

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

In the matter of: :

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

**KENTUCKY COAL ASSOCIATION’S FIRST REQUEST FOR INFORMATION TO
KENTUCKY UTILITY COMPANY AND LOUISVILLE GAS & ELECTRIC COMPANY**

The Kentucky Coal Association (KCA) intervener in this action, respectfully requests the applicant, Kentucky Utilities Company and Louisville Gas and Electric Company (collectively, the “Companies”), to respond to the First Request of Information in accordance with the Order of Procedure entered herein.

Additional Instructions

A. Each request for information shall be accorded a separate answer on a separate piece of paper, and each subpart thereof shall be accorded a separate answer. Each request or subpart thereof shall be specifically admitted or denied, and information inquiries or subparts thereof should not be combined for the purpose of supplying a common answer.

B. Restate the information inquiry immediately preceding each response.

C. Identify the name, title, and business address of each person(s) providing each response and provide the data on which the response was created.

D. In answering these requests, utilize all information and documents that are available to you, including information in the possession of any of your agents, employees or attorneys, or otherwise subject to your custody or control.

E. If you object to any part of a request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

F. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to a request, please explain your claim with sufficient specificity to permit KCA to make a full determination as to whether your claim is valid.

G. In each instance, the request shall be construed so as to require the most inclusive answer or production.

H. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Please label the written material with the number of the request to which it pertains.

Definitions

As used in these Requests for Information, the following terms have the meaning as set forth below:

1. "You" or "your" means the Companies or the witness, as the context requires.
2. "List", "describe", "explain", "specify" or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the Companies or their officers, employees, agents or representatives, have knowledge which is relevant to the answer called for by the request.
3. The terms "document" or "documents" as used herein shall have the same meaning and scope as in Rule 34 of the Kentucky Rules of Civil Procedure and shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or

attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, work papers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these requests, regardless of who has or formerly had custody, possession or control.

4. The terms "identify" and "identity" when used with respect to an entity mean to state its full name and the address of its principal place of business.

5. The term to "state the basis" for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief

that there are good grounds to support such allegation, contention, conclusion, position or answer.

6. The terms "and" and "or" have both conjunctive and disjunctive meanings as necessary to bring within the scope of the request any information or documents that might otherwise be construed to be outside their scope; "all" and "any" mean both "each" and "every".

7. The terms "relates to" or "relating to" mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

8. The term "including" means "including, but not limited to."

FIRST REQUEST FOR INFORMATION OF KCA

1-1. Did LG&E/KU management review and implement the NERC and FERC recommendations for Cold Weather Preparations for Extreme Weather Events issued after their joint inquiry into Winter Storm Uri? If so, when?

1-2. Please provide a summary of LG&E/KU's Cold Weather Preparations for Extreme Weather Events prior to Winter Storm Elliott. If preparations were made, were they consistent with the NERC and FERC recommendations?

1-3. Please provide a table showing the electrical demand and how LG&E/KU serviced the electrical demand and from what generation sources over the December 23 through December 25, 2022 period ("Winter Storm Elliott").

1-4. Please provide a simulation of how the LG&E/KU power supply and its customers would have been impacted during Winter Storm Elliott, assuming the same loss of natural gas supply while operating the fully implemented generation fleet as approved by Case No. 2022-00402.

- a. Please respond assuming no dual fuel capability on new MC5; and
- b. Please respond assuming dual fuel capability on new MC5.

1-5. According to LG&E/KU "during the time of the load shedding event, derates attributable to the inability of Texas Gas to meet contractual delivery obligations ranged from 785MW to 943 MW. Derates unrelated to Texas Gas supply ranged from 45MW to 361MW."¹ Absent these derates, would LG&E/KU have been required to shed load?

¹¹ Case No. 2022-00402 Attachment 1 to Response to AG-1 Question No. 13(l) Page 2 of 9 Bellar

1-6. During Winter Storm Elliott, please provide on an hourly basis the capacity provided by each electrical generating unit with its corresponding nameplate rated capacity and capacity factor.

1-7. Were any load shedding events during Winter Storm Elliott due to the lack of coal supply? If so, please provide in detail when and where this occurred?

1-8. How much power did LG&E/KU purchase during Winter Storm Elliott, from whom, and at what cost/price?

1-9. Please provide detailed operating data for each LG&E/KU electrical generation source during Winter Storm Elliott.

1-10. Please provide all correspondence between LG&E/KU and its reliability coordinator, TVA, and OVEC during Winter Storm Elliott.

1-11. Please explain why OVEC and TVA were unable to supply their planned and/or required capacity during Winter Storm Elliott.

1-12. Please provide all changes made to agreements with OVEC, TVA, and PJM or new agreements after Winter Storm Elliott to ensure non-recurrence of load shedding events.

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1-13. Please provide detailed information as to the composition of the customer outages provided in Bellar Testimony in Case No. 2022-00402 shown below for residential, commercial, and industrial customer categories with a list of each specific customer during Winter Storm Elliott that experienced a service interruption with demand service of 5 MW or greater.

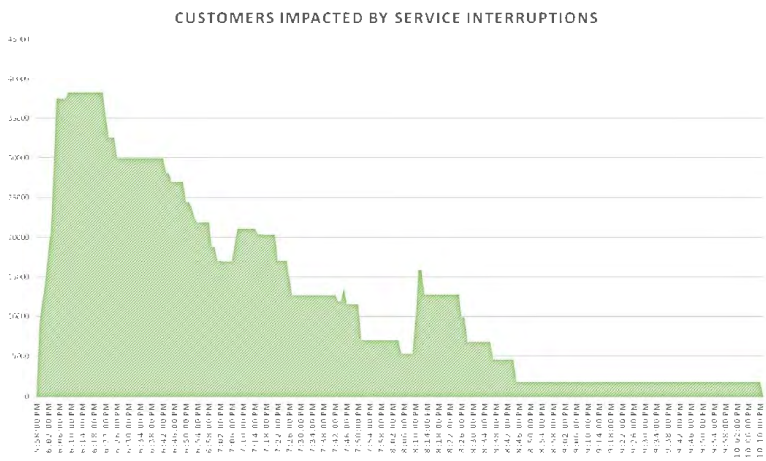
Case No. 2022-00402

Attachment 1 to Response to AG-1 Question No. 13(l)

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**Appendix B:
LG&E/KU Customer Outages**



1-14. Please provide the details of all requests for natural gas purchase and delivery during Winter Storm Elliott with explanation of requests under firm delivery contracts.

1-15. Please provide a listing of all planned and unplanned outages of LG&E/KU generating sources during Winter Storm Elliott including the duration of each outage during Winter Storm Elliott.

1-16. For Winter Storm Elliott, please provide all liquidated damages claims made by LG&E/KU under contracts which LG&E/KU suppliers and service providers failed to meet their obligations.

1-17. For Winter Storm Elliott, please provide all claims for non-performance received by LG&E/KU related to LG&E/KU failing to meet its obligations.

1-18. Which LG&E/KU natural gas generating units impacted by the natural gas pipelines delivery failure have backup fuel oil available?

Respectfully submitted,

/s/Matt Malone

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CERTIFICATE OF SERVICE

I hereby certify that KCA's January 26, 2024 electronic filing is a true and accurate copy of KCA's pleading and Read 1st Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on January 26, 2024; that an original and one copy of the filing will not be delivered to the Commission based on pandemic orders; that there are currently no parties excused from participation by electronic service; and that, on January 26, 2024 electronic mail notification of the electronic filing is provided to all parties of record:

/s/Matt Malone

ATTORNEY FOR KCA