

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY TO
SOUTHERN RENEWABLE ENERGY ASSOCIATION'S
POST-HEARING REQUESTS FOR INFORMATION
DATED JULY 18, 2022

FILED: AUGUST 8, 2022

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Director – Power Supply for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Charles R. Schram

Subscribed and sworn to before me, a Notary Public in and before said County and State this 4th day of August 2022.



Notary Public
Notary Public ID No. KYNP32193


My Commission Expires:

June 25, 2025

VERIFICATION


COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **David S. Sinclair**, being duly sworn, deposes and says that he is Vice President, Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



David S. Sinclair

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 5th day of August 2022.


Notary Public
Notary Public ID No. KYNP32193

My Commission Expires:

JUNE 25, 2025

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to Southern Renewable Energy Association's
Post-Hearing Request for Information
Dated July 18, 2022**

Case No. 2021-00393

Question No. 1

Responding Witness: Charles R. Schram

Q-1. Reference: The June 2022 Request for Proposals to Sell Electric Capacity and Energy ("June 2022 RFP").

- a. How large is the anticipated procurement for the June 2022 RFP?
- b. If the Companies receive a bid of less than 100 MW, will the Companies review the bid? If yes, explain the level of review for such a bid and, if applicable, how the review differs from the review for bids of 100 MW or greater. If no, explain why not.
- c. If the Companies receive a bid for renewable and storage combined projects with less than 100 MW of storage capacity with four-hour battery storage, will the Companies evaluate the bid of these options? If yes, explain the level of review for such a bid and, if applicable, how the review differs from the review of other bids. If no, explain why not.

A-1.

- a. The Companies do not have a maximum size for procurement of capacity and energy in the June 2022 RFP. This will ultimately depend on the evaluation of the economics of the RFP responses along with any developments in environmental regulations that could affect retrofit versus replace decisions for existing generation assets.
- b. The Companies' experience in prior RFPs indicates that respondents generally do not submit nonconforming offers. Therefore, it is unlikely that the Companies will receive responses for projects slightly under 100 MW. However, regardless of project size, the Companies will initially consider and screen all responses for general attributes, including price and timing.
- c. See the response to part (b).

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to Southern Renewable Energy Association's
Post-Hearing Request for Information
Dated July 18, 2022**

Case No. 2021-00393

Question No. 2

Responding Witness: David S. Sinclair

- Q-2. Reference: The Southeastern Energy Exchange Market ("SEEM"). Will the Companies model the SEEM in their next IRP? Explain why or why not.
- A-2. Because SEEM is designed only for trading non-firm energy, not capacity, it will not impact the Companies' capacity plans. Once SEEM comes into existence, the Companies will gain experience in operating in this market and consider the benefits of modeling SEEM's potential to trade non-firm energy. Therefore, it is uncertain if the Companies will model SEEM in the 2024 IRP at this time.