

**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>COMPANY FOR CERTIFICATES OF</b>	)	<b>CASE NO. 2022-00402</b>
<b>PUBLIC CONVENIENCE AND NECESSITY</b>	)	
<b>AND APPROVAL OF A DEMAND SIDE</b>	)	
<b>MANAGEMENT PLAN</b>	)	

**MAY 4, 2023 SUPPLEMENTAL RESPONSE OF**  
**KENTUCKY UTILITIES COMPANY**  
**AND**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**TO**  
**THE METROPOLITAN HOUSING COALITION, KENTUCKIANS FOR THE**  
**COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY AND**  
**MOUNTAIN ASSOCIATION'S**  
**INITIAL REQUEST FOR INFORMATION**  
**DATED FEBRUARY 17, 2023**

**FILED: MAY 4, 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*  
\_\_\_\_\_  
**Lana Isaacson**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 1st day of May 2023.

*Caroline J. Davison*  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNPL63286

My Commission Expires:

January 22, 2027



**KENTUCKY UTILITIES COMPANY  
AND  
LOUISVILLE GAS AND ELECTRIC COMPANY**

**May 4, 2023 Supplemental Response to Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society and Mountain Association's Initial Request for Information Dated February 17, 2023**

**Case No. 2022-00402**

**Question No. 1.129**

**Responding Witness: Lana Isaacson**

Q-1.129. Please refer to Exhibit JB-3.

- a. Please provide underlying workpapers for the PAYS cost-effectiveness screening in native format with formulas intact.
- b. Please explain the basis for including both an inflation rate (2.53%) and a discount rate (6.41%).
- c. Does the analysis consider the potential for wholesale purchase of equipment (e.g., heat pumps) and discounts relative to retail purchase? Please explain.
- d. Are the savings used in the analysis deemed savings, absolute savings, or as-found savings? Please explain.
- e. Does the analysis include coincidental peak load savings? If so, please provide the value(s) assumed for coincidental peak load savings. If not, please explain why not.
- f. Does the analysis account for future avoided costs? If so, please explain all assumptions used to account for future avoided costs. If not, please explain why not.
- g. Does the analysis assume any changes to electric utility or gas utility rates across time? If so, please state the assumed rates used. If not, please explain why not.
- h. Does the analysis make any assumptions related to applicable federal incentives for energy efficiency upgrades? Please explain.

A-1.129.

**Original Response**

- a. See attachment provided in Excel format.

**May 4, 2023 Supplemental Response**

- a. See attached. These two Excel files were not inputs to or used to calculate PAYS cost-effectiveness results; rather, they are data export files from Cadmus's Portfolio Pro Plus cost-benefit software, values from which appear in Tables 3 and 4 of the November 11, 2022 "Pay-As-You-Save Financing Program Cost Effectiveness Analysis" (Exhibit JB-3).

The attachments are  
being provided in  
separate files.