

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)
KENTUCKY UTILITIES COMPANY AND)
LOUISVILLE GAS AND ELECTRIC COMPANY)
FOR CERTIFICATES OF PUBLIC CONVENIENCE) CASE No. 2022-00402
AND NECESSITY AND SITE COMPATIBILITY)
CERTIFICATES AND APPROVAL OF A DEMAND)
SIDE MANAGEMENT PLAN)

**POST-HEARING DATA REQUESTS OF JOINT INTERVENORS METROPOLITAN
HOUSING COALITION, KENTUCKIANS FOR THE COMMONWEALTH,
KENTUCKY SOLAR ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION TO
LOUISVILLE GAS AND ELECTRIC AND KENTUCKY UTILITIES COMPANY**

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September 01, 2023

DEFINITIONS

1. Unless otherwise specified in each individual interrogatory or request, the terms “you,” “your,” “LG&E,” “KU,” “LG&E/KU,” or “Companies” refer collectively to Louisville Gas & Electric Company and Kentucky Utilities Company, including any affiliated companies, predecessors-in-interest, employees, authorized agents, outside consultants or contractors, or other representatives.
2. “LG&E” means Louisville Gas & Electric Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies.
3. “KU” means Kentucky Utilities Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including Pennsylvania Power and Light.
4. “The Companies” means LG&E and KU.
5. “Joint Intervenors” or “JI” means the Metropolitan Housing Coalition, Mountain Association, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society, who were granted the status of full joint intervention in this matter.
6. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.
7. 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.
8. 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.
9. 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.
10. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
11. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
12. 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.

13. “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.

14. “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.

15. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.

16. “EPC” means “Engineering, Procurement, and Construction.”

17. “RFP” means Request for Proposals.

18. “BESS” means “battery electric storage system.”

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. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
5. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
6. 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.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).
8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.

9. 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.

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

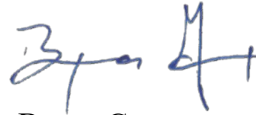
**POST-HEARING DATA REQUESTS PROPOUNDED TO LOUISVILLE GAS
AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY
BY JOINT INTERVENORS**

- 4-1. Please refer to Joint Intervenors' cross-examination of the Companies' Witness Bellar, from approximately 4:16 p.m. to 4:24 p.m. on August 22, 2023.
 - a. Please provide a copy of any responses received to the EPC contractor RFP.
 - b. Please provide a copy of any documents that the Companies provided to potential respondents to the EPC contractor RFP.
 - c. Please provide a copy of the "base bid" that Mr. Bellar referenced in his testimony.

- 4-2. Please refer to Joint Intervenors' cross-examination of the Companies' Witness Sinclair, beginning at approximately 1:50 p.m. on August 28, 2023.
 - a. Please identify the number of times that Trimble County Unit 5 started in calendar year 2022.
 - b. Please identify Trimble County Unit 5's capacity factor in calendar year 2022.
 - c. Please identify the number of times that Brown Unit 5 started in calendar year 2022.
 - d. Please identify Brown Unit 5's capacity factor in calendar year 2022.
 - e. Please refer to Rebuttal Exhibit DSS-2, Table 6, page 3 of 10.
 - i. Please identify any steps that the Companies took to validate the capacity factors and/or the number of starts of the units dispatched in the PROSYM modeling runs for the two portfolios described in Table 6 of Rebuttal Exhibit DSS-2.
 - ii. Please identify, by folder and file name, any workpapers previously provided by the Companies that show the capacity factors and/or the number of starts for each of the Companies' units in the PROSYM modeling runs for the two portfolios described in Table 6 of Rebuttal Exhibit DSS-2.
 - iii. Please identify, for each of the two portfolios described in Table 6 of Rebuttal Exhibit DSS-2, the number of starts for Trimble County Unit 5 found in the PROSYM modeling run results for the year 2028.
 - iv. Please identify, for each of the two portfolios described in Table 6 of Rebuttal Exhibit DSS-2, the capacity factor for Trimble County Unit 5 found in the PROSYM modeling run results for the year 2028.

- v. Please identify, for each of the two portfolios described in Table 6 of Rebuttal Exhibit DSS-2, the number of starts for Brown Unit 5 found in the PROSYM modeling run results for the year 2028.
 - vi. Please identify, for each of the two portfolios described in Table 6 of Rebuttal Exhibit DSS-2, the capacity factor for Brown Unit 5 found in the PROSYM modeling run results for the year 2028.
 - vii. Please identify, for each of the two portfolios described in Table 6 of Rebuttal Exhibit DSS-2, the capacity factor for the Brown BESS found in the PROSYM modeling run results for the year 2028.
 - viii. Please identify, for each of the two portfolios described in Table 6 of Rebuttal Exhibit DSS-2, the number of starts for the Brown BESS found in the PROSYM modeling run results for the year 2028.
- 4-3. With reference to the Joint Intervenors' cross-examination of Ms. Isaacson, please identify the individual or individuals with the Kentucky Energy and Environment Cabinet with whom the Companies have communicated regarding adoption of a "pay as you save" (PAYS)-type program where the upfront costs to install energy-efficient equipment in a home is funded by the utility and the costs for these upgrades through a fixed monthly charge added to the utility customers' bill.
- a. Provide any documentation indicating that the state was considering proposing such a utility-financed energy efficiency program; and
 - b. Verify that the conversation was concerning a PAYS program, and not a Property Assessed Clean Energy Program (PACE) where the up-front costs to install energy-efficient equipment in a home is funded not by the utility but by government and the repayment occurs through property assessment rather than utility bill.

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 September 1, 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.

A handwritten signature in blue ink, appearing to read "Byron Gary", is written above a horizontal line.

Byron Gary