# **COMMONWEALTH OF KENTUCKY**

### **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

) ) ) CASE NO. 2022-00402 ) )
)

# APRIL 17, 2023 SUPPLEMENTAL RESPONSE OF KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY TO THE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION DATED FEBRUARY 17, 2023

**FILED: APRIL 17, 2023** 

#### VERIFICATION

# COMMONWEALTH OF KENTUCKY ) ) COUNTY OF JEFFERSON )

The undersigned, **Lana Isaacson**, being duly sworn, deposes and says that she is Manager – Emerging Business Planning and Development for Louisville Gas and Electric Company and Kentucky Utilities Company, 220 West Main Street, Louisville, KY 40202, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge, and belief.

Lana Isaacson

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 174 day of \_\_\_\_\_\_ 2023.

Notary Public

Notary Public ID No. KYNPL3286

My Commission Expires:

amary 22, 2027



#### VERIFICATION

COMMONWEALTH OF KENTUCKY	)
	)
<b>COUNTY OF JEFFERSON</b>	)

The undersigned, Stuart A. Wilson, being duly sworn, deposes and says that he is Director, Energy Planning, Analysis & Forecasting for LG&E and KU Services Company, 220 West Main Street, Louisville, KY 40202, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Stuart A. Wilson

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 17 th day of \_\_\_\_\_ 2023.

Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

Jamary 22, 2027



### KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

### April 17, 2023 Supplemental Response to Commission Staff's First Request for Information Dated February 17, 2023

Case No. 2022-00402

**Question No. 106** 

# Responding Witness for Original Response: Stuart A. Wilson Responding Witnesses for Supplemental Response: Lana Isaacson / Stuart A. Wilson

Q-106. In Excel spreadsheet format, with all formulas, columns, and rows unprotected and fully accessible, provide all workpapers not previously provided.

### A-106. Original Response

To supplement the workpapers previously provided in Exhibit SAW-2, the Companies are providing a copy of the SERVM database backup file. This file is only functional in its native format for use in the SERVM software; therefore it is not being provided in Excel format. It was not provided previously as it is not a standard workpaper, it is very large, and it had not previously been created. But it would be necessary for anyone wanting to see the inputs used directly in the SERVM interface. See attached. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

#### April 17, 2023 Supplemental Response

In addition to the Original Response above, the Companies are providing two confidential Excel files to supplement the workpapers previously provided in Exhibit LI-6. See attached. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.