

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

**In the Matter of:**

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

**RESPONSE OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**AND**  
**KENTUCKY UTILITIES COMPANY**  
**TO**  
**THE SIERRA CLUB'S POST-HEARING REQUEST FOR INFORMATION**  
**DATED JUNE 13, 2024**

**FILED: July 8, 2024**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Senior Vice President Engineering and Construction for PPL Services Corporation and he provides services to Louisville Gas and Electric Company and Kentucky Utilities Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

*Lonnie E. Bellar*

**Lonnie E. Bellar**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 3rd day of July 2024.

*Caroline J. Davison*

Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027




VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **David S. Sinclair**, being duly sworn, deposes and says that he is Vice President, Energy Supply and Analysis for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, 220 West Main Street, Louisville, KY 40202, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.

  
\_\_\_\_\_  
**David S. Sinclair**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 3rd day of July 2024.

  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



**LOUISVILLE GAS AND ELECTRIC COMPANY  
AND  
KENTUCKY UTILITIES COMPANY**

**Response to Sierra Club's Post-Hearing Request for Information  
Dated June 13, 2024**

**Case No. 2023-00422**

**Question No. 3.1**

**Responding Witness: Lonnie E. Bellar**

- Q-3.1. Refer to the Companies' response to PSC Data Request 1-36 and Sierra Club's crossexamination of KU/LG&E witness Lonnie E. Bellar about this Data Request between 1:17:15 and 1:22:19 on May 23, 2024. For each of the five referenced OVEC units (Clifty Creek 1, 3, and 6 and Kyger Creek 3 and 4), please:
- a. Provide the generating capacity in MW for each of these units.
  - b. Identify how much capacity in MW was unavailable as a result of these units being offline during Winter Storm Elliott. Specifically, please identify which units were offline during Winter Storm Elliott, for how long, and for what reason(s).
- A-3.1.
- a. Each of the Clifty Creek units has a net winter capacity of 200 MW and each of the Kyger Creek units has a net winter capacity of 199 MW. The Companies own 8.13 percent of the units.
  - b. The Companies' ownership share unavailable from these units being offline was 81 MW. As stated in the response to PSC 1-36, Clifty Creek 1, 3, and 6 and Kyger Creek 3 and 4 were offline during Winter Storm Elliott. The reasons for the outages and the return dates are listed in that response.

**LOUISVILLE GAS AND ELECTRIC COMPANY  
AND  
KENTUCKY UTILITIES COMPANY**

**Response to Sierra Club's Post-Hearing Request for Information  
Dated June 13, 2024**

**Case No. 2023-00422**

**Question No. 3.2**

**Responding Witness: David S. Sinclair**

- Q-3.2. Refer to the Companies' response to Sierra Club Data Request 1.14 and Sierra Club's cross-examination of KU/LG&E witness David S. Sinclair at approximately 7:11:40.
- a. Please identify with specificity what the blue line on each graph includes. For instance, does the blue line on each graph include all forced outages?
  - b. Please provide the back-up file that Mr. Sinclair references in his live testimony.
- A-3.2.
- a. The data points for the blue line are, for each year, the total number of MWh lost due to all forced outage and forced derating events in that year, divided by the number of days in that year.
  - b. The file referenced in Mr. Sinclair's live testimony is the attachment to SC 1-1.14. The MWh totals in that file originate from Case No. 2022-00402, attachment to SC-PH-1 4.1(a) and 4.1(b).