

**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)	Case No. 2022-00402
FOR CERTIFICATES OF PUBLIC CONVENIENCE)	
AND NECESSITY AND SITE COMPATIBILITY)	
CERTIFICATES AND APPROVAL OF A DEMAND)	
SIDE MANAGEMENT PLAN)	

**SIERRA CLUB’S INITIAL REQUESTS FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC
COMPANY**

Sierra Club submits these Initial Requests for Information (“RFI”) to Kentucky Utilities Company and Louisville Gas and Electric Company (“KU/LG&E” or the “Companies”) in the above-captioned proceeding pursuant to the Commission’s January 6, 2023 Order. Pursuant to that Order, the Companies shall respond to these requests for information no later than March 10, 2023. Please produce the requested information in electronic format whenever possible, and to the following recipients:

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DEFINITIONS

Unless otherwise specified in each individual interrogatory or request, “you,” “your,” the “Companies,” or “KU/LG&E,” refers to Kentucky Utilities Company, Louisville Gas and Electric Company, and their affiliates, directors, officers, employees, consultants, attorneys, and authorized agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all, each and every example of the requested information.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Control” means, without limitation, that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody or subject to your control, identify the person with possession, custody, or control. If any document was in your possession or custody or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, and originals either (1) in the possession, custody or control of the Companies regardless of where located, or (2) produced or generated by, known to or seen by the Companies, but now not in their possession, custody or control, regardless of where located or whether still in existence. Such “documents” shall include, but are not limited to, applications,

permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agendas, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications, and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made. For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original.

“Identify” means:

- a. With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) vis-à-vis the Companies;
- b. With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, to state its date, to state its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical, or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

“Person” means, without limitation, every natural person, corporate entity, partnership, association (formal or otherwise), joint venture, unit operation, cooperative, municipality, commission, governmental body, or agency.

“Relating to” or “concerning” means and includes pertaining to, referring to, or having as a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

“Workpapers” are defined as original, electronic, machine-readable, unlocked, in native format, and with formulae and links intact.

INSTRUCTIONS

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (within Ky. R. Civ. P. 34.01) of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or custody or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.
6. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.
7. If any question appears confusing, please request clarification from the undersigned counsel.

8. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.

9. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparation of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

10. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

11. Wherever the response to a request for information consists of a statement that the requested information is already available to Sierra Club, please provide a detailed citation to the document(s) and/or workpapers that contain the information. The citation shall include the title(s) of the document(s), relevant page number(s), and to the extent possible paragraph number(s) and/or chart(s)/table(s)/figure number(s).

12. In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

13. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.

14. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if

you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

15. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.

16. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

17. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.

18. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

19. Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

PRIVILEGE

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 request for information or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit meaningful evaluation of the validity of the claim. With respect to documents for which a privilege is claimed, 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 likewise enable evaluation of the validity of such claims.

REQUESTS FOR INFORMATION

- 1.1 Please provide all responses to Requests for Information issued by KU/LG&E or any other party to this proceeding.
- 1.2 Please provide all testimony, exhibits, work papers, and schedules supporting the Companies' application in electronic, machine-readable format with formulae intact, including all confidential or highly sensitive testimonies, exhibits, work papers, and schedules supporting the Companies' application.
- 1.3 Please refer to Exhibit SAW-1, sponsored by Stuart A. Wilson, at pages D-11 and D-22, Table 12 (pages 126 and 137 of the PDF). For the referenced Equivalent Load Duration Curve Model ("ELDCM"):
 - a. Provide all input and output files supporting the ELDCM (in electronic, machine-readable format with formulae intact).
 - b. For the analysis conducted by ELDCM, provide all documents, analyses, or forecasts relied upon to calculate or develop its responses.
- 1.4 Please refer to Exhibit SAW-1, sponsored by Stuart A. Wilson, at pages D-11 and D-23, Table 13 (pages 126 and 138 of the PDF). For the referenced Strategic Energy Risk Valuation Model ("SERVM") minimum reserve margin target analysis:
 - a. Provide all input and output files supporting SERVM (in electronic, machine-readable format with formulae intact).
 - b. For the analysis conducted by SERVM, provide all documents, analyses, or forecasts relied upon to calculate responses.
- 1.5 Please refer to Exhibit SAW-1, sponsored by Stuart A. Wilson, at page D-12 (page 127 of the PDF), footnote 14.
 - a. Provide all documents, analyses, or forecasts that the Companies used to "ma[k]e" "adjustments . . . to the neighboring regions' generating portfolios as needed to reflect planned retirements and meet the neighboring regions' target reserve margins."
 - b. Describe how KU/LG&E made these adjustments in the reserve margin analysis.
- 1.6 Please refer to Exhibit SAW-1, sponsored by Stuart A. Wilson, at pages D-12 to D-13 (pages 127 to 128 of the PDF).
 - a. Provide all documents, analyses and workpapers, including all modeling input and output files, used to generate the equivalent forced outage rates listed in Table 3 on page D-13.
 - b. Explain why "the availability of units in neighboring regions was assumed to be consistent with the availability of units in the Companies' generating portfolio."

- 1.7 Please refer to Exhibit SAW-1, sponsored by Stuart A. Wilson, at page D-15 (page 130 of the PDF). Provide all documents, analyses and workpapers, including all modeling input and output files, used to:
 - a. Generate Table 7, Daily ATC [available transmission capacity]
 - b. “[M]odel ATC in SERVM based on this distribution”

- 1.8 Please refer to Exhibit SAW-1, sponsored by Stuart A. Wilson, at pages D-20 and D-21, figure 8 (pages 135 and 136 of the PDF). For the referenced SERVM scarcity price curve, provide:
 - a. All input and output files supporting the SERVM analysis (in electronic, machine-readable format with formulae intact).
 - b. For the analysis conducted by SERVM, provide all documents, analyses, or forecasts relied upon to calculate responses.

- 1.9 Please refer to Exhibit SAW-1, sponsored by Stuart A. Wilson, at page D-23 (page 138 of the PDF).
 - a. Please provide all documents, analyses and workpapers, including all modeling input and output files, used to:
 - i. Generate Table 14, Generation Portfolios for Capacity Contribution Analysis
 - ii. Generate Table 15, Capacity Contribution for Limited-Duration Resources. This includes all documents, analyses, or forecasts relied upon to calculate responses generated by SERVM.
 - b. Please describe the process by which KU/LG&E generated Table 14.

- 1.10 Please refer to the Direct Testimony of Stuart A. Wilson at page 19.
 - a. Please provide all documents, analyses, and workpapers that KU/LG&E relied upon to “develop[] ten total portfolios to evaluate.”
 - b. Please describe the process by which KU/LG&E developed these ten portfolios.

- 1.11 Please refer to the Direct Testimony of Stuart A. Wilson at page 22. Please provide all documents, analyses and workpapers, including all modeling input and output files, used to generate Table 5, Stress Testing (Portfolios 1-10); 2028 Summer and Winter Reserve Margins.

- 1.12 Please refer to the Direct Testimony of David S. Sinclair at page 26, lines 17-19. In response to the question, “Did the Companies consider joining an RTO as an alternative to building and/or acquiring new generation assets,” Mr. Sinclair states, “Yes,” and refers to KU/LG&E’s “recently filed RTO study.”
 - a. Provide all documents, analyses, and workpapers related to the Companies’ consideration of joining an RTO as an alternative to building and/or acquiring new generation assets.
 - i. If the Companies are not aware of any such documents, please so state.

- b. Provide any and all inputs into the modeling conducted in support of this application related to the Companies' consideration of joining an RTO.
 - i. If no such inputs exist, please so state.
 - c. Confirm that the referenced RTO study is included in Volume III of KU/LG&E's 2021 Integrated Resource Plan, Kentucky Public Service Commission Docket 2021-00393 beginning at page 84 of the pdf document, and captioned "2021 RTO Membership Analysis" dated October 2021, *available at* https://psc.ky.gov/pscecf/2021-00393/rick.lovekamp%40lge-ku.com/10192021013101/5-LGE_KU_2021_IRP_Volume_III.pdf. If not confirmed, please provide the referenced RTO study.
 - d. Please provide all workpapers and assumptions underlying the referenced RTO study, including all workpapers supporting each table and figure in the study, in their native format with all formulae unlocked.
- 1.13 Please refer to the Direct Testimony of Lonnie E. Bellar at page 6, lines 3-9. In each response to the below, indicate real or nominal dollars; and if real dollars, provide the dollar year.
- a. Provide the annual forecasted capital expenditures for the Mill Creek NGCC, net of environmental compliance costs.
 - b. Provide the annual forecasted fixed O&M costs for the Mill Creek NGCC, net of environmental compliance costs.
 - c. Provide the annual forecasted variable O&M costs for the Mill Creek NGCC, net of environmental compliance costs.
 - d. Provide the annual forecasted capital expenditures for the Brown NGCC, net of environmental compliance costs.
 - e. Provide the annual forecasted fixed O&M costs for the Brown NGCC, net of environmental compliance costs.
 - f. Provide the annual forecasted variable O&M costs for the Brown NGCC, net of environmental compliance costs.
- 1.14 Please refer to the Direct Testimony of Lonnie E. Bellar at page 3, lines 1-16. In each response to the below, indicate real or nominal dollars; and if real dollars, provide the dollar year.
- a. Provide the annual forecasted capital expenditures for Mill Creek Unit 2, net of environmental compliance costs, from this year until 2028.
 - b. Provide the annual forecasted fixed O&M costs for Mill Creek Unit 2, net of environmental compliance costs, from this year until 2028.
 - c. Provide the annual forecasted variable O&M costs for Mill Creek Unit 2, net of environmental compliance costs, from this year until 2028.
 - d. Provide the annual forecasted capital expenditures for Ghent Unit 2, net of environmental compliance costs, from this year until 2034.
 - e. Provide the annual forecasted fixed O&M costs for Ghent Unit 2, net of environmental compliance costs, from this year until 2034.

- f. Provide the annual forecasted variable O&M costs for Ghent Unit 2, net of environmental compliance costs, from this year until 2034.
 - g. Provide the annual forecasted capital expenditures for Brown Unit 3, net of environmental compliance costs, from this year until 2028.
 - h. Provide the annual forecasted fixed O&M costs for Brown Unit 3, net of environmental compliance costs, from this year until 2028.
 - i. Provide the annual forecasted variable O&M costs for Brown Unit 3, net of environmental compliance costs, from this year until 2028.
- 1.15 Please refer to the Direct Testimony of Lonnie E. Bellar at page 4, lines 10-20.
- a. Provide all documents, analyses, and workpapers to support the conclusion that “[c]ontinued operation of these units until their respective anticipated retirement dates is currently expected to require stay open costs generally consistent with historical experience,” including:
 - i. Any and all calculations of the referenced units’ stay open costs.
 - ii. Any and all calculations and analyses of the impact of the Inflation Reduction Act (“IRA”) on the units’ retirement dates.
 - b. Provide all documents, analyses, and workpapers to support the conclusion that absent extraordinary circumstances, “continued operation is expected to remain least-cost as compared to retirement and replacement.”
 - c. Provide citations to all locations in which “Mr. Wilson discusses how he considered retirements for” the units referenced at page 4, line 20.
 - d. Provide the expected depreciation date for each referenced unit.
- 1.16 Please refer to the Direct Testimony of Lonnie E. Bellar at 11.
- a. Has KU/LG&E conducted any analysis of the viability or economics of carbon capture for the Mill Creek or Brown NGCC units? If yes, please provide all documents reflecting such analyses.
 - b. Has KU/LG&E conducted any analysis of the viability, supply, or economics of burning hydrogen at the Mill Creek or Brown NGCC units? If yes, please provide all documents reflecting such analyses.
- 1.17 Please refer to the Direct Testimony of Charles R. Schram at page 5 and to Exhibit SAW-1, sponsored by Stuart A. Wilson, at page 54 (page 96 of the PDF).
- a. Provide all documentation and analyses provided by respondents to the request for proposals (“RFP”) discussing or otherwise considering the impacts of the IRA on their responses.
 - b. For all RFP responses that were revised after “the RFP proposals were received in August 2022” and “the Companies followed up with the respondents to ensure their proposals fully reflected” provisions of the IRA, a comparison of the initial RFP response and the final RFP response noting all changes between the initial RFP response and the final RFP response.

- c. Explain how the Companies considered the impacts of the IRA in their analysis of the RFP responses, including any supporting documentation, analyses, or workpapers. Please include a description of how the Companies generated Table 34 in Exhibit SAW-1 at page 54, including citations to the relevant provisions of the IRA and any relevant documentation, analyses, or workpapers.
 - d. Explain whether and, if so, how the Companies considered the impacts of the IRA in the formulation of the Companies' self-build proposals.
- 1.18 Please refer to the Direct Testimony of Tim A. Jones at page 17.
- a. Provide all documents, analyses, and workpapers used to model the impact of the IRA on the load forecast, including all documents, analyses, and workpapers used to arrive at the “assum[ption]” as to the value of “the joint impact of the IRA and DSM-EE programs.”
 - b. Describe “the IRA’s energy-efficiency provisions” considered for the analysis of the impact of the IRA on the load forecast, including with citations to the relevant provisions of the IRA.
- 1.19 Please refer to the Direct Testimony of Stuart A. Wilson at page 9, stating, “Extreme weather conditions drive a need for additional reliability considerations”; Exhibit TAJ-1, sponsored by Tim A. Jones, at page 10, stating, “customers demand even greater load for a longer duration during extreme weather events”; and Exhibit SAW-1, sponsored by Mr. Wilson, at page D-12 (page 127 of the PDF), stating, “A key aspect in developing a target reserve margin is properly considering the likelihood of unit outages during extreme weather events.”
- a. Please provide documents, analyses, and workpapers sufficient to show the scope of service interruptions for KU/LG&E during Winter Storm Elliott in December 2022 (including but not limited to interruptions on December 23, 2022), including:
 - i. The number and percentage of customers affected hourly by service interruptions
 - ii. The amount and percentage of resources offline each hour on December 23, 2022, and any other times during Winter Storm Elliott, broken down by generation category (coal, NGCC, SCCT, solar, wind, hydro, etc.)
 - b. Please provide documents sufficient to show the amount of power purchased hourly from the Midcontinent Independent System Operator (“MISO”), PJM Interconnection, and any and all other sources of power external to the Companies from December 21, 2022, to December 28, 2022, broken down by:
 - i. Hour
 - ii. Seller (i.e., MISO, PJM, or other), and
 - iii. Generation power source (i.e., coal, NGCC, SCCT, solar, wind, hydro, etc.).
- 1.20 Please refer to the Direct Testimony of David S. Sinclair at page 4, lines 1-13.

- a. To address EPA’s impending regulations, did KU/LG&E evaluate converting Mill Creek Unit 2, Ghent Unit 2, or Brown Unit 3 to burn gas? If yes, please provide all documentation reflecting such analyses. If not, why not?
 - b. Confirm that Brown Unit 3 is already equipped with SCR technology.
 - c. If Brown Unit 3 were converted to gas in future, confirm that KU/LG&E would not be required to invest in SCR technology to comply with the Good Neighbor Plan. If not confirmed, please explain.
 - d. Please provide a detailed explanation of the \$26 million maintenance costs required at Brown Unit 3 to continue operating beyond 2028.
 - e. Could any of those costs be avoided by converting Brown Unit 3 to burn gas?
 - f. Could any of the estimated \$110 million cost for SCR technology at Mill Creek Unit 2 be avoided by converting the unit to burn gas?
 - g. Could any of the estimated \$126 million cost for SCR technology at Ghent Unit 2 be avoided by converting the unit to burn gas?
 - h. Confirm that, under the proposed Good Neighbor Plan, if Mill Creek Unit 2 or Ghent Unit 2 were converted to gas, they could continue to operate outside the ozone season without SCR and without requiring credits for the emission of NOx. If not confirmed, please explain.
 - i. Confirm that, under the proposed Good Neighbor Plan, if Mill Creek Unit 2 or Ghent Unit 2 were converted to gas, they could continue to operate during the ozone season without SCR, provided that the Company has sufficient NOx credits. If not confirmed, please explain.
 - j. Has KU/LG&E evaluated whether converting Brown Unit 3, Mill Creek Unit 2, or Ghent Unit 2 to burn gas would reduce CO₂ or NOx emissions (whether total annual or hourly rates) from those units? If yes, please provide all documentation reflecting such analyses. If not, why not?
 - k. Refer to the Direct Testimony of David S. Sinclair at page 14, lines 5-6, and the Direct Testimony of Lonnie E. Bellar at page 10, lines 10-19. Has KU/LG&E evaluated the ramping speed of Brown Unit 3, Mill Creek Unit 2, or Ghent Unit 2 if they were converted to gas? If yes, please provide all documentation reflecting such analyses. If not, why not?
- 1.21 Please refer to the Direct Testimony of David S. Sinclair at page 19, lines 2-3. Confirm that converting Ghent Unit 2, Mill Creek Unit 2, or Brown Unit 3 to gas were not resource options in the referenced 2022 Resource Assessment modeling, and therefore could not have been selected. If not confirmed, please explain.
- 1.22 Refer to the Direct Testimony of David S. Sinclair at page 5 lines 4-5.
- a. Confirm that the addition of significant zero-marginal cost renewable energy and battery resources expected under the IRA are likely to drive energy market prices down. If not confirmed, please explain.
 - b. Does KU/LG&E’s 2022 Resource Assessment take into account the impacts of the IRA on energy market prices? Please explain.

- 1.23 Please refer to Exhibit CRS-1, sponsored by Charles R. Schram.
- a. Please explain why the RFP required proposals of at least 100 MW.
 - b. Please explain why “third party respondents” were not permitted to “assume access to, or utilization of, existing sites owned by the Companies for siting proposed project(s).”
 - c. Please describe any and all work on proposals for NGCC generation units, analyses for such proposals, and any other work in support of new NGCC generation units conducted by KU/LG&E from January 1, 2022, to June 21, 2022—in other words, in 2022 prior to the issuance of the RFP.
 - i. Include, in this response, any and all work on requests for NGCC interconnection evaluations. *See* Case No. 2021-00393, Southern Renewable Energy Ass’n’s Final Written Comments on KU/LG&E’s Joint Integrated Resource Plan, at page 4 & footnote 9, *available at* https://psc.ky.gov/psccef/2021-00393/rstobo%40strobobarkley.com/10072022113021/2022.10.07_SRE_A_IRP_Comments_FINAL.pdf.
 - ii. For all such work that occurred, please explain why it was conducted prior to the issuance of the RFP.
- 1.24 Please refer to the Direct Testimony of Charles R. Schram at page 12.
- a. Has KU/LG&E entered into any firm contracts for supply of gas at the Mill Creek or Brown NGCCs? If yes, please provide all such contracts.
 - b. Has KU/LG&E evaluated the reliability risk associated with the Mill Creek NGCC gas supply service on the same interstate pipeline as the Cane Run NGCC? If so, please provide all documentation reflecting such analyses.
- 1.25 Please refer to the Direct Testimony of Philip A. Imber at pages 3-4.
- a. For each of its coal-fired generation units, has KU/LG&E conducted any analysis of the potential costs to comply with EPA’s proposed Good Neighbor Plan, 87 Fed. Reg. 20,036 (Apr. 6, 2022), and timing for such costs? If so, please provide all documents reflecting such analyses for each unit. If not, why not?
 - b. Does KU/LG&E have a forecast for NOx credit costs under the Cross-State Air Pollution Rule or EPA’s proposed Good Neighbor Plan, 87 Fed. Reg. 20,036 (Apr. 6, 2022)? If yes, please provide all forecasts through 2030. If not, why not?
 - c. For each of its coal-fired generation units, has KU/LG&E conducted any analysis of the potential costs to comply with EPA’s Regional Haze Rule for the second planning period, 40 C.F.R. § 51.308, and timing for such costs? If so, please provide all documents reflecting such analyses for each unit. If not, why not?
 - d. For each of its coal-fired generation units, has KU/LG&E conducted any analysis of the compliance costs and timing to comply with EPA’s Coal Combustion Residuals Rule (“CCR Rule”), 40 C.F.R. Part 257? If so, please provide all documentation reflecting such analyses for each unit. If not, why not?

- e. For each of its coal-fired generation units, has KU/LG&E conducted any analysis of the costs and timing for such costs to comply with EPA's Effluent Limitations Guidelines ("ELG Rule"), 40 C.F.R. Part 423? If so, please provide all documentation reflecting such analyses for each unit. If not, why not?

Dated: February 17, 2023

Respectfully submitted,

Of counsel (not licensed in Kentucky)



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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's Request for Information in this action is being electronically transmitted to the Commission on February 17, 2023; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



Joe F. Childers

