

COMMONWEATH 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 AND NECESSITY AND)
SITE COMPATIBILITY)
CERTIFICATES AND APPROVAL OF A)
DEMAND SIDE MANAGEMENT PLAN)
AND APPROVAL OF FOSSIL FUEL-)
FIREED GENERATING UNIT)
RETIREMENTS)

CASE NO. 2022-00402

**SIERRA CLUB’S RESPONSES TO THE KENTUCKY COAL ASSOCIATION’S
REQUEST FOR INFORMATION TO SIERRA CLUB**

Sierra Club submits these responses to the Kentucky Coal Association’s Request for Information to Sierra Club.

Dated: August 4, 2023

Of counsel
(not licensed in Kentucky)

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Sierra Club
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Respectfully submitted,

/s/ Joe F. Childers

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CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's response to the Kentucky Coal Association's Request for Information to Sierra Club is being electronically transmitted to the Commission on August 4, 2023; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers
JOE F. CHILDERS

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FIREED GENERATING UNIT)
RETIREMENTS)

CASE NO. 2022-00402

AFFIDAVIT OF MICHAEL GOGGIN


District of)
Columbia)

Affiant Michael Goggin, being duly sworn, states that he has personal knowledge of the matters set forth in the following responses to the Kentucky Coal Association's Request for Information to Sierra Club, and that the answers contained therein are true and correct to the best of his knowledge, information, and belief.

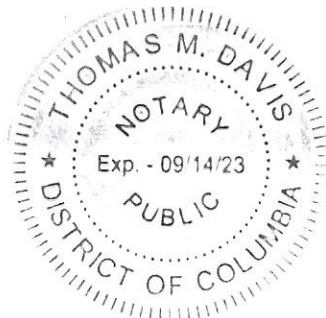


Michael Goggin

Subscribed and sworn before me on this 4 day of August, 2023.



Notary Public



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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)
ELECTRONIC JOINT APPLICATION)
OF KENTUCKY UTILITIES COMPANY)
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CASE NO. 2022-00402

AFFIDAVIT OF ANDREW LEVITT

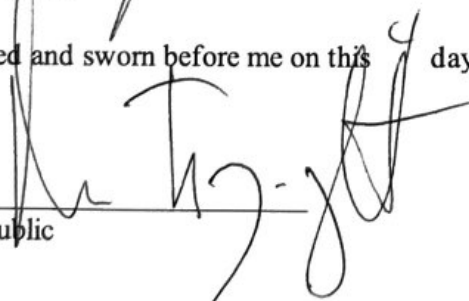
STATE of Illinois
~~Commonwealth of~~)
~~Pennsylvania~~)
County of Cook

Affiant Andrew Levitt, being duly sworn, states that he has personal knowledge of the matters set forth in the following responses to the Kentucky Coal Association's Request for Information to Sierra Club, and that the answers contained therein are true and correct to the best of his knowledge, information, and belief.

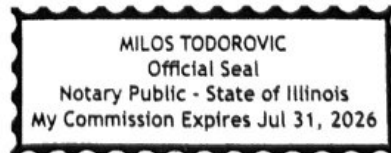


Andrew Levitt

Subscribed and sworn before me on this _____ day of August, 2023.



Notary Public



**Kentucky Coal Association
Case No. 2022-00402
Sierra Club Response to
KCA First Set Data Requests**

Request:

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. Consistent with the 2022 RTO Study, Mr. Levitt assumed a capital cost of \$921/kW for the two proposed NGCCs. The 2022 RTO Study came out prior to the 2023 EPA NSPS requirement, and therefore did not account for it. Mr. Goggin did not conduct the type of analysis described in this question.
- b. Neither Mr. Levitt nor Mr. Goggin conducted the type of analysis described in this question.
- c. Neither Mr. Levitt nor Mr. Goggin conducted the type of analysis described in this question.
- d. Mr. Levitt used a capital recovery factor of 7.6% for the two proposed NGCCs, which was based on a lifetime of 30 years. Mr. Goggin did not conduct the type of analysis described in this question.
- e. Neither Mr. Levitt nor Mr. Goggin conducted the type of analysis described in this question.
- f. Neither Mr. Levitt nor Mr. Goggin conducted the type of analysis described in this question.

Kentucky Coal Association
Case No. 2022-00402
Sierra Club Response to
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Request:

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:

Mr. Levitt did not consider or use a load forecast pertaining to the previous question. Mr. Goggin did not conduct the type of analysis described in this question.

**Kentucky Coal Association
Case No. 2022-00402
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Request:

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:

Neither Mr. Levitt nor Mr. Goggin conducted the type of analysis described in this question.