

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	
LOUISVILLE GAS AND ELECTRIC)	CASE NO. 2022-00402
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)	
GENERATION UNIT RETIREMENTS)	

**JOINT DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO SIERRA CLUB**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to the Sierra Club to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on May 16, 2023.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, email, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, Sierra Club, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if Sierra Club receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If Sierra Club objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of Sierra Club, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

General: All Witnesses

1. In Excel spreadsheet or other format, with all formulas, columns and rows unprotected and fully accessible, please provide all workpapers and source documents not previously provided.

Witness: Michael Goggin

2. Please provide a complete copy of all testimony (including transcripts of live testimony), interviews, articles, publications, or any other public writings or statements of any kind in which Mr. Goggin supported or advocated for any entity's construction or acquisition of any fossil-fuel fired electric generating unit. If a transcript of relevant live testimony, an interview, or other public non-written statement is unavailable, please provide a link to where the video may be found.
3. Please see Mr. Goggin's testimony at pages 16-18. Please confirm that the demand and net import data shown and discussed is for the LGEE balancing area and is not data for only LG&E and KU. If not confirmed, please explain in detail.
4. Please confirm that Mr. Goggin has not conducted an analysis to determine whether importation of power during peak periods is a less costly alternative to the Companies' proposal to meet future demand. If not confirmed, please provide all documents and workpapers supporting or reflecting Mr. Goggin's analysis.
5. Please refer to Mr. Goggin's testimony on page 26 discussing the winter peak performance of solar resources. Please state whether Mr. Goggin performed an analysis of the Companies' own solar resources during Winter Storm Elliott and, if

so, summarize the results of that analysis in terms of capacity value and contribution to meeting demand during peak hours.

6. See Mr. Goggin's testimony at pages 30-31 concerning the capacity value of conventional generators. What does Mr. Goggin believe is the seasonal capacity value reduction to apply to the Companies' existing conventional generating resources?
7. Assuming the Companies retire the seven conventional generating units for which they have requested retirement authority in this proceeding, what will the Companies' capacity need be in 2028 based on the capacity values Mr. Goggin discusses for conventional units at pages 30-31 of his testimony (absent the Companies' proposed resource additions)?
8. See generally Mr. Goggin's testimony at pages 38-43 concerning the value of lost load. Can the value of lost load be greater than energy market price caps? Please explain your answer and the reasoning for it in detail.

Witness: Andrew Levitt

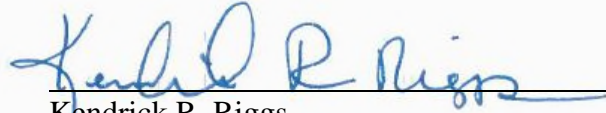
9. Please provide a complete copy of all testimony (including transcripts of live testimony), interviews, articles, publications, or any other public writings or statements of any kind in which Mr. Levitt supported or advocated for any entity's construction or acquisition of any fossil-fuel fired electric generating unit. If a transcript of relevant live testimony, an interview, or other public non-written statement is unavailable, please provide a link to where the video may be found.
10. Please explain why Mr. Levitt computed the Companies' capacity need as PJM members using a 14.7% reserve margin and ICAP capacity values rather than PJM's Performance Based Regulation and UCAP?

- a. What is the Companies' capacity need based on the process PJM currently uses?
 - b. What is the Companies' capacity need based on the capacity values Mr. Goggin discusses for conventional units at pages 30-31 of his testimony?
 - c. As the Companies consider RTO membership, is it reasonable to assess their capacity need based on these capacity values? Please explain why or why not.
 - d. What is PJM's final reserve margin following the 2023/2024 Base Residual Auction? Why does Mr. Levitt's capacity need analysis not incorporate this reserve margin?
 - e. PJM has proposed running an hourly loss of load model in the 2023 Reserve Requirement Study. Does the target reserve margin used in Mr. Levitt's analysis reflect this? If not, how would using an hourly loss of load model impact Mr. Levitt's capacity need analysis and PJM's target reserve margin going forward?
 - f. PJM has proposed expanding their weather history in reliability modelling to 50 years versus the current 28 years. How would implementing this change impact PJM's target reserve margin and Mr. Levitt's capacity need analysis?
11. Page 2, line 49 states that Mr. Levitt's assessment of the Companies' RTO Study is "preliminary." Please state whether and when it will be final and how a final assessment will be provided in this matter in accordance with the existing procedural schedule.

12. Please refer to page 28, Section II.E. Assume PJM's recently proposed seasonal capacity approach is final, fully approved, implemented, and in effect as proposed as of the date of your response. Please identify all tables and figures in Mr. Levitt's testimony that would need to be revised under that assumed scenario and please provide those revised tables and figures.
13. Please explain whether the final reforms produced by the ongoing Critical Issue Fast Path (CIFP) process alter Mr. Levitt's recommendation to join PJM.
14. Page 18, line 227 states the model LG&E-KU uses to select a target installed reserve margin model includes relatively little import capability. Given that PJM curtailed firm and non-firm exports to LGE/KU during Winter Storm Elliott on the 23rd and 24th of December 2022, is this not a reasonable assumption? Please explain your response in detail.
 - a. Please explain whether the curtailment of PJM exports to LGE-KU during Winter Storm Elliott affects Mr. Levitt's recommendation to reduce LGE-KU's winter reserve margin and join PJM.

Dated: July 28, 2023

Respectfully submitted,



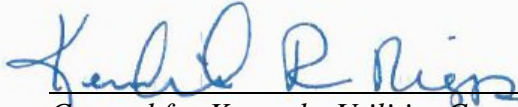
Kendrick R. Riggs
Stoll Keenon Ogden PLLC
500 West Jefferson Street, Suite 2000
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000
Fax: (502) 627-8722
kendrick.riggs@skofirm.com

Allyson K. Sturgeon
Vice President and Deputy General Counsel
Sara V. Judd
Senior Counsel
PPL Services Corporation
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
ASturgeon@pplweb.com
SVJudd@pplweb.com

*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*

CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on July 28, 2023, and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



*Counsel for Kentucky Utilities Company and
Louisville Gas and Electric Company*