

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

**In the Matter of:**

**ELECTRONIC INVESTIGATION OF LOUISVILLE  
GAS AND ELECTRIC COMPANY AND KENTUCKY  
UTILITIES COMPANY SERVICE RELATED TO  
WINTER STORM ELLIOTT** )  
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 ) **Case No. 2023-00422**  
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**SIERRA CLUB’S SUPPLEMENTAL REQUESTS FOR INFORMATION  
TO LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES  
COMPANY**

Sierra Club submits these Supplemental Requests for Information (“RFI”) to Louisville Gas and Electric Company and Kentucky Utilities Company (“LG&E/KU” or the “Companies”) in the above-captioned proceeding pursuant to the Commission’s December 22, 2023 Order. Pursuant to that Order, the Companies shall respond to these requests for information no later than February 16, 2024. Please produce the requested information in electronic format whenever possible, and to the following recipients:

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## **DEFINITIONS**

Unless otherwise specified in each individual interrogatory or request, “you,” “your,” the “Companies,” or “LG&E/KU,” refers to Louisville Gas and Electric Company, Kentucky Utilities Company, and their affiliates, directors, officers, employees, consultants, attorneys, and authorized agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all, each and every example of the requested information.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Control” means, without limitation, that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody or subject to your control, identify the person with possession, custody, or control. If any document was in your possession or custody or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, and originals either (1) in the possession, custody or control of the Companies regardless of where located, or (2) produced or generated by, known to or seen by

the Companies, but now not in their possession, custody or control, regardless of where located or whether still in existence. Such “documents” shall include, but are not limited to, applications, permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agendas, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications, and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made. For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original.

“Identify” means:

- a. With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) vis-à-vis the Companies;
- b. With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, to state its date, to state its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical, or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

“Person” means, without limitation, every natural person, corporate entity, partnership, association (formal or otherwise), joint venture, unit operation, cooperative, municipality, commission, governmental body, or agency.

“Relating to” or “concerning” means and includes pertaining to, referring to, or having as a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

“Workpapers” are defined as original, electronic, machine-readable, unlocked, in native format, and with formulae and links intact.

### **INSTRUCTIONS**

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (within Ky. R. Civ. P. 34.01) of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or custody

or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

6. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

7. If any question appears confusing, please request clarification from the undersigned counsel.

8. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.

9. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparation of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

10. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

11. Wherever the response to a request for information consists of a statement that the requested information is already available to Sierra Club, please provide a detailed citation to the document(s) and/or workpapers that contain the information. The citation shall include the title(s) of the document(s), relevant page number(s), and to the extent possible paragraph number(s) and/or chart(s)/table(s)/figure number(s).

12. In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

13. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.

14. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

15. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.

16. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

17. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.

18. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

19. Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

### **PRIVILEGE**

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 request for

information or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit meaningful evaluation of the validity of the claim. With respect to documents for which a privilege is claimed, 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 likewise enable evaluation of the validity of such claims.

### **REQUESTS FOR INFORMATION**

- 2.1 Refer to LG&E/KU’s response to Sierra Club’s initial request for information 1.33.
  - a. Please describe with specificity how the Companies account for “increasing outage rates” in “units with planned and assumed near-term retirements.”
  - b. Specifically, for what units with planned and assumed near-term retirements are the Companies assuming “increasing outage rates”?
    - i. For each unit, what is the assumed outage rate currently, and how does it change over time?
  - c. How do the Companies account for this assumption in their planning?
  - d. Please provide any and all projections and any and all documents, analyses, and workpapers regarding “increasing outage rates” in “units with planned assumed near-term retirements.”
- 2.2 Refer to LG&E/KU’s response to Sierra Club’s initial request for information 1.36.
  - a. List all current gas supply contracts. For each, provide a link to the contract on the Commission’s website.
  - b. List all current gas transportation contracts. For each, provide a link to the contract on the Commission’s website.
- 2.3 Refer to LG&E/KU’s response to the Attorney General’s initial request for information 1.10.
  - a. For each derate or instance of “MW not available” provided, please state whether the event was weather-related or not weather-related.
  - b. Please describe the nature of the “planned outage” at Clifty Creek that resulted in 198 MW not being available.
- 2.4 Refer to LG&E/KU’s response to the Attorney General’s initial request for information 1.2, attachment. Refer specifically to the deleted graph on page 2 and the new graph provided on page 3. Does LG&E/KU plan to update the state legislature and the public on this new graph and these new findings?

- 2.5 Refer to LG&E/KU’s response to the Attorney General’s initial request for information 1.16 and to LG&E/KU’s response to the Attorney General’s initial request for information 1.2, attachment.
- a. Please refer specifically to page 2 of the attachment in response to AG 1.2, which states, “Cold weather derates unrelated to Texas Gas supply ranged from 64MW to 454MW.” Please refer to the response to AG 1.16, which states, in response to “Confirm whether the Companies still believe that the derates unrelated to Texas Gas supply ranged from 45 MW – 361 MW,” “confirmed.” Which set of figures is accurate?
  - b. In light of the answer to part (a) of this response and in light of the Companies’ response to AG 1.2 (attachment), is the following portion of the Companies’ response to AG 1.16 accurate? That response states, “Regarding the second part of the request, none. If the total derates had been limited solely to those unrelated to the Texas Gas low-pressure issue, the Companies would have had sufficient capacity to meet all customers’ energy demands and meet reserve requirements.” If not, please state the accurate response to AG 1.16.
- 2.6 Do LG&E/KU and the LG&E/KU Balancing Authority share office space?
- 2.7 Refer to LG&E/KU’s response to Commission Staff 1.8. Did any LSE in LG&E/KU’s BA footprint besides LG&E/KU have generation outages? If so, please describe in detail.
- 2.8 Refer to LG&E/KU’s response to Commission Staff 1.10. Did any LSE in LG&E/KU’s BA footprint besides LG&E/KU have generation outages? If so, please describe in detail.
- 2.9 Refer to LG&E/KU’s response to Commission Staff 1.23 and 1.24. LG&E/KU states in response to Commission Staff 1.23, “The Companies’ data do not indicate any statistically significant correlation between unit outages or derates and temperature.” If this is the case, why does “the LG&E/KU BA ha[ve] two operating procedures used during extreme winter weather events,” including a cold weather preparedness plan, as stated in response to Commission Staff 1.24?
- 2.10 Refer to LG&E/KU’s response to Commission Staff 1.27. What are the “key insights” that emerged from the GridEx VII tabletop exercise?
- 2.11 Refer to LG&E/KU’s response to Commission Staff 1.36.
- a. Please state whether the OVEC units experienced any outages or derates in January or February 2023, December 2023, or January 2024, or otherwise in December 2022.
    - i. If so, please identify each such outage or derate by generating unit, date, length, cause, and the size in MW if a derate.
- 2.12 Please see the Companies’ response to Sierra Club 1.3. In quantifying the capacity contribution of generators other than limited-duration resources, have the Companies



- accounted for the impact of correlated outages or derates on those resources? If so, please provide that quantification and related assumptions. If not, why not?
- 2.13 Please refer to LG&E/KU's response to Commission Staff 1.23. and Sierra Club 1.5. In light of those responses, do the Companies consider the term "correlated outages" to include each of the following types of occurrences? For each type of occurrence, please explain why the Companies consider it to be a correlated outage, or why they do not consider it to be a correlated outage.
- i. Multiple units experiencing forced outages or derates concurrently
  - ii. Multiple units experiencing forced outages or derates concurrently due to weather factors other than temperature
  - iii. Multiple units experiencing forced outages or derates concurrently due to gas supply constraints at least partially attributable to low temperatures in gas supply fields causing wellheads to freeze
  - iv. Multiple units experiencing forced outages or derates concurrently due to gas supply or pipeline constraints at least partially due to regionally high demand for gas
  - v. Multiple units experiencing forced outages or derates concurrently due to a reduction in gas pipeline pressure due to compressor station failures or other pipeline equipment failures
  - vi. If the Companies' response to any of subparts i-iv is yes, why did the Companies' answers to questions such as Commission Staff 1.23 and Sierra Club 1.5 only discuss correlations between temperature and generator outages or derates?
- 2.14 Please see the Companies' response to Sierra Club 1.37. Do the Companies assert that the reduction in gas pressure they experienced during Winter Storm Elliott was entirely due to equipment issues at the Texas Gas Transmission Slaughters compressor station, and not in any way due to a gas supply and demand imbalance on the Texas Gas Transmission system? Please explain.
- 2.15 Please see the Companies' statement in response to Sierra Club 1.42.c that "The Companies do not make any weather-related derate assumptions." Are the Companies asserting that assumptions about ambient temperatures during summer and winter peak demand periods are already factored into calculations of resources' capacity contribution? If so, what ambient temperature is assumed when calculating summer capacity ratings? If not, please explain why the Companies do not believe it is necessary to make any weather-related derate assumptions.

Dated: March 1, 2024

*Of counsel* (not licensed in Kentucky)

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Respectfully submitted,

/s/ Joe F. Childers  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Sierra Club submission was served upon all parties of record in this proceeding on March 1, 2024, by first-class U.S. mail, hand delivery, and/or e-mail, as permitted by the presiding officer.

/s/ Joe F. Childers  
JOE F. CHILDERS