

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)	CASE NO. 2023-00404
CAPACITY AND LARGE CAPACITY)	
COGENERATION AND POWER PRODUCTION)	
QUALIFYING FACILITIES AND NET)	
METERING SERVICE-2 CREDIT RATES)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
AND
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
DATED FEBRUARY 7, 2024

FILED: February 22, 2024

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Stuart A. Wilson**, being duly sworn, deposes and says that he is Director, Energy Planning, Analysis & Forecasting for Kentucky Utilities Company and Louisville Gas and Electric 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.



Stuart A. Wilson

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of February 2024.

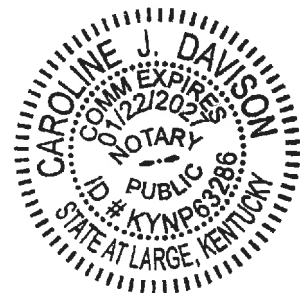


Notary Public

Notary Public ID No. KYNPL63286

My Commission Expires:

January 22, 2027



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

**Response to Commission Staff's Second Request for Information
Dated February 7, 2024**

Case No. 2023-00404

Question No. 1

Responding Witness: Stuart A. Wilson

- Q-1. Refer to LG&E/KU's response to Commission Staff's First Request for Information (Staff's First Request), Item 1. Provide the supporting calculation and workpapers in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.
- A-1. See attachment being provided in a separate file for all workpapers updated in order to respond to PSC 1-1 (i.e., workpapers not provided here are unchanged and already provided in response to JI 1-3). Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

The attachments are
being provided in
separate files.

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

**Response to Commission Staff's Second Request for Information
Dated February 7, 2024**

Case No. 2023-00404

Question No. 2

Responding Witness: Michael E. Hornung / Stuart A. Wilson

- Q-2. Refer to LG&E/KU's response to Staff's First Request, Item 4
- a. Explain how many, if any, Qualified Facilities (QF) customers LG&E/KU currently have. If possible, include in the response the names and locations of the facilities.
 - b. Explain if the QF's operate at low-capacity factors similar to a combustion turbine (CT). Include in the response how many QF's operate as such and the MW capacity each QF provides.
 - c. During the 2-year period of procurement and construction of Mill Creek 5, explain why utilizing the cost of the Mill Creek 5 natural gas combustion turbine (NGCC) for avoided capacity costs would not be appropriate considering LG&E/KU have a 2-year avoided capacity cost of \$0.00 per MWh. Include in the response an explanation of how LG&E/KU would not be able to avoid a portion of the Mill Creek 5 NGCC.
- A-2.
- a. See attachment being provided in a separate file for parts a and b of this request. The Companies are unaware of the names of the QF facilities, but their locations are provided in the attachment. See also the Companies' response to JI 1-2.
 - b. See the response to a. Because all the Companies' QF customers are structured "As Available" with generation behind the meter, the Companies do not have or maintain the data to calculate capacity factors for these facilities. The Companies know only the amount of energy supplied to the grid as provided in response to JI 1-2(a) and do not know the amount of energy generated by the QF that was consumed by the customer.
 - c. The Companies have substantively concluded negotiations on an agreement with the best evaluated bidder for Mill Creek 5. The net output for Mill Creek 5 is a fixed term of this agreement, so neither Mill Creek 5's output nor its cost will be impacted by the addition of QFs.

The attachment is being provided in a separate file in Excel format.

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

**Response to Commission Staff's Second Request for Information
Dated February 7, 2024**

Case No. 2023-00404

Question No. 3

Responding Witness: Stuart A. Wilson

- Q-3. Refer to LG&E/KU's response to Staff's First Request, Item 4. Provide the supporting calculation and workpapers in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.
- A-3. See attachment being provided in a separate file. The information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

The entire attachment is
Confidential and
provided separately
under seal.

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

**Response to Commission Staff's Second Request for Information
Dated February 7, 2024**

Case No. 2023-00404

Question No. 4

Responding Witness: Stuart A. Wilson

- Q-4. Refer to LG&E/KU's response to Staff's First Request, Item 5. Provide the supporting calculation and workpapers in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.
- A-4. See attachment being provided in a separate file. Certain information requested is confidential and proprietary and is being provided under seal pursuant to a petition for confidential protection.

The attachment is
being provided in
a separate file in
Excel format.