

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC INVESTIGATION OF )  
LOUISVILLE GAS AND ELECTRIC )  
COMPANY AND KENTUCKY UTILITIES ) CASE NO. 2023-00422  
COMPANY SERVICE RELATED TO WINTER )  
STORM ELLIOTT )

**POST-HEARING DATA REQUESTS OF JOINT INTERVENORS METROPOLITAN  
HOUSING COALITION, KENTUCKIANS FOR THE COMMONWEALTH,  
KENTUCKY SOLAR ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION TO  
LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES  
COMPANY**

Dated: June 14, 2024

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Commonwealth, Kentucky Solar Energy  
Society, and Mountain Association*

## DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. Unless otherwise specified in each individual interrogatory or request, the terms “you,” “your,” “LG&E,” “KU,” “LG&E/KU,” or “Companies” refer collectively to Louisville Gas & Electric Company and Kentucky Utilities Company, including any affiliated companies, predecessors-in-interest, employees, authorized agents, outside consultants or contractors, or other representatives.
11. “LG&E” means Louisville Gas & Electric Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies.

12. “KU” means Kentucky Utilities Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including Pennsylvania Power and Light.

13. “The Companies” means LG&E and KU.

14. “Joint Intervenors” means the Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association.

15. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.

## INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.

2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement, and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.

3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.

5. The answers provided should first restate the question asked and also identify the person(s) supplying the information.

6. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, 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.

7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Movants or the Commission to evaluate the validity of such claims.

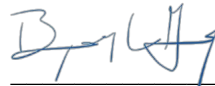
9. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.

10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**POST-HEARING DATA REQUESTS PROPOUNDED TO  
LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES  
COMPANY BY JOINT INTERVENORS**

- 3.1. Please refer to the Companies' response to Staff's Request No. 1-19(b) and Joint Intervenors' cross-examination of the Companies' Witness Bellar, from approximately 12:18 p.m. to 12:21 p.m. State whether the third-party reliability assessment report completed by Texas Gas Transmission referenced in Attachment 2 has been received by the Company. If so, please provide a copy of the report. If not, please explain why not and identify by when you anticipate receiving a copy of the report.
- 3.2. Please refer to Joint Intervenors' cross-examination of the Companies' Witness Bellar, from approximately 11:40am to 11:41am. Please identify and produce any estimate or enumeration of the cost of the on-site compression being planned for Mill Creek 5.

Respectfully submitted,



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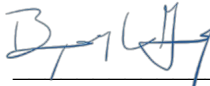
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### **CERTIFICATE OF SERVICE**

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, this is to certify that the electronic filing was submitted to the Commission on June 14, 2024; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.

  
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Byron L. Gary