

**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 COMPANY</b>	)	
<b>FOR CERTIFICATES OF PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY AND SITE</b>	)	<b>CASE NO. 2022-00402</b>
<b>COMPATIBILITY CERTIFICATES AND</b>	)	
<b>APPROVAL OF A DEMAND SIDE</b>	)	
<b>MANAGEMENT PLAN AND APPROVAL OF</b>	)	
<b>FOSSIL FUEL-FIRED GENERATING UNIT</b>	)	
<b>RETIREMENTS</b>	)	

**RESPONSE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.  
TO JOINT DATA REQUESTS OF KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY**

Witness Mr. Lane Kollen

Q.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.

**RESPONSE:**

None.

**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 COMPANY</b>	)	
<b>FOR CERTIFICATES OF PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY AND SITE</b>	)	<b>CASE NO. 2022-00402</b>
<b>COMPATIBILITY CERTIFICATES AND</b>	)	
<b>APPROVAL OF A DEMAND SIDE</b>	)	
<b>MANAGEMENT PLAN AND APPROVAL OF</b>	)	
<b>FOSSIL FUEL-FIRED GENERATING UNIT</b>	)	
<b>RETIREMENTS</b>	)	

**RESPONSE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.  
TO JOINT DATA REQUESTS OF KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY**

Q.2 Please state whether KIUC is opposed to the Companies' proposed retirement of Haefling Units 1 and 2 and Paddy's Run Unit 12.

**RESPONSE:**

No.

**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 COMPANY</b>	)	
<b>FOR CERTIFICATES OF PUBLIC</b>	)	
<b>CONVENIENCE AND NECESSITY AND SITE</b>	)	<b>CASE NO. 2022-00402</b>
<b>COMPATIBILITY CERTIFICATES AND</b>	)	
<b>APPROVAL OF A DEMAND SIDE</b>	)	
<b>MANAGEMENT PLAN AND APPROVAL OF</b>	)	
<b>FOSSIL FUEL-FIRED GENERATING UNIT</b>	)	
<b>RETIREMENTS</b>	)	

**RESPONSE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.  
TO JOINT DATA REQUESTS OF KENTUCKY UTILITIES COMPANY AND  
LOUISVILLE GAS AND ELECTRIC COMPANY**

Q.3 Please provide additional details concerning Mr. Kollen’s proposed PPA rider discussed at pages 20-22 of his testimony, e.g., how the proposed rider would interact with the Companies’ Fuel Adjustment Clause and Off-System Sales riders, as well as the Companies’ After-the-Fact Billing process.

**RESPONSE:**

The proposed PPA rider would apply exclusively to purchased power expense incurred pursuant to PPAs for solar resources and would require Commission approval. The solar PPA rider would be stand-alone. The PPA rider would not apply to other purchased power expenses, including economy purchased power expenses, which would continue to be recoverable through the Companies’ FAC riders, subject to the limitations set forth in the FAC Rule. The proposed PPA rider would not affect the Companies’ OSS rider, except to the extent it affects the calculation of the net eligible margins determined through the after the fact billing process. The after the fact billing process would reflect the fact that the solar PPAs are take-or-pay and would therefore be deemed to be dispatched first and assigned to retail load.