### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

#### In the Matter of:

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

# RESPONSE OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY TO

THE JOINT INTERVENORS OF METROPOLITAN HOUSING COALITION, KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION'S POSTHEARING DATA REQUESTS

**DATED JUNE 14, 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

Notary Public

Notary Public ID No. KYNP 63286

My Commission Expires:

#### VERIFICATION

COMMONWEALTH OF KENTUCKY	
COUNTY OF JEFFERSON	,

The undersigned, **Charles R. Schram**, being duly sworn, deposes and says that he is Director – Power Supply for 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.

Charles R. Schram

Notary Public

Notary Public ID No. KYNP 63286

My Commission Expires:

Jamany 22, 2027



## LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

Response to Joint Intervenors of Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association's Post-Hearing Data Requests Dated June 14, 2024

Case No. 2023-00422

Question No. 3.1

Responding Witness: Lonnie E. Bellar / Charles R. Schram

- Q-3.1. Please refer to the Companies' response to Staff's Request No. 1-19(b) and Joint Intervenors' cross-examination of the Companies' Witness Bellar, from approximately 12:18 p.m. to 12:21 p.m. State whether the third-party reliability assessment report completed by Texas Gas Transmission referenced in Attachment 2 has been received by the Company. If so, please provide a copy of the report. If not, please explain why not and identify by when you anticipate receiving a copy of the report.
- A-3.1. No, the Companies have not received the referenced report and the Companies do not anticipate receiving it. Texas Gas Transmission ("TGT") has indicated that the report contains significant content beyond weather preparation information that is proprietary to TGT and that will not be provided outside of TGT. Having said that, the Companies note that information concerning the weather preparation upgrades TGT made as a result of the storm event to better serve the Companies has been provided in the record of this case. See the response to PSC 1-19.

## LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

Response to Joint Intervenors of Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association's Post-Hearing Data Requests Dated June 14, 2024

Case No. 2023-00422

Question No. 3.2

Responding Witness: Lonnie E. Bellar

- Q-3.2. Please refer to Joint Intervenors' cross-examination of the Companies' Witness Bellar, from approximately 11:40am to 11:41am. Please identify and produce any estimate or enumeration of the cost of the on-site compression being planned for Mill Creek 5.
- A-3.2. The Companies' EPC contractor has indicated that onsite compression is approximately \$7 million of the overall EPC contract cost for Mill Creek 5.