

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

In the Matter of:

ELECTRONIC 2024 JOINT INTEGRATED)	
RESOURCE PLAN OF KENTUCKY UTILITIES)	
COMPANY AND LOUISVILLE GAS AND)	CASE NO. 2024-00326
ELECTRIC COMPANY)	

**POST-HEARING REQUESTS FOR INFORMATION OF KENTUCKIANS
FOR THE COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY,
METROPOLITAN HOUSING COALITION, AND MOUNTAIN
ASSOCIATION TO LOUISVILLE GAS & ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY**

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Dated: May 19, 2025

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.

10. “You” or “your” means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “Companies”, “Louisville Gas & Electric Company and Kentucky Utilities Company”, or “LG&E-KU ”, means Louisville Gas & Electric Company and Kentucky Utilities Company, their parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
12. “Joint Intervenors” means Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Metropolitan Housing Coalition, and Mountain Association who have been granted the status of full intervention as joint intervenors in this matter.
13. Unless otherwise specified in each individual request the term “tariff” means the tariff as filed in this matter by LG&E-KU .
14. “AMI” means advanced metering infrastructure.
15. “BYOD” means bring your own device.
16. “CCR” means coal combustion residuals.
17. “CCRMU” means CCR management unit.
18. “Updated CCR rule” means the final EPA “Hazardous and Solid Waste Management System: Disposal of Coal Combustion Residuals From Electric Utilities; Legacy CCR Surface Impoundments” rule published in the Federal Register May 08, 2024.
19. “CPCN” means certificate of public convenience and necessity.
20. “DER” means distributed energy resource.
21. “DR” means demand response.

- 22. “DSM” means demand side management.
- 23. “EE” means energy efficiency.
- 24. “EIR” means the Energy Infrastructure Reinvestment Program created by the IRA.
- 25. “EPIC” means the Energy Planning and Inventory Commission.
- 26. “EV” means electric vehicle.
- 27. “IRA” means the Inflation Reduction Act of 2022.
- 28. “IRP” means integrated resource plan.
- 29. “LPO” means the U.S. Department of Energy’s Loan Programs Office.
- 30. “PURPA” means the Public Utility Regulatory Policies Act of 1978.
- 31. “QF” means qualifying facility under PURPA.
- 32. “RFP” means request for proposals.
- 33. “UPC” means use-per-customer.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a “privilege log” that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.
9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

POST-HEARING DATA REQUESTS PROPOUNDED TO
LOUISVILLE GAS & ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY BY JOINT
INTERVENORS

Joint Intervenors hereby tender the following post-hearing requests for information to the Companies:

- 3.1. Please refer to the Joint Intervenors' cross-examination of the Companies' Witness Bellar, from approximately 11:45 a.m. to 11:48 a.m. on Tuesday May 13, 2025. Please produce the most recent evaluation of the feasibility of expanding capacity of the "Ohio Falls" hydroelectric facility.
- 3.2. Please refer to the Joint Intervenors' cross-examination of the Companies' Witness Jones, from approximately 4:55 p.m. to 4:57 p.m. on Tuesday May 13, 2025. Please provide the forecast by rate class used to develop the Companies' power service rate.
- 3.3. Please refer to the Joint Intervenors' cross-examination of the Companies' Witness Sebourn, from approximately 9:21 a.m. to 9:24 a.m. on Wednesday May 14, 2025. Please explain how battery storage technology has improved since 2018 and how that is reflected in the Companies' modeling to accurately characterize battery storage technology.
- 3.4. Please refer to the Joint Intervenors' cross-examination of the Companies' Witness McFarland, from approximately 11:46 a.m. to 11:51 a.m. on Wednesday May 14, 2025; the table listing interconnections with neighboring transmission systems at page 3 of the "Transmission Section" of the Companies' 2024 IRP, Vol. III; and Table 6-1 at page 150 of East Kentucky Power Cooperative's 2025 Integrated Resource Plan, Case No. 2025-00085 (pdf 168 of 244).
 - a. In the Companies' view, does Table 6-1 of EKPC's 2025 IRP accurately identify each of the "delivery points" or "free-flowing connections" between the transmission systems of EKPC and the Companies? If not, please specify changes necessary to correct each inaccuracy.
 - b. In the Companies' view, does Table 6-1 of EKPC's 2025 IRP accurately characterize the voltage and ratings in MVA for each of the "delivery points" or "free-flowing connections" between the transmission systems of EKPC and the Companies? If not, please specify changes necessary to correct each inaccuracy.
 - c. For each LG&E/KU transmission system interconnection with a neighboring transmission system other than EKPC, please provide the voltage (kV) and ratings in MVA for normal and emergency conditions in both the summer and winter.
- 3.5. Please refer to the Joint Intervenors' cross-examination of the Companies' Witness McFarland, from approximately 12:01 p.m. to 12:05 p.m. on Wednesday May 14, 2025. Does the Generator Interconnection Queue posted on the

Companies' OASIS provide a complete historical record of previously submitted Generator Interconnection requests? If not, please explain the circumstances under which a once-queued generation interconnection request would be removed from the posted GIA Queue.

- 3.6. Please refer to the Joint Intervenors' cross-examination of the Companies' Witness Imber, beginning at approximately 2:02 p.m. to 2:05 p.m. on Wednesday May 14, 2025 and Joint Intervenor's supplemental request 19(c). Please provide the requested data on an hourly basis for the timeframe maintained by the Companies.
- 3.7. Please refer to the Joint Intervenors' cross-examination of the Companies' Witness Montgomery, beginning at approximately 3:05 p.m. to 3:08 p.m. on Wednesday May 14, 2025. With regard to the attachment provided in response to Joint Intervenor's supplemental data request number 36 ("02-JI_DR2_LGE_KU_Supplemental_Attach_to_Q36(a,b)_-Past_Due_Amt_REVISED.xlsx"), please:
 - a. Explain how the "Average Number Of Customers (a)" for each year was calculated;
 - b. Explain how the "Average Past Due Balance (b)" for each year was calculated; and
 - c. Please also refer to the Companies' response to Joint Intervenor's initial data request number 55, and for each of the most recent three years available:
 - i. The monthly number of customers with a past due balance by zip code or census tract; and
 - ii. The monthly past due balance amount by zip code or census tract.

[Signature on next page]

Respectfully Submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on May 19, 2025; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron L. Gary