

**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 SUPPLEMENTAL 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 Supplemental 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."

SUPPLEMENTAL REQUEST FOR INFORMATION OF KCA

2-1. Please confirm that low gas delivery pressure is a known exposure related to pipeline gas delivery which is unrelated to Firm Transportation.

2-2. Please confirm the Companies response to KCA First Request for Information Question No. 2 does not address the issue related to low gas delivery pressure. If not confirmed, please explain the connection.

2-3. As it pertains to low gas delivery pressure, please explain whether the Companies considered this risk when Cane Run 7 was built. If not, please explain why not.

2-4. Please confirm the low gas delivery pressure from the TGT (Texas Gas Transmission) pipeline was the cause of significant derates at Cane Run 7 and Trimble County during Winter Storm Elliott. If not, please explain.

2-5. As it pertains to the previous question, please confirm the magnitude of the derates would not have occurred had the Companies developed on-site fuel storage either through dual fuel capability or mini-LNG plants on site at these stations.

2-6. Please indicate whether the drop in pipeline pressure affecting operations at Cane River 7 and Trimble County were considered as potential issues? If not, why not?

2-7. Please explain the Companies' response to the Attorney General's First Request for Information Question No. 8 as to the reasons the Companies have not performed any analysis at or near the gas plants regarding natural gas storage fields.

2-8. Please provide the current status of dual-fuel capability at MC 5 consistent with the Order in Case No. 2022-00402.

2-9. As it pertains to the previous question, please provide the Companies estimates of the capital and operating costs (including fuel) for the dual fuel capability.

2-10. Please indicate whether the Companies considered a mini-LNG plant as an alternative to dual-fuel capability at MC 5. If yes, please provide the status of such consideration.

2-11. Please indicate whether the Companies are also considering adding on-site fuel back-up including mini-LNG plants for Cane Run 7, MC 5, and Trimble County. If yes, please provide the status of this review.

Respectfully submitted,

/s/Matt Malone

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CERTIFICATE OF SERVICE

I hereby certify that KCA's March 1, 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 March 1, 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 March 1, 2024 electronic mail notification of the electronic filing is provided to all parties of record:

/s/Matt Malone

ATTORNEY FOR KCA