

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILINGS OF LOUISVILLE	)	
GAS AND ELECTRIC COMPANY AND	)	
KENTUCKY UTILITIES COMPANY TO REVISE	)	
PURCHASE RATES FOR SMALL CAPACITY AND	)	CASE NO.
LARGE CAPACITY COGENERATION AND	)	2023-00404
POWER PRODUCTION QUALIFYING FACILITIES	)	
AND NET METERING SERVICE-2 CREDIT	)	
RATES	)	

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.  
SUPPLEMENTAL REQUESTS FOR INFORMATION TO  
LOUISVILLE GAS AND ELECTRIC COMPANY  
AND KENTUCKY UTILITIES COMPANY**

Come now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and in accordance with the Public Service Commission’s Order dated December 13, 2023, submits its Supplemental Requests for Information to Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company (KU collectively “Companies”).

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to the Companies’ response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the Companies’ witness who will be prepared to answer questions concerning the request during an evidentiary hearing.
- 3) These requests shall be deemed continuing so as to require further and supplemental responses if the Companies receives or generates additional

information within the scope of these request between the time of the response and the time of any evidentiary hearing held by the Commission.

- 4) If any request appears confusing, please request clarification directly from Counsel for KYSEIA.
- 5) To the extent that the specific document, workpaper, or information as requested does not exist, 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 Companies have any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for KYSEIA as soon as possible.
- 8) For any document withheld on the basis of privilege, state the following: Date; author; addressee; indicated or blind copies; all person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that any document called for has been destroyed or transferred beyond the control of the Companies, state: 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 policy.

10)As the Companies discover errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document to support any changes.

WHEREFORE, KYSEIA respectfully submits its Supplemental Requests for Information to LG&E and KU.

Respectfully submitted,

/s/ David E. Spenard

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### **Notice And Certification For Filing**

Undersigned counsel provides notice that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 8<sup>th</sup> day of February 2024, in conformity with the Commission's April 14, 2023 Order of procedure in the instant case. Pursuant to the Commission's Orders in Case No. 2020-00085, *Electronic Emergency Docket Related to Novel Coronavirus Covid-19*, the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

### **Notice And Certification Concerning Service**

No party has been excused from the electronic filing procedures in the instant proceeding.

/s/ David E. Spenard

David E. Spenard

**KENTUCKY SOLAR INDUSTRIES ASSOCIATION, INC.  
SUPPLEMENTAL REQUESTS FOR INFORMATION TO  
LOUISVILLE GAS AND ELECTRIC COMPANY AND  
KENTUCKY UTILITIES COMPANY**

1. In reference to responses KYSEIA A-2 a. which states “the ‘decremental cost of energy’ would be the cost to ramp down that unit to 299 MW” and A-2 c. which states “Therefore, decremental cost of energy, or the cost of ramping units down 1 MW at a time, is the appropriate measure.” please provide the following:
  - a. A list of the individual cost components the Companies included in determining the cost of ramping down a generating unit; and
  - b. An explanation of the differences between the “decremental cost of energy” as used by the Companies and the definition of “avoided costs” in 18 CFR 292.101(b)(6).
  
2. The Companies’ response in KYSEIA A-13 b. stated that “Yes, generating units supporting the Companies’ off-system sales are also used to provide electricity for native load.” The Companies’ response to A-13 a. referenced “the response to PSC 1-2.” In which the Companies’ stated “When this [OSS] option is activated, the model meets native load obligations and sells incremental energy when economic, i.e., when the generation cost is below the market price of energy net of the additional costs to make the sale.” In regard to off-system sales, please answer the following:
  - a. In what ways are the fixed costs of generating units dispatched to supply off-system sales factored into the economic decision to make off-system sales?
  - b. In the Companies’ last rate case, what percentage of fixed costs of generating units used to serve off-system sales were assigned to on-system customers and what percentage were assigned to off-system sales?
  - c. Do off-system sales financially benefit on-system customers? If so, please explain how.
  
3. In reference to spreadsheet files labeled LGE KU Attachment to KYSEIA DR-1 Q01 - Att 1, LGE KU Attachment to KYSEIA DR-1 Q01 - Att 2, and LGE KU Attachment to KYSEIA DR-1 Q01 - Att 3, please provide the following:
  - a. A description of what data are shown in each column; and
  - b. The energy price for each forecast hour as calculated in accordance with the example provided in LGE KU Attachment to AG DR-1 - Q03(a).
  
4. Including the Purchase Power Agreement (PPA) with Rhudes Creek Solar, LLC (November 21, 2019), supply a copy of each solar PPA in which LG&E and/or KU (collectively or separately) have been a signatory since November 1, 2019.

5. For each solar PPA (since November 1, 2019) in which LG&E and/or KU (collectively or separately) have been a signatory, by PPA, state the solar energy payment rate in MWh.