# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In	the	Matter	of:

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	)

JUNE 9, 2023 SUPPLEMENTAL RESPONSE OF
KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE MERCER COUNTY FISCAL COURT'S
SUPPLEMENTAL REQUEST FOR INFORMATION
DATED APRIL 14, 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

> Sammy Ely Notary Public

> Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026

## KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

# June 9, 2023 Supplemental Response to Mercer County Fiscal Court's Supplemental Request for Information Dated April 14, 2023

Case No. 2022-00402

#### **Question No. 3**

Responding Witness: Lonnie E. Bellar

- Q-3. Please reference the Companies' response to Mercer Country Initial Request No. 11. Please list the following regarding the due diligence studies:
  - a. Please provide the studies,
  - b. Provide the entities who performed the studies,
  - c. Provide the fair market value of the solar property purchase referenced in the answer.

### A-3. Original Response

c. The property in question can currently only be obtained by paying a per acre price and a development fee, per terms established by Savion. On April 27, 2023 the Companies' closed on approximately 858 acres at a price of \$9,871,324 with an additional obligation to pay, subject to CPCN approval, an \$8,000,000 development fee to obtain the property. The value of the property as measured by Savions's terms is \$17,871,324 or \$20,820/acre.

#### June 9, 2023 Supplemental Response

c. See the supplemental response to PSC 2-58 parts (a) and (b).

## KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

# June 9, 2023 Supplemental Response to Mercer County Fiscal Court's Supplemental Request for Information Dated April 14, 2023

Case No. 2022-00402

#### **Question No. 4**

Responding Witness: Lonnie E. Bellar

Q-4. Please reference the Companies' response to Mercer County Initial Request No. 19. Will the Companies commit, with the cooperation of Savion, that the remaining acres, whether 416 or otherwise, will be set aside for industrial development? If not, why not?

### A-4. Original Response

At this point in time it would not be in the best interest of the Companies' or their customers to commit to any specific property use, other than for the purposes of solar construction.

### June 9, 2023 Supplemental Response

See the supplemental response to PSC 2-58 parts (a) and (b).

## KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

# June 9, 2023 Supplemental Response to Mercer County Fiscal Court's Supplemental Request for Information Dated April 14, 2023

Case No. 2022-00402

**Question No. 20** 

Responding Witness: Lonnie E. Bellar

Q-20. With respect to the Companies' response to Mercer County's Initial Request No. 24, when do the options on the property expire? Please explain in detail the ramifications for the Companies if the options expire.

### A-20. Original Response

The proposed Mercer Solar project is fully contained within Purchase Option 1, which has been fully executed by Savion. There is no risk to the Companies associated with the expiration of Options 2 & 3.

- Purchase Option 1 Approximately 1,316 acres Option was executed by Savion on January 27, 2023 with an effected date of January 30, 2023.
- Purchase Option 2 Approximately 406 acres October 15, 2023
- Purchase Option 3 Approximately 142 acres February 20, 2024

### June 9, 2023 Supplemental Response

See the supplemental response to PSC 2-58 parts (a) and (b).