

**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 :
:

**KENTUCKY COAL ASSOCIATION’S SUPPLEMENTAL REQUEST FOR
INFORMATION TO KENTUCKY UTILITY COMPANY AND LOUISVILLE GAS &
ELECTRIC COMPANY**

The Kentucky Coal Association (KCA) intervener in this action, respectfully requests the applicant, Kentucky Utilities Company and Louisville Gas and Electric Company (collectively, the “Companies”), to respond to the Supplemental Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.

B. Restate the information inquiry immediately preceding each response.

C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KCA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means the Companies or the witness, as the context requires.
2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the Companies or their officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.
3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or

attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief

that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

SUPPLEMENTAL REQUEST FOR INFORMATION OF KCA

1. In follow-up to the plan of retiring Mill Creek 1 and the three coal units proposed for closure in the CPCN, please provide any deactivation notices filed by the Companies (e.g. retirement being generally discussed in AG First Q-2 and KCA First 1-28).

2. Similar and in follow-up to AG First Q-3 addressing the retirement of coal plants, the CEO of PJM, Manu Asthana, recently expressed PJM's concern about capacity shortfalls due to retirements exceeding replacements on a UCAP (unforced capacity) basis. Do the Companies share this concern? If not, please provide supporting analysis.

3. Similar to and in follow-up to KCA First 1-20 addressing the concept of overhauling E.W. Brown 3 to extend the operation of the unit, please address and identify any efforts by the Companies to sell the three coal plants it proposes to deactivate in the CPCN.

4. Please provide the five-year forward fuel price forecasts from the last five annual budget presentations (this relates to KCA First 1-57 addressing Coal-to-Gas methodology and the response).

5. Similar to and in follow up to AG First Q-3 addressing rolling blackouts, please confirm that issues with the 8" Texas Eastern Pipeline resulted in recent rolling blackouts? If not confirmed, please provide the cause of the recent rolling blackouts.

6. The following questions relate to the 2021 IRP referenced in and in follow up on KCA First 1-18. The Opinion in PSC Case 2021-00393 includes the Commission Staff's Report on the 2021 IRP. The following statement summarizes Staff's findings. Staff provided the following 27 recommendations (articulated below as "a – aa") addressing specific problems/deficiencies in the 2021 IRP. For each recommendation, please provide in detail to

what extent the Companies have addressed the recommendations in the December 2022 Resource Assessment. For the recommendations that have not yet been addressed, please confirm the Companies' plan to do so and whether material results are expected.

Load Forecasting Recommendations

- a) Companies should expand their discussion of the underlying assumptions including supporting documentation listing known facts.
- b) Companies should continue to monitor and incorporate anticipated changes in EE impacts in their forecasts and sensitivity analyses. In addition, the Companies should not assume that current DSM-EE programs will not be renewed. Further, in the context of a long-range planning study, it would be reasonable for the Companies to model increased participate in current programs up to their current limits.
- c) Companies should expand the discussion of DERs to identify resources other than distributed solar that could potentially be adopted by customers and explain how and why those resources are expected to affect load, if at all.
- d) The Companies should expand its discussion of the projected adoption of distributed solar and its effect on load to include separate discussions of assumptions, methodology, and projections for residential, commercial, and industrial customers and separate discussions of assumptions, methodology, and projections for customers interconnected under the Companies net metering tariffs, qualifying facilities tariffs, and other similar tariffs, if any, that are adopted after this report.
- e) The Companies should analyze and discuss whether and the extent to which customers that would have taken service under the Net Metering Service-2 tariff would continue to interconnect DERs even if they received no credit for energy sent back into the system because the one percent cap had been reached when they sought to connect.

Demand-Side Resource Recommendations

- f) The Companies should identify and assess all potentially cost-effect demand side resource options.
- g) Any changes to demand-side resources should be discussed in full including a transparent analysis of the cost and benefits inputs.
- h) The Companies should describe and discuss all new demand-side resources they considered, and if a resource was considered but ultimately not included in any model or formal assessment, the Companies should explain each basis for excluding the resource.

- i) The Companies should continue the stakeholder process through the DSM Advisory Group and strive to include recommendations and inputs from the stakeholders in its demand-side resource assessment.
- j) The Companies should consider making AMI usage data that is more closely aligned to real-time data available to customers and should consider peak time rebate programs, time-of-use rates, and prepaid options for AMI customers.
- k) The Companies should consider and model more aggressive options to increase the use of the curtailable service rider and demand conservation program.
- l) The Companies should consider DSM/EE programs specifically designed to shift EV charging from peak periods.
- m) The Companies should continue to identify energy efficiency opportunities for large customers and continue to offer incentives that encourage them to adopt or maintain energy-related technologies, sustainability plans, and long-range energy planning.
- n) The Companies should continue to define and improve procedures to evaluate, measure, and verify both actual costs and benefits of energy savings based on the actual dollar savings and energy savings.
- o) The Companies should file to expand or review its current 2019-2025 DSM/EE Plan if its ongoing resource assessments indicate that doing so is the least-cost options for meeting its projected load.

Supply-Side Resources Recommendations

- p) The Companies should provide a more robust discussion of supply-side resources and should assess all potentially cost-effective resources using the resource expansion model, including nuclear generation at the end of the planning period.
- q) The Companies should describe and discuss all supply-side resources that were considered, including variations of the same resource (e.g., NGCC with and without CCS or traditional and small-cell nuclear), and if a resource was considered but ultimately not included in the resource expansion model. The Companies should explain each basis for excluding the resource, including the specific information used to support each basis such as cost estimates that resulted in a resource being excluded as too expensive or engineering concerns that resulted in a resource being excluded based on a determination that it is not reasonable.
- r) The Companies should consider resources outside of their service territories with transmission costs based on specific updated analyses of transmission costs.

- s) The Companies should consider interconnection costs and the cost of necessary network upgrades to the extent possible when assessing resources both in and outside its service territory and should describe and discuss how such costs were considered whether and how such costs were included in the resource expansion model, uncertainties associated with how such costs were considered, and if applicable, why such costs could not be included in the resource expansion model.
- t) The Companies should include a more detailed and broader explanation of potential and expected carbon regulation, given the significant effects such regulation could have on future resources including a description of potential carbon regulation that would affect the useful life or cost of any resource, an explanation of how the Companies accounted for the risk of each such regulation in its assessment of resources, e.g., modeling the cost of a resource using a shorter useful life or modeling a carbon cost, and an explanation of why the Companies accounted for risk in that manner. The potential regulations discussed should include at minimum the NSPS and carbon pricing or a carbon tax.
- u) The Companies should include additional discussion of transfer capabilities including a discussion of any known, significant conditions that restrict the Companies' ability to import energy and to serve projected load.
- v) The Companies should consider and discuss savings, if any, that could be achieved by obtaining resources owned and operated by third parties or through partnerships.
- w) The Companies should consider and discuss opportunities, if any, to partner with nearby utilities to gain experience with new generation resources, including nuclear generation.
- x) The Companies should discuss recent developments regarding OVEC, including any material upgrades or changes in O&M that have or will be required, whether the Companies believe OVEC will be economical with those upgrades or changes, and any actions the Companies have taken or plan to take, though potentially limited by the contract, to avoid such costs if they would make OVEC uneconomical for the Companies.

Integration Recommendations

- y) The Companies should use the model to optimize resource decisions throughout the planning period.
- z) Resource acquisition plans should be developed as if they would actually be implemented to meet the Companies' projected load.

aa) The Companies should include additional scenarios that compare and contrast assumptions, especially those that turn out to be primary drivers of modeling results and hence, potential directions of future capital budgets and customer bill impacts.

7. With regard to the 2021 IRP referenced in KCA First 1-18 and in follow-up please provide, subject to the NDA in the case herein, the confidential filings by the Companies in PSC Case No. 2021-00393 (the IRP case).

8. With regard to the 2021 IRP referenced in KCA First 1-18 and in follow-up, please identify how Blue Oval was considered in the IRP? Likewise, please provide any workpapers for data, results or conclusions conducted assuming the addition of 300 MW of Blue Oval subject to the NDA in the case herein as appropriate.

9. This relates to KCA First 1-57 addressing Coal-to-Gas methodology and forecasting and the responses, please provide, subject to the NDA in the case herein, any confidential filings by the Companies in PSC Case No. 2022-00038 (recent KU fuel adjustment case).

10. This following relates to KCA First 1-57 addressing Coal-to-Gas methodology and forecasting along with the 2021 IRP and respective responses (see, e.g. KCA First 1-18). With respect to fuel prices in the 2022 Resource Assessment versus the 2021 IRP, please provide the following information:

- a) Please provide for each scenario a side-by-side comparison of the actual annual fuel prices assumed in the 2021 IRP and the fuel prices assumed in the 2022 Resource Assessment.
- b) For natural gas, please provide for each scenario the assumed volatility in natural gas prices throughout each year.
- c) Please provide all comments the Companies received on the fuel price methodology employed in the 2021 IRP.
- d) Please provide the origin of the change in methodology for developing fuel prices that was adopted in the 2022 Resource Assessment.
- e) Please provide all model results from the 2022 Resource Assessment that utilized coal and natural gas price methodology employed in the 2021 IRP.

11. Related to Coal-to-Gas methodology referenced in KCA First 1-57 and the response thereto, please identify whether the Companies have changed their fuel procurement procedures in the last five years? If so, please provide the current procedures.

12. Pertaining to the 2021 IRP (following up KCA First 1-18), please confirm that the Companies assumed in the 2021 IRP that a new NSPS (new source performance standard) for natural gas generation would require carbon capture for combined cycle units and that is no longer an assumption in the 2022 Resource Assessment. Please provide the specific basis for the change in assumptions.

13. With regard to and follow-up on KCA First 1-24 addressing PPL net-zero carbon emissions target of 2050, please confirm that a net-zero plan could require carbon capture for all new and existing gas-fired capacity. If that is not the case, please explain why not.

14. With regard to and follow-up on KCA First 1-24 addressing PPL net-zero carbon emissions target of 2050, please provide an estimate of the upstream greenhouse gas emissions (including methane) on a CO2 equivalent basis for each NGCC proposed on an annual basis.

15. With respect to and follow-up on KCA First 1-26 addressing the 2022 Resource Assessment, please provide estimates of Scope 1, 2 and 3 emissions under all scenarios considered in the 2022 Resource Assessment.

16. The following questions involve the proposed solar PPAs (previously referenced in and follow-up on KCA First 1-3 and AG First Q-25).

- a. Please confirm the Companies did not consider self-build for the solar projects. If not the case, please provide how self-build was considered.
- b. Did the Companies consider Build-Own-Transfer (BOT) options. If not, why not. If yes, please provide the Companies analysis and workpapers of all BOT options.
- c. Please identify any and all differences between the four solar PPAs produced on March 15, 2023 to the four solar PPAs initially produced on March 1, 2023.
- d. Please provide for each of the four solar PPAs exactly what costs associated with the “must-take” provisions in Section 7.2 (A) were considered in the analysis. How do the Companies propose to recover said costs in rates if the “must-take” volumes exceed the amount of energy the LG&E/KU system can absorb? If these costs were not included in the Companies analyses, do the Companies have an estimate of these costs.
- e. Please identify the assumed pricing (price per megawatt-hour (MWH)) for each solar PPA that the Companies assumed when they filed this CPCN request.

17. The following questions additionally involve the proposed solar PPAs (previously referenced in and follow-up on KCA First 1-3 and AG First Q-25).

- a) Do the Companies believe that any of the projects are unlikely to proceed? If yes, which ones?

- b) Have any of the counter-parties advised the Companies of likely price increases? If yes, please indicate when this occurred and provide what the current pricing is expected to be.
- c) Have any of the counter-parties advised the Companies of possible schedule delays. If yes, please provide your best estimate of time of each project.
- d) Please provide which party (i.e., Buyer or Seller) is responsible for the transmission interconnection costs and the expected costs with respect to the PPAs.
- e) Please confirm that the Companies did not include any transmission owner interconnection costs for the Grays Branch and Nacke Pike PPAs. If not confirmed, please provide the Companies' estimates of such costs.
- f) Please confirm that the Sellers in the proposed solar agreements are not liable for performance payments related to the lost energy if their facilities are damaged. If not confirmed, please describe the compensation the Companies would receive due to the Seller's inability to fully perform under the PPAs.

18. Please provide for each proposed resource in the CPCN the status of the required air permits for the NGCC's and solar projects (e.g., follow-up to solar referenced in KCA First 1-3 and NGCC permitting being discussed in KCA First 1-11)?

19. Please provide all signed contracts related to the proposed solar, battery, and NGCC projects (e.g., follow-up to solar referenced in KCA First 1-3, NGCC permitting being discussed in KCA First 1-11 and battery being discussed in KCA First 1-66).

20. With respect to the Firm Transportation (FT) Agreements (reference to and in follow-up to the response to KCA First 1-51), please provide the following:

- 1. the basis for the numbers provided in the Companies' confidential attachment response to KCA First 1-51,
- 2. whether the Companies are willing to cap the requested recovery costs for the FT at these levels,
- 3. please provide either a draft or an outline of the expected form of the FT agreements,
- 4. whether the Companies intend to include in the FT Agreements, a no-cost option to terminate if the Companies convert the NGCC plants to hydrogen or choose to shutter the NGCCs to comply with a net zero target, and
- 5. please provide a copy of the Firm Transportation contract for Cane Run #7.

21. In follow-up on KCA First 1-55 and the Companies' response, please confirm that the Companies are not accepting any responsibility for the actual cost of construction and operation exceeding the estimated costs put forward in the CPCN? If this is not the case, please explain what risks the Companies are accepting?
22. Please confirm your understanding that the Good Neighbor Rule (GNR) rule cannot be challenged until after it is published in the Federal Register (see, e.g., KCA 1-9).
23. Please indicate whether the Companies will participate in any challenges to the GNR (See, KCA First 1-7). If no, please explain the basis for this decision.
24. Are the Companies still members of the Midwest Ozone Group (see, KCA First 1-7)? If not, please explain why.
25. Please provide your understanding as to the differences between the proposed and promulgated GNR, specifically as to how the Companies are affected (see, KCA First 1-9)?
26. In follow-up to Response to KCA First 1-4, please provide a redacted copy of the FEED proposal.
27. In follow-up to Response to KCA First 1-8, please confirm that the Companies have no documentation/notes from the referenced meeting.
28. In follow-up to Response KCA First 1-25, please provide a list of the PPL facilities.
29. In follow-up to Response KCA First 1-28, please confirm that the investments reflect both the remaining investments in plant as well as the Environmental Cost Recovery (ECR) dollars transferred to base rates and provide the remaining period for the expected recovery to occur.
30. In follow-up to Response KCA First 1-29, the question was earnings on all undepreciated capital not only on the three units the Companies are proposing to retire. Please provide, as requested, the projected earnings on all undepreciated capital under all scenarios considered.
31. In follow-up to Response KCA First 1-31, please confirm the Companies are unaware of the status of the FEED study.
32. In follow-up to Responses KCA First 1-35 through KCA First 1-39, please confirm the Companies are not pursuing options for the utilization of CO₂ if it cannot be sequestered. If not the case, please summarize current efforts. If confirmed, please explain what options the Companies would have to continue to operate the new NGCC's if a federal or Corporate Net Zero 2050 target is established and conversion to hydrogen is not economic.
33. In follow-up to Response KCA First 1-40, please provide a workable URL or the document. In addition, please confirm that the Companies have done no analysis of Section 45Q

tax credits following passage of the Inflation Reduction Act which increased and extended the credits. If not the case, please provide the updated analysis.

34. In follow-up to Response KCA First 1-43, please confirm that the Companies do not believe that the potential for either carbon capture or green hydrogen conversion are relevant to a decision to pursue this CPCN for two NGCC plants in this proceeding? If confirmed, are the Companies agreeing to waive any remaining recovery in the NGCC plants if required by law or Corporate action to retire the plants before the 40-year depreciation period is completed.

35. In follow-up to Response KCA First 1-45, please confirm that the Companies' representation that the proposed NGCC plants will be "designed to combust hydrogen in the future" is based solely on the promotional material provided by two vendors. If not confirmed, please provide the full range of information considered including relevant site-specific factors, proposals to the Companies incorporating this option, and the expected incremental costs.

36. In follow-up to Responses KCA First 1-57 and KCA First 1-58, please confirm that you cannot identify any party that uses a coal-to-gas (CTG) methodology for forecasting coal prices. To be clear, the issue is not inter-relatedness of the energy industries, it is specifically related to fuel price forecasting methodology. If not confirmed, please provide third party support for using a different methodology from the 2022 Resource Assessment. Also, please also confirm that this methodology has not been previously used by the Companies.

37. In follow-up to Response KCA First 1-60, the question did not ask about the availability of pipeline capacity. Rather it asked about natural gas availability. Please confirm that the Companies have not performed any analysis as to future natural gas availability. If not the case, please provide such analyses.

38. In follow-up to Response KCA First 1-63, please explain why the annual costs of FT are not included in the cost of the new NGCC plants when the Companies discuss the cost of the two NGCC plants as this is a cost tied to the plants not the usage of the plants.

39. In follow-up to Response JI First 1-15, please provide the current estimate of the all-in costs for each of the proposed NGCCs including capital, pipeline upgrades, FT costs, transmission upgrades and interconnections.

40. In follow-up to the prior question, please indicate which components of the current NGCC price have the greatest price uncertainty.

41. In follow-up to Response JI First 1-17, please provide assumptions in the CPCN as to the cost of capital? Have the Companies revised any of its analyses to reflect higher costs of capital since the analysis was performed.

42. In follow-up to Response JI First 1-129, please indicate whether the Companies have performed any additional analyses to reflect higher inflation rate assumptions.

43. In follow-up to Response Staff First 1-42, please provide the Companies' assumptions regarding the costs for the SCR (selective catalytic reduction) retrofits on Mill Creek 2 and Ghent 3. If these estimates are based upon firm bids, please provide. If from some other source, please provide supporting documentation.

44. Please explain in detail how the FT (see, KCA First 1-51) transportation costs are modeled in the Companies' analysis? In other words, are they included as an operating cost and are they included in dispatch decisions?

45. In follow up to Response KCA First 1-65, please confirm that your economic analysis does not consider undepreciated capital for the plants the Companies propose to retire in the NPV analyses. If not the case, please point to where these costs can be found in the documents produced by the Companies.

46. In follow-up to Response KCA First 1-69, please confirm the Companies are unwilling to perform a residential rate analysis. If confirmed, please explain why not evaluating the impact of the CPCN on residential rates is in the best interest of the residential ratepayers.

47. In follow-up to KCA First 1-68 and the response addressing a lack of a residential rate analysis, please confirm that according to the Direct Testimony of Tim A. Jones, the use of an assumed 2% per year growth in rates is being used solely for the purpose of developing a load growth forecast, not a forecast of the growth in rates. (Jones Testimony, Page 29, Lines 2-10) If that is not the case, please provide all information used to calculate the 2% per year. Also, please confirm that the Companies are not forecasting a 2% per year increase in rates.

48. In follow-up to KCA First 1-68 and the response addressing a lack of a residential rate analysis, please provide average residential customer rates for each of the last five years.

49. In follow-up to Response KCA First 1-70. If the earnings are not readily available, please provide the undepreciated capital by year under each plan.

50. Please confirm that the Companies have not performed an analysis of the rate impact of its CPCN per its response to KCA First 1-71 beyond what it provided related to the rate impact for the 2024-2030 Demand-Side Management and Energy Efficiency Program Plan filed for approval pursuant to KRS 278.285 and for specific cost recovery through the Demand-Side Management Cost Recovery Mechanism as part of this proceeding.

51. In follow-up to Commission Staff First 1-1, Staff asked whether dual fuel capability was included in the cost estimate for the proposed NGCC units. The Companies' response was "dual fuel capability was not specifically included in the cost estimate developed for the proposed NGCC units. Dual fuel capability will be requested in the Request for Proposals to NGCC unit vendors as an alternative to single fuel capability." Please address the following:

a. How the cost estimates for dual fuel capability in the CPCN were developed,

- b. The expected date of the new RFP,
 - c. Will the NGCC filing be put on hold until there is better clarity as to the costs for the proposed NGCC's.
 - d. What the Companies expect to require vis-à-vis dual fuel capability (e.g., percentage blending capability, derates at maximum blending, and costs with and without blending), and
 - e. Why it is prudent for the Commission to approve a blank check for the NGCC's with dual-fuel capability when that information is obtainable now.
52. In follow-up to Commission Staff First 1-5:
- a. Please confirm that all references to "hydrogen" are in fact to "green hydrogen". If not the case, please identify which references are not to "green hydrogen."
 - b. Please confirm that the Companies have not represented how they would define what is a "cost-effective hydrogen resource." If not the case, please provide what the Companies believe would be a "cost-effective hydrogen resource" on a dollars per MMBtu basis.
 - c. Please confirm that no OEMs are guaranteeing 100% hydrogen conversion capabilities. If not confirmed, please identify OEM's that are representing 100% conversion and, if available, the expected costs of such conversion and the expected derates with such conversion.
 - d. Please confirm that if green hydrogen is produced on site, FT would not be required. If not the case, please explain.
53. In follow-up to Commission Staff 1-9, please provide an update to the response given the changes in the promulgated GNR.
54. In follow-up to Commission Staff 1-13:
- a. Do the Companies believe that greenhouse gas (GHG) emissions associated with the production and transport of natural gas are not relevant to determining the Companies' compliance with its Net Zero targets?
 - b. Do the Companies believe they will not be required to report Scope 3 emissions at some point in the future? If not, explain why not?

Respectfully submitted,

/s/Matt Malone

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CERTIFICATE OF SERVICE

I hereby certify that KCA's April 14, 2023 electronic filing is a true and accurate copy of KCA's pleading and Read 1st Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on April 14, 2023; that an original and one copy of the filing will not be delivered to the Commission based on pandemic orders; that there are currently no parties excused from participation by electronic service; and that, on April 14, 2023, electronic mail notification of the electronic filing is provided to all parties of record:

/s/Matt Malone

ATTORNEY FOR KCA