

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

**In the Matter of:**

<b>ELECTRONIC JOINT APPLICATION OF</b>	)	
<b>KENTUCKY UTILITIES COMPANY AND</b>	)	
<b>LOUISVILLE GAS AND ELECTRIC</b>	)	<b>CASE NO. 2022-00402</b>
<b>COMPANY FOR CERTIFICATES OF</b>	)	
<b>PUBLIC CONVENIENCE AND NECESSITY</b>	)	
<b>AND SITE COMPATIBILITY</b>	)	
<b>CERTIFICATES AND APPROVAL OF A</b>	)	
<b>DEMAND SIDE MANAGEMENT PLAN AND</b>	)	
<b>APPROVAL OF FOSSIL FUEL-FIRED</b>	)	
<b>GENERATION UNIT RETIREMENTS</b>	)	

**JOINT DATA REQUESTS OF  
KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY  
PROPOUNDED TO  
KENTUCKY COAL ASSOCIATION, INC.**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to the Kentucky Coal Association (“KCA”) 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, KCA, 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 KCA 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 KCA 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 KCA, 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

Witness: Emily Medine

1. Attachment ESM-1 at page 2 states, “Ms. Medine prepares analyses and testimony in support of clients involved in regulatory and legal proceedings. She provides testimony in commission hearings on fuel procurement issues and arbitration proceedings on contract disputes and damages. Ms. Medine regularly speaks at industry meetings.”
  - a. Please provide a complete list of every engagement where Ms. Medine has prepared analyses and testimony in support of clients involved in regulatory and legal proceedings, including every case or docket, jurisdiction, name of the client she represented and a copy of the analysis or testimony.
  - b. Please provide a complete list of each and every engagement where Ms. Medine has prepared testimony or analysis in connection with the representation of a coal company or coal industry association, including the scope of the engagement, the forum, if any, where Ms. Medine provided any testimony or analysis and a copy of any such testimony or analysis.
  - c. Please provide a complete list of every occasion where Ms. Medine has spoken at industry meetings, including the date and location of the meeting, the name of the industry meeting and a copy her presentation or remarks.
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 Ms. Medine supported or advocated for any entity’s construction or acquisition of any natural gas 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. For each item provided (if any), please state whether Ms. Medine supported or advocated for the relevant entity's construction or acquisition of a natural gas fired electric generating unit to facilitate the retirement of, or in lieu of adding or acquiring, coal-fired generation.

3. Ms. Medine's testimony states at page 2, lines 12 -14, "The Commission denied the Companies' request for the Declaratory Judgment." Please provide the specific citation to the record in this case containing the support for this assertion.
4. Ms. Medine's testimony states at page 8, line 26, "The Companies' analyses misstate the costs for solar energy ...." Please explain in detail how and to what extent "[t]he Companies' analyses misstate the costs for solar energy." Provide any support for the assertion that the costs for solar energy are misstated in the Companies' analyses.
5. Ms. Medine's testimony states at page 16. Lines 11- 12, "My company EVA estimates that the reclassification would increase the Levelized Cost of Energy ("LCOE") by about 25 percent" and references a document titled, "UNS Electric Inc 2020 Integrated Resource Plan August 26, 2020. Provide the specific citation to UNS Electric Inc 2020 Integrated Resource Plan August 26, 2020 that supports the 25 percent value and any support work papers or reference documents. Please also provide any analysis of the application of this assertion to the Companies in this proceeding.
6. Please see Ms. Medine's testimony at page 41, Exhibit ESM-8.

- a. Please confirm that Exhibit ESM-8 presents coal prices only in nominal \$/MMBtu, not nominal \$/ton.
  - b. Please provide all workpapers for Exhibit ESM-8, including all underlying Excel or similar files with all calculations, inputs, and formulas intact.
  - c. Please provide citations and links to the EPA spreadsheets or other data sources Ms. Medine used as the source(s) of the coal prices she converted to nominal \$/MMBtu in Exhibit ESM-8.
  - d. Please provide an expanded Exhibit ESM-8 that includes the nominal \$/MMBtu values for the Companies' low gas, mid-CTG coal price forecast for the same years shown in Exhibit ESM-8.
7. Provide all workpapers and support documents for Exhibit ESM-3, Generation Forecast by Type at page 19 of Ms. Medine's testimony.
  8. In Excel spreadsheet or other format, with all formulas, columns and rows unprotected and fully accessible, provide all workpapers and source documents not previously provided.
  9. Please refer to the footnote on page 10 of Ms. Medine's testimony,<sup>1</sup> which states, "It would be useful to include in this analysis the rate impacts on Kentucky Power customers following the closure of the Big Sandy coal plant. According to a July 10, 2023 article in the Lexington Herald, Kentucky Power is asking for an 18.3 percent increase in residential rates."
    - a. Please provide a full citation and link to the cited article.

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<sup>1</sup> The footnote superscript at the bottom of the page is "55," which appears to be a typo.

- b. Please calculate and explain in detail how much of Ms. Medine’s cited request by Kentucky Power for “an 18.3 percent increase in residential rates” results from “the closure of the Big Sandy coal plant,” providing all relevant source documents, workpapers, and other supporting evidence.
  - c. Please calculate and explain in detail what change in residential rates Kentucky Power would have requested absent “the closure of the Big Sandy coal plant,” providing all relevant source documents, workpapers, and other supporting evidence.
  - d. If Ms. Medine is unable to calculate how much of Kentucky Power’s requested change in residential rates results from “the closure of the Big Sandy coal plant,” please explain what special access to Kentucky Power’s financial records and other relevant information the Companies possess that would allow them to calculate “the rate impacts on Kentucky Power customers following the closure of the Big Sandy coal plant.”
  - e. Please explain how it would be “useful” in a rate impact analysis of the Companies’ proposals in this proceeding to “include in this analysis the rate impacts on Kentucky Power customers following the closure of the Big Sandy coal plant.” Please include in your explanation a discussion of all relevant financial, operational, and rate-related differences between the utilities.
10. Please refer to Exhibit ESM-2 of Ms. Medine’s testimony.
- a. Does Ms. Medine contend the Commission should disregard the impacts of the Inflation Reduction Act (“IRA”)?

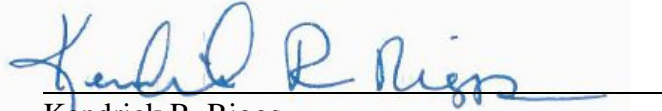
- b. Please explain the relevance of the “Pre-IRA” modeling results in Exhibit ESM-2 given that the President signed the IRA in August 2022.
- c. Is Ms. Medine aware that EPA’s IPM modeling of its baseline case that accounts for the IRA but does not include the Good Neighbor Plan or the recently proposed greenhouse gas rules shows in the SERC Central Kentucky region over 1,000 MW of coal retirements and over 1,700 MW of new natural gas combined cycle capacity being installed by 2028?<sup>2</sup>

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<sup>2</sup> See “Sensitivity – Air Quality Modeling Base Case + IRA RegionalSummary” Excel file in the “Sensitivity Air Quality Modeling Base Case + IRA” .zip file, available at <https://www.epa.gov/system/files/other-files/2023-03/Sensitivity%20Air%20Quality%20Modeling%20Base%20Case%20%2B%20IRA.zip> (accessed July 23, 2023). The EPA site for its modeling of the final Good Neighbor Plan is “Analysis of the Final Federal Good Neighbor Plan Addressing Regional Ozone Transport for the 2015 Ozone National Ambient Air Quality Standard,” available at <https://www.epa.gov/power-sector-modeling/analysis-final-federal-good-neighbor-plan-addressing-regional-ozone-transport> (accessed July 23, 2023).

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

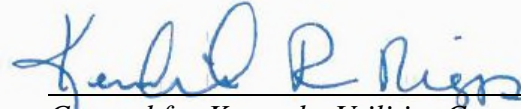
Allyson K. Sturgeon  
Vice President and Deputy General Counsel  
Sara V. Judd  
Senior Counsel  
PPL Services Corporation  
220 West Main Street  
Louisville, Kentucky 40202  
Telephone: (502) 627-2088  
Fax: (502) 627-3367  
ASturgeon@pplweb.com  
SVJudd@pplweb.com

*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.

A handwritten signature in blue ink, appearing to read "Gerald R. Rieps", is written over a horizontal line.

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