

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matters of:

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

**SOUTHERN RENEWABLE ENERGY ASSOCIATION’S
POST-HEARING DATA REQUESTS TO LOUISVILLE GAS
AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY**

Comes now the Southern Renewable Energy Association (also “SREA”), by and through counsel, and, consistent with the Public Service Commission’s Order dated July 15, 2022 its Post-Hearing Data Requests to Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities Company (“KU” and collectively “Companies”).

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff or request of another party, reference to the Companies’ response to the appropriate request will be deemed a satisfactory response.
- 2) Please identify the Companies’ witness (or witnesses) who is (are) providing the response to the data request.
- 3) These requests shall be deemed continuing so as to require further and supplemental responses if the Companies receive or generate additional information within the scope of these request between the time of the response and the time prior to the conclusion of this proceeding.

- 4) If any request appears confusing, please request clarification directly from Counsel for SREA.
- 5) 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.
- 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 the Companies have any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for SREA as soon as possible.
- 8) For any document withheld on the basis of privilege, state the following: Date; author; addressee; indicated or blind copies; all person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that any document called for has been destroyed or transferred beyond the control of the Companies, 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 policy.
- 10) As the Companies discover errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document to support any changes.

WHEREFORE, SREA respectfully submits its Post-Hearing Data Requests to the Companies.

Respectfully submitted,

/s/ David E. Spenard

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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 18th day of July 2022. Pursuant to the Commission's Order in Case No. 2020-00085, *Electronic Emergency Docket Related to Novel Coronavirus Covid-19*, the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

NOTICE CONCERNING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David E. Spenard

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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.
2. Reference: The Southeastern Energy Exchange Market (“SEEM”). Will the Companies model the SEEM in their next IRP? Explain why or why not.