

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.
INITIAL 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 Initial 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 Initial 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 11th day of January 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.
INITIAL REQUESTS FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY**

1. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, please provide the data used to calculate the values presented in Table 1: QF Generation Technologies in spreadsheet format with all formulae intact.
2. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, page 4, please provide the following:
 - a. An explanation of the intended meaning of the word “decremental”;
 - b. The reference upon which the intended meaning of the word “decremental” is based; and
 - c. A justification for the use of the word “decremental” in the context of calculating the avoided cost.
3. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, please provide the data and calculations used to calculate the values presented in Table 2: Annual Avoided Energy Cost (\$/MWh) in spreadsheet format with all formulae intact.
4. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, Table 2: Annual Avoided Energy Cost (\$/MWh), please provide the following:
 - a. An explanation of why 20 years of future prices were used to calculate the avoided energy cost for a contract with a 7-year term, as described in footnote 9 (page 5).
 - b. An explanation of what costs the utility avoids in years 8-20 during the 7-year term referenced in footnote 9 (page 5).
 - c. All the underlying data and the data sources used to determine the 20-year forecasted values for each technology.
 - d. The basis for, justification of, and sources supporting the use of a 6.55% discount rate as indicated in footnote 8 (page 5) to compute the levelized cost of energy.
5. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, please provide the data and calculations used to calculate the values presented in Table 3: Avoided Energy Costs (\$/MWh) in spreadsheet format with all formulae intact.
6. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, please provide the data and

calculations used to calculate the values presented in Table 4: Seasonal Capacity Need (MW) in spreadsheet format with all formulae intact.

7. The Commission's September 24, 2021 Order in Case Nos. 2020-00349 and 2020-00350, page 35, found "that LG&E/KU should implement an ELCC method for valuing resource's capacity contribution." In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, Table 7: Availability of QF Resources during Peak Hours (% of Nameplate Capacity) and associated test, please provide the following:
 - a. Documentation describing the assumptions and methodology used in LG&E/KU's ELCC method; and
 - b. Documentation of the results of LG&E/KU's ELCC analysis.
8. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, page 6, please provide all supporting information for the statement that reads "Table 4 summarizes the Companies' seasonal capacity need in each scenario as well as the average seasonal capacity need based on 17% summer and 24% winter reserve margins."
9. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, please provide all supporting information for the data in Table 22 and Table 23 in Appendix A, including the underlying methods, how those methods were selected, and details regarding the choice of method.
10. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, please provide the data and calculations used to calculate the values presented in Table 5: CT Capital and Fixed Operating Costs in spreadsheet format with all formulae intact.
11. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, page 8, footnote 11, please provide the specific reference in the National Renewable Energy Laboratory's 2023 Annual Technology Baseline, including the source file URL, worksheet name in the source file, and cell reference and supporting information for use of the "2%" rate.
12. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, page 8, regarding the use of the National Renewable Energy Laboratory's (NREL's) 2023 Annual Technology Baseline (ATB), please provide the following:
 - a. Justification for the decision to exclude the interconnection cost provided in NREL's ATB;
 - b. Justification for the decision to exclude the construction financing cost provided in NREL's ATB; and

- c. Justification for the decision to exclude the land acquisition cost provided in NREL's ATB.
- 13. In reference to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, page 3, regarding the statement "To focus the analysis on the cost of serving native load, off-system sales were not permitted in PROSYM.", please:
 - a. Provide the quantity of off-system sales excluded from the PROSYM modeling; and
 - b. Explain whether the generating units supporting these off-system sales are also used to provide electricity for native load.
- 14. In reference to the Generation Forecast Process Generation Planning and Analysis 2023, pages 5-7, attached to 2024-2025 Qualifying Facilities Rates & Net Metering Service-2 Bill Credit Generation Planning & Analysis October 2023, please provide documentation in spreadsheet format with all formulae intact showing the price forecasts for each fuel type and use of the fuel cost multiplier.