

**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 ATTORNEY GENERAL'S SUPPLEMENTAL DATA REQUESTS**

**DATED MARCH 1, 2024**

**FILED: March 15, 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 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**

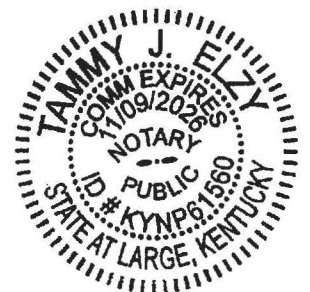
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 13<sup>th</sup> day of March 2024.

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

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



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

**Response to Attorney General's Supplemental Data Requests  
Dated March 1, 2024**

**Case No. 2023-00422**

**Question No. 1**

**Responding Witness: Lonnie E. Bellar**

- Q-1. Reference the response to AG-DR-1-10. Explain whether the Companies have signed the referenced agreement pertaining to the construction of Mill Creek-5.
- A-1. The Companies signed the Mill Creek 5 construction contract with GE Vernova Operations LLC and The Industrial Company ("TIC") – a Kiewit Energy Group Inc. affiliate on February 29, 2024.

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

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**Case No. 2023-00422**

**Question No. 2**

**Responding Witness: Lonnie E. Bellar**

- Q-2. Reference the response to AG-DR-1-11. If the Companies do not construct an SCR for Ghent Unit no. 2, explain how they will not be in violation of the Commission's Order dated Nov. 6, 2023 in Case No. 2022-00402, which stated, in part: ". . . 3. LG&E/KU's request to retire Ghent 2 and Brown 3 is denied."
- A-2. To be clear, the Companies' response to AG 1-11 did not state that the Companies would not seek to construct an SCR for Ghent Unit 2; rather, it stated, "The Companies do not currently have plans to construct an SCR for Ghent 2 but will continue to evaluate options for Ghent 2's compliance with potential environmental regulations including constructing an SCR, seasonal operation, or retirement." Therefore, it is possible that the Companies could seek to construct an SCR for Ghent Unit 2.

As stated in the cited response, the Companies could also keep Ghent Unit 2 in operation without constructing an SCR by operating the unit only in the non-ozone season.

Finally, the cited Order does not state that the Companies must operate Ghent Unit 2 in perpetuity. Presumably there could be future circumstances in which the Commission would approve the retirement. Thus, it is unclear how not currently planning to add an SCR to Ghent Unit 2 in any way violates the cited Order.

**LOUISVILLE GAS AND ELECTRIC COMPANY  
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**Case No. 2023-00422**

**Question No. 3**

**Responding Witness: Lonnie E. Bellar**

Q-3. Have the Companies ever held out to the Commission or the public at large that their generating stations would never incur any weather-related outages? If so, provide details.

A-3. No.

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**Question No. 4**

**Responding Witness: Lonnie E. Bellar**

- Q-4. Explain whether the Companies are aware of any type of generation source that has never experienced any type of equipment breakdown or other outage. If so, please identify all such sources.
- A-4. The Companies are not aware of such generation sources.