

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

In the Matter of:

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|------------------------------|---|---------------------|
| ELECTRONIC TARIFF FILING OF |) | |
| KENTUCKY UTILITIES COMPANY |) | CASE NO. 2022-00371 |
| FOR APPROVAL OF AN ECONOMIC |) | |
| DEVELOPMENT RIDER SPECIAL |) | |
| CONTRACT WITH BITIKI-KY, LLC |) | |

**POST-HEARING DATA REQUESTS OF JOINT INTERVENORS
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR
ENERGY SOCIETY, MOUNTAIN ASSOCIATION, AND KENTUCKY
RESOURCES COUNCIL, INC.**

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Energy Society, Mountain Association, and
Kentucky Resources Council, Inc.*

Dated: June 2, 2023

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.

10. “You” or “your” means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “KU” or “the Company” means Kentucky Utilities Company and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies.
12. “Joint Intervenors” means the Mountain Association, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Kentucky Resources Council who were granted the status of full joint intervention in this matter.
13. “Proposed Special Contract” means the proposed special contract between KU and Bitiki-KY that is at issue in this proceeding.
14. “Proposed Facility” means the facility to be constructed by Bitiki-KY in Waverly, Kentucky that is the subject of the Proposed Special Contract.
15. “Bitiki-KY” means Bitiki-KY, LLC and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, as well as any affiliated companies (including Bitiki Blockchain, LLC).

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do

not have complete information with respect to any interrogatory, 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.

6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.

7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**POST-HEARING DATA REQUESTS PROPOUNDED TO KENTUCKY UTILITIES COMPANY
BY JOINT INTERVENORS**

- 3.1. Please refer to Joint Intervenors' cross-examination of KU witness John Bevington, beginning at approximately 11:32 on May 31, 2023.
- a. Please provide copies of any of the "ongoing" communications between KU and Bitiki-KY concerning construction of the Proposed Facility that have not previously been provided in response to discovery in this case.
 - b. Please provide copies of any documents concerning Mr. Bevington's statements in his testimony that the Commission's approval of the Proposed Special Contract would result in additional expenditures by Bitiki-KY in the Proposed Facility.
 - c. Please provide copies of any documents reflecting the "contract modification" requested by Bitiki-KY and any communications between KU and Bitiki-KY concerning the requested "contract modification."
 - d. Please explain in detail whether and/or how the requested "contract modification" would modify the Proposed Special Contract, including whether and/or how Bitiki-KY's request would modify the EDR agreement at issue in this case. To the extent not provided in response to paragraphs (a) through (c) above, please provide copies of any documents in KU's possession that support this answer.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the electronic filing was submitted to the Commission on June 2, 2023; that the documents in this electronic filing are a true representations 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.



Tom FitzGerald