

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

In the matter of:

ELECTRONIC JOINT APPLICATION OF KENTUCKY)	CASE NO. 2022-00402
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-FIRED GENERATING)	
UNIT RETIREMENTS)	

**RESPONSES OF MERCER COUNTY FISCAL COURT TO REQUESTS FOR
INFORMATION PROPOUNDED BY THE KENTUCKY COAL ASSOCIATION**

August 4, 2023

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Q.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.

A.1.a. No such studies were performed by Mercer.

A.1.b. No such studies were performed by Mercer.

A.1.c. No such studies were performed.

A.1.d. No such studies were performed by Mercer.

A.1.e. No such studies were performed; hence no assumptions were undertaken by Mercer.

A.1.f. No power curve(s) were assumed by Mercer.

Responding Witness: Sarah Steele

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- Q.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.
- A.2. This matter was not considered by Mercer.

Responding Witness: Sarah Steele

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Q.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.

A.3. This issue was not considered by Mercer.

Responding Witness: Sarah Steele