

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
FOR A SITE COMPATIBILITY CERTIFICATE)	
FOR THE CONSTRUCTION OF A BATTERY)	CASE NO. 2024-00082
ENERGY STORAGE SYSTEM FACILITY AT)	
E.W. BROWN GENERATING STATION IN)	
MERCER COUNTY, KENTUCKY)	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
THE COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
DATED JUNE 6, 2024

FILED: June 21, 2024

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Philip A. Imber**, being duly sworn, deposes and says that he is Director – Environmental Compliance 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.



Philip A. Imber

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 19th day of June 2024 .



Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

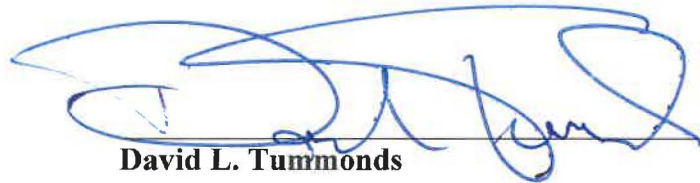
January 22, 2027



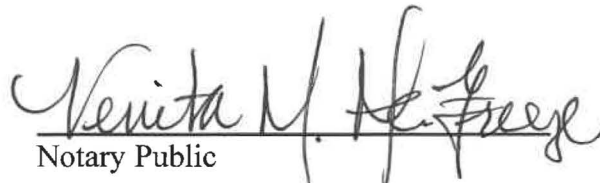
VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **David L. Tummonds**, being duly sworn, deposes and says that he is Senior Director Project Engineering 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.


David L. Tummonds

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 19th day of June 2024.


Notary Public
Notary Public, ID No. KYNP4577

My Commission Expires:

April 1, 2028



LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Commission Staff's Second Request for Information
Dated June 6, 2024**

Case No. 2024-00082

Question No. 1

Responding Witness: David L. Tummonds

- Q-1. Refer to LG&E's response to Commission Staff's First Request for Information (Staff's First Request), Item 47, Attachment, page 22, 7.1.1 Possible Karst Areas. Given the results and recommendations in the Geotechnical Report, provide how LG&E will mitigate potential karst hazards which as the report states, can cause "catastrophic failures beneath buildings and structures".
- A-1. The Company will follow the recommendations provided in the Geotechnical Report. Per page 22, section 7.1.1 of the referenced Geotechnical Report, the Company will perform additional soil borings/rock soundings as well as geophysical exploration to identify the presence of karst features. If karst features are identified, they will be mitigated during design or during initial earthwork activities. Mitigation measures can include, but are not limited to, deep foundations and/or exposing the karst feature and backfilling with an engineered fill or lean concrete. The Company will work with the engineer of record to determine the mitigation measure on a case-by-case basis; however, the Company has a successful history of implementing complex and critical projects at E.W. Brown using the mitigation techniques provided above. The risk of a catastrophic failure is eliminated upon identification and mitigation of underlying karst features.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Commission Staff's Second Request for Information
Dated June 6, 2024**

Case No. 2024-00082

Question No. 2

Responding Witness: David L. Tummonds

- Q-2. Refer to LG&E's response to Staff's First Request, Item 2. Explain where in the bidding process the Engineering, Procurement, and Construction (EPC) selection is.
- A-2. The Company is currently working with our Owners Engineer ("OE") to issue a request for quotation ("RFQ") for the battery technology, which is approximately 75% of the overall cost of the project. Upon selection of the battery technology, the Company will negotiate an open book fixed and firm EPC agreement with our OE. The Company evaluated multiple EPC contracting structures and determined that the open book, fixed and firm approach was the best structure for this project. Factors that lead to this decision include, but are not limited to: The majority of the cost for the project is associated with the battery technology, which will be competitively bid; EPC bidders are being selective on projects/companies they will bid as it's a sellers' market. In some cases, contractors are being paid to bid projects; and the Company's OE (Burns & McDonnell) is a top tier renewable contractor familiar with our design requirements and expectations. By utilizing the open book, fixed and firm approach, the Company ensures that a top tier EPC contractor will design and build our first utility scale BESS. It is anticipated that the EPC agreement will be executed during the 4th quarter of 2024.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Commission Staff's Second Request for Information
Dated June 6, 2024**

Case No. 2024-00082

Question No. 3

Responding Witness: Philip A. Imber / David L. Tummonds

- Q-3. Refer to LG&E's response to Staff's First Request, Item 4. Identify and provide any of Mercer County's planning and zoning requirements that would be applicable to LG&E's proposed facility if LG&E was not exempt from all planning and zoning requirements pursuant to KRS 100.324 (i.e. requirements that would apply based on the nature of the facility without regard to an exception based on ownership by a utility).
- A-3. Mercer County has not adopted any setback requirements applicable to battery projects. As a result, there would be no applicable planning and zoning requirements even if LG&E was not exempt.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Commission Staff's Second Request for Information
Dated June 6, 2024**

Case No. 2024-00082

Question No. 4

Responding Witness: David L. Tummonds

- Q-4. Refer to LG&E's response to Staff's First Request, Item 7. State whether LG&E has had any contact with the city of Burgin, Kentucky regarding this project.
- A-4. LG&E has not had any direct contact with the city of Burgin regarding the Brown BESS project at this time: however, the community has been made aware of the Brown BESS through the Neighbor to Neighbor newsletter. See the response to PSC 1-41. LG&E will make sure the city of Burgin is briefed on this project once the EPC agreement, noted in response to Question No. 2, has been reached and EPC contractor has been selected.