volume I, page 8-10, regarding the implementation of an online DER interconnection application portal. State when the companies anticipate fully implementing this online customer portal.

13. Refer to the IRP, Volume I, Table 8-4 on page 8-13, regarding the projected capacity factors of the companies’ generation resources. With respect to Cane Run 7, state why its projected capacity factor in 2035 is at 72 percent.

14. Refer to the IRP, Volume I, page 8-33, regarding the use of sheep as a vegetation management technique at the Brown Solar Station. Explain whether the companies were able to quantify any efficiencies or cost savings associated with the use of sheep as a form of vegetation management as compared to conventional vegetation management practices at the solar and also explain whether this technique could be scaled to apply to larger solar sites.

15. Refer to the IRP, Volume I, page 8-34, under the Data Analytics heading. Explain in more detail the companies' study with respect to methods that can be used to increase "intermittent renewable capacity."

Respectfully submitted,

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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on January 21, 2022; that the documents in this electronic filing is a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.

/s/ Quang Nguyen
Counsel for Louisville Metro