### COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC JOINT APPLICATION OF	
KENTUCKY UTILITIES COMPANY AND	
LOUISVILLE GAS AND ELECTRIC	
COMPANY FOR CERTIFICATES OF	CASE NO. 2022 00402
PUBLIC CONVENIENCE AND NECESSITY	CASE NO. 2022-00402
AND APPROVAL OF A DEMAND SIDE	
MANAGEMENT PLAN AND APPROVAL OF	
FOSSIL FUEL-FIRED GENERATING UNIT	
RETIREMENTS	

# RESPONSE OF KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY TO

LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT AND LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT'S JOINT THIRD REQUEST FOR INFORMATION TO THE JOINT APPLICANTS DATED MAY 31, 2023

**FILED: JUNE 9, 2023** 

### **VERIFICATION**

COMMONWEALTH OF KENTUCKY	)
	)
COUNTY OF JEFFERSON	)

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Chief Operating Officer for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of 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.

Lonnie E. Bellar

Subsc	ribed	and	sworn	to	before	me,	a	Notary	Public	in	and	before	said	County
and State, this	7	th.	day of		Ji	ine						2023.		

Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

### **VERIFICATION**

COMMONWEALTH OF KENTUCKY	)
	)
COUNTY OF JEFFERSON	)

The undersigned, **John Bevington**, being duly sworn, deposes and says that he is Director – Business and Economic Development for LG&E and KU Services Company, 220 West Main Street, Louisville, KY, 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.

John Bevington

Subscribed and sworn to before me, a Notary Public in and before said County

and State, this 8th day of June 2023.

Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

### VERIFICATION

COMMONWEALTH OF KENTUCKY	)
	)
COUNTY OF JEFFERSON	)

The undersigned, **David S. Sinclair**, being duly sworn, deposes and says that he is Vice President, Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of 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.

David S. Sinclair

Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

# KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Lexington-Fayette Urban County Government's and Louisville/Jefferson County Metro Government's Joint Third Request for Information to the Joint Applicants Dated May 31, 2023

Case No. 2022-00402

### Question No. 1

Responding Witness: Lonnie E. Bellar / David S. Sinclair

- Q-1. Refer to Response to Item 3 of Louisville Metro/LFUCG's Joint Supplemental Request for Information. Provide an estimate of emission reductions for year 2030 relative to 2010 with the assumption that the Company's proposal in this case is granted.
- A-1. The Companies' CO<sub>2</sub> emission reductions for the proposal align with the modeled scenarios presented in PPL's 2021 Climate Assessment Report. Figure 8 Comparison of Scenarios illustrates modeled emission reductions vs. 2010 for various operating scenarios and ranged from a minimum of 55% to a maximum of 65% by 2030. The 2030 estimated emission reductions for the proposal align with the maximum for the modeled scenarios. See also the response to PSC 2-19(c).

# KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Lexington-Fayette Urban County Government's and Louisville/Jefferson County Metro Government's Joint Third Request for Information to the Joint Applicants Dated May 31, 2023

Case No. 2022-00402

**Question No. 2** 

**Responding Witness: John Bevington** 

- Q-2. Refer to the Direct Testimony of John Bevington at page 4, regarding the PAYS program and the potential financing options for customers available under Inflation Reduction Act. Provide the status of the companies' monitoring of these financing programs and state whether the companies have identified any gaps in these financing programs that would create opportunities for the companies to develop programs to address those funding gaps.
- A-2. The Companies are continuing to monitor activities related to the Inflation Reduction Act and are unaware of any further specific guidance on energy efficiency financing programs provided by the legislation including any financing programs Kentucky may offer. Thus, the Companies cannot yet identify potential gaps that may create financing opportunities for customers.