

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 AND SITE COMPATIBILITY )  
CERTIFICATES AND APPROVAL OF A )  
DEMAND SIDE MANAGEMENT PLAN )

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**LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT AND  
LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT'S  
JOINT THIRD REQUEST FOR INFORMATION TO THE JOINT APPLICANTS**

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In accordance with the Public Service Commission's ("Commission") January 6, 2023, Order, Intervenor Lexington-Fayette Urban County Government ("LFUCG") and Louisville/Jefferson County Metro Government ("Louisville Metro") propound the following data requests upon the Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E")(collectively, "Joint Applicants" or "Companies"). The Joint Applicants shall respond to these requests in accordance with the provisions of the Commission's May 16, 2023, Order, applicable regulations, and the instructions set forth below.

**INSTRUCTIONS**

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate LFUCG and Louisville Metro's request and also identify the witness(es) responsible for supplying the information.

3. If any request appears confusing, please request clarification directly from counsel for LFUCG and Louisville Metro.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If the Joint Applicants object to any request on any grounds, please notify counsel for LFUCG and Louisville Metro as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

10. These requests shall be deemed continuing so as to require supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Respectfully submitted,



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**CASE NO. 2022-00402**  
**LFUCG AND LOUISVILLE METRO'S**  
**JOINT SUPPLEMENTAL REQUEST FOR INFORMATION TO JOINT APPLICANTS**

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.

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.