

**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 ) CASE NO. 2022-00402  
CONVENIENCE AND NECESSITY AND SITE )  
COMPATIBILITY CERTIFICATES AND )  
APPROVAL OF A DEMAND SIDE MANAGEMENT )  
PLAN AND APPROVAL OF FOSSIL FUEL-FIRED )  
GENERATING UNIT RETIREMENTS )**

**RESPONSES OF JOINT INTERVENORS  
METROPOLITAN HOUSING COALITION,  
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR  
ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION TO  
KENTUCKY COAL ASSOCIATION'S FIRST REQUESTS FOR INFORMATION  
[DATED JULY 28, 2023]**

**FILED: August 4, 2023**

**VERIFICATION**

The undersigned, Anna Sommer, being first duly sworn, deposes and says that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief, after reasonable inquiry.



Subscribed and sworn to before me by Anna Sommer this 4 day of August, 2023.

  
Notary Public

My commission expires: April 13 2027

JENNIFER E. GOLLINGER  
Notary Public, State of New York  
No. 01G06323115  
Qualified in St. Lawrence County  
Commission Expires April 13, 20 27

**JOINT INTERVENORS METROPOLITAN HOUSING COALITION,  
KENTUCKIANS FOR THE COMMONWEALTH,  
KENTUCKY SOLAR ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION**

**RESPONSE TO KENTUCKY COAL ASSOCIATION'S  
FIRST DATA REQUEST  
Dated July 28, 2023**

**Case No. 2022-00402**

**Question No. 1.1**

- Q-1.1. To the extent you conducted any independent analysis in the preparation of the testimony in Cases 22-00402 and 23-00122, please provide all assumptions related to the following:
- a. The cost of the two proposed NGCCs both with and without the NSPS requirement as proposed by the EPA in May 2023;
  - b. The cost of Firm Transportation for the NGCC's;
  - c. The forecast assumptions regarding delivered coal and natural gas prices used in the analyses;
  - d. The depreciation periods assumed for the two proposed NGCC's;
  - e. The assumptions regarding the future need for Selective Catalytic Reduction (SCR) retrofits on Mill Creek 2 and Ghent 2 given the current Stay; and
  - f. The power curves assumed in all modeling analyses.

**RESPONSE:**

- a. See "EFG Financial Workbook Renewables Plus One NGCC Confidential" in Ms. Sommer's workpapers, tabs "KU LG&E Plan" and "KU LG&E Plan CC Capital + 30%".
- b. See "EFG Financial Workbook Renewables Plus One NGCC Confidential" and search for the term "FGT".
- c. Please see "GasPrices\_Mid\_Delivered\_WithoutFixedCosts" and "CoalPrices\_Mid\_Inventory\_without" included in Mr. Stuart Wilson's workpapers.
- d. See "EFG Financial Workbook Renewables Plus One NGCC Confidential" in Ms. Sommer's workpapers.
- e. Not applicable.
- f. Not applicable.

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**Question No. 1.2**

Q-1.2. As it pertains to the previous question and assumptions used, please identify any items considered, if any, in the load forecast outside of the Blue Oval Project, the conversion to heat pumps, and EV charging including but not limited to the KU/LG&E announcement of a North American Stainless expansion, a Toyota EV assembly, expansion involving several suppliers to the Blue Oval Project, as well as associated housing starts and commercial activity in the major cities that KU/LG&E serve.

RESPONSE:

Not applicable. Ms. Sommer used the Companies' base load forecasts in all analyses conducted.

**JOINT INTERVENORS METROPOLITAN HOUSING COALITION,  
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**Question No. 1.3**

Q-1.3. Please also provide copies or URL's of any supporting documents or information for testimony filed by the witnesses regarding whether and how to determine impacts on residential customers rates in evaluating resource options.

RESPONSE:

Joint Intervenors have not offered testimony in this proceeding regarding whether and how to determine impacts on residential customers' rates in evaluating resource options. Nonetheless, Joint Intervenors do view customer impacts, including rate impacts, as an important consideration in evaluating resource options. In LG&E-KU's most-recent Integrated Resource Plan proceeding, for example, Joint Intervenors advocated for the consideration of customer impacts as part of evaluating resource options. Joint Intervenors' public comments in that regard are available through the Kentucky Public Service Commission website, Case No. 2021-00393.