

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**ATTORNEY GENERAL’S INITIAL DATA REQUESTS**

The intervenor, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention [“OAG”], hereby submits the following Initial Data Requests to Kentucky Utilities Co. [“KU”], and Louisville Gas & Electric Co. [“LG&E”][hereinafter jointly referenced as “LG&E-KU” or “the Companies”] to be answered by the date specified in the Commission’s Orders of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The OAG can provide counsel for LG&E-KU with an electronic version of these questions in native format, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the Companies receive or generate additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification

of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for OAG.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the Companies have objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify OAG as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or

otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the Companies, state: the identity of the person by whom it was destroyed or

transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound electronic volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations and Orders.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL



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*Certificate of Service*

Pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the parties of record.

This 26<sup>th</sup> day of January, 2024



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Assistant Attorney General

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1. Reference generally the Companies' responses to discovery in Case No. 2022-00402,<sup>1</sup> which has been incorporated by reference into the record of this instant case by virtue of the Commission's December 22, 2023 Order.
  - a. Since the date(s) that the Companies provided their discovery responses, explain whether any additional information, facts, and/or data relevant to this investigation have come to light that would modify the Companies' responses to those prior data requests. If so, provide all such updated responses, together with all such information and data as necessary.
2. In response to AG-DR-1-13 (L) in Case No. 2022-00402, the Companies provided two reports. Explain whether the Companies have made any additions, modifications or updates to these reports. If so, provide marked-up copies together with explanations. Explain also: (i) whether any new reports covering the same subject matters as in the original reports have been prepared, and if so, provide copies; and (ii) whether the Companies have retained any independent contractors / experts to conduct any studies, reports or analyses pertaining to the relevant cold weather outages.
3. Reference the Feb. 2, 2023 LG&E-KU Presentation slides provided to the Kentucky Legislature, incorporated by reference into this docket, at p. 5, which states, "The Companies are working with Texas Gas Transmission to address event and reduce risk of future occurrence." Provide an update on the remedial actions that Texas Gas Transmission, LLC ("Texas Gas") has initiated or undertaken to mitigate the risk of any similar outage from repeating. If Texas Gas has provided any reports or studies to the Companies regarding their remedial actions, please provide copies of same.
4. Reference the Feb. 2, 2023 LG&E-KU Presentation slides provided to the Kentucky Legislature, p. 5, which states, "Companies are reviewing their own winter operating procedures to reduce risk of equipment failure." Explain whether the Companies have initiated any changes to their winter operating procedures, and if so, provide a detailed explanation of all such changes and how each such change is designed to mitigate the risk of a potential recurrence of similar operating issues.
5. Reference the FERC/NERC report incorporated by reference into the docket of the instant case, "Inquiry Into Bulk Power System Operations During December 2022 Winter Storm Elliott" (FERC/NERC Report). Do the Companies agree with

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<sup>1</sup> In Re: *Electronic Joint Application of Kentucky Utilities Company And Louisville Gas And Electric Company For Certificates Of Public Convenience And Necessity And Site Compatibility Certificates And Approval Of A Demand Side Management Plan And Approval Of Fossil Fuel-Fired Generating Unit Retirements.*

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the summary, timing and description of the events depicted therein pertaining to issues incurred in the Companies' system? If not, explain in detail.

6. Do the Companies agree with one of the premises of the FERC/NERC report, that most issues that occurred in the Eastern Interconnect during Winter Storm Elliott (the Storm) can be broken into these categories: mechanical/electrical issues; fuel issues; and freezing issues? <sup>2</sup> If not, explain in detail. If so, how do the Companies breakdown the specific issues their system encountered during the Storm?
7. Provide a discussion regarding whether the Companies generally believe that any of the cold weather mitigation measures that generation owners and LDCs located in northern states undertake could prove useful to the Companies in the future in meeting their reliability requirements.
8. Provide a discussion of whether the Companies have reconsidered adding dual-fuel capability to any of their generating stations (other than the 4 Brown CTs which already have dual-fuel capability). Include in your response whether on-site (or near-site) storage of gas in either gaseous or LNG state can be a cost-effective solution.
  - a. Confirm also that LG&E's gas LDC operation already stores significant quantities of gas in caverns.
  - b. Explain whether the Companies are aware of any caverns at or near their generating stations that might be capable of storing gas.
  - c. Explain how the Companies can access the gas stored in caverns.
  - d. Explain if the gas stored in caverns could have been used during Winer Storm Elliott. If not, explain in detail.
  - e. Explain if the gas in caverns could be accessed in the future to mitigate disruption of pipeline service. If not, explain in detail.
9. Regarding the new natural gas combined cycle (NGCC) unit that the Companies have received permission to construct, explain what measures designers / contractors will undertake to mitigate against cold-weather problems that could affect the unit's operation and performance. Include in your response whether any such measures are required by NERC.
10. Provide an update on the status of the construction of the new NGCC.
11. Provide an update on the status of the design / construction of the SCR for Ghent Unit 2.

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<sup>2</sup> FERC/NERC Report at 91.

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12. Referring to the Response to AG-DR-1-13 (L), attachment 1, pp. 1-2, confirm that the derates at Cane Run 7 were caused exclusively by the drop in pressure referenced in this report. If not confirmed, provide a comprehensive explanation regarding all other causes for the Cane Run 7 derates that have been identified.
13. Referring to the Response to AG-DR-1-13 (L), attachment 1, pp. 1-2, confirm that the derates at the Trimble CTs were caused exclusively by the drop in pressure referenced in this report. If not confirmed, provide a comprehensive explanation regarding all other causes for the Trimble CT derates that have been identified.
14. Provide a discussion regarding how the interruption in energy deliveries from OVEC, and TVA's withdrawals of its energy contributions to the Contingency Reserve Sharing Group affected the Companies' ability to prevent load shedding.
15. Provide a summary of the events which transpired at the Trimble 1 and 2 coal units that contributed to the loss of generating capacity. Provide also a detailed and comprehensive explanation of all measures the Companies have undertaken, and/or are undertaking, to remediate the issues identified and to reduce the risk of such events occurring again.
16. Reference the Response to AG-DR-1-13 (L), attachment 1, p. 2. Confirm whether the Companies still believe that the derates unrelated to Texas Gas supply ranged from 45 MW – 361 MW. Explain how many customers would have experienced rolling outages if the total derates had been limited solely to those unrelated to the Texas Gas supply issue.
17. Explain whether any of the Companies' black start units were affected by the Storm, and if so, provide a comprehensive explanation of all measures the Companies have undertaken to mitigate against the risk of any reoccurrence of these issues.
18. Explain whether as a result of the Final Order issued in the 2022-00402 docket, the revised generation mix resulting therefrom will in any manner affect the Companies' projected reliability indices. If so: (i) explain whether the Companies will have to engage in any additional weather-hardening of any of its supply-side resources; and (ii) provide all data to support the Companies' conclusions.
19. Reference the response to AG-DR-1-23 in the 2022-00402 docket. Explain whether the Final Order's requirement to keep Brown Unit 3 running, and the granting of the CPCN to construct the Brown BESS, will affect any arrangements the Companies have made with EKPC.



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20. Reference the response to AG-DR-1-33 in the 2022-00402 docket. Can the Companies confirm that the addition of all of the solar projects identified therein will not materially improve their wintertime (December-February) reliability indices? Provide a complete explanation.
21. Explain whether the difficulties TVA encountered in supplying contingency reserves during the Storm have caused the Companies to seek any revisions to the document, "PJM, TVA and LG&E/KU Joint Reliability Coordination Agreement" referenced in AG-DR-2-2 in the 2022-00402 docket. If so, provide a description of those changes. Include in your response whether all parties to this agreement have formally entered into / executed the agreement.
22. Were any of the coal piles on site at the Companies' coal-fired generating units inaccessible during the Storm? If so, explain why.
23. How much supply of coal (tons) was on site at each of the Companies' coal-fired generating units during the Storm? Equate the amount of coal available at each plant to the number of days each unit was capable of operating.
24. Provide the operational status for each of the Companies' generating units during the Storm, the fuel source and the production capacity for each hour of the period Dec. 22-25. If a generating unit was not operating for any part of any hour during this period, explain why.
  - a. Explain also whether the Companies made any off-system sales to PJM at any point during the period Dec. 22-25.
25. Per the Commission's order initiating this investigation at p. 2, the Storm affected 54,637 customers. Explain whether all of these customers were affected by rolling black outs due to issues with the Company's generation stations, or whether this total includes any customers who lost power through wires down, trees on wires, transformer issues, or any other causes commonly encountered with storms.
26. Can the companies confirm that no rolling blackouts occurred during January of 2024?