

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

In the Matter of:

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

**SIERRA CLUB’S POST HEARING REQUESTS FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES
COMPANY**

Sierra Club hereby submits this Post Hearing Request for Information to Louisville Gas and Electric Company and Kentucky Utilities Company (collectively referred to as “LG&E/KU” or the “Companies”). Please provide responses to these data requests below to the undersigned counsel.

GENERAL INSTRUCTIONS

- 1) **Definitions:** For the purposes of these data requests, the following definitions shall apply:
 - a) The term “LG&E/KU” means and includes Louisville Gas and Electric Company and Kentucky Utilities Company and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
 - b) The term “Companies” means and includes Louisville Gas and Electric Company and Kentucky Utilities Company and any and all affiliates and/or subsidiaries, successors, predecessors, agents, consultants, and witnesses in this proceeding, and any and all of their affiliates, subsidiaries, or predecessors.
 - c) “Document” means all written, recorded or graphic matters, however produced or reproduced, pertaining in any manner to the subject of this proceeding, whether or

not now in existence, without limiting the generality of the foregoing, all originals, copies and drafts of all writings, correspondence, telegrams, notes or sound recordings of any type of personal or telephone communication, or of meetings or conferences, minutes of directors or committee meetings, memoranda, inter-office communications, studies, analyses, reports, results of investigations, reviews, contracts, agreements, working papers, statistical records, ledgers, books of account, vouchers, bank checks, x-ray prints, photographs, films, videotapes, invoices, receipts, computer printouts or other products of computers, computer files, stenographer's notebooks, desk calendars, appointment books, diaries, or other papers or objects similar to any of the foregoing, however denominated. If a document has been prepared in several copies, or additional copies have been made, and the copies are not identical (or which, by reasons of subsequent modification of a copy by the addition of notations, or other modifications, are no longer identical) each non-identical copy is a separate "document."

- d) "And" or "or" shall be construed conjunctively or disjunctively as necessary to make the requests inclusive rather than exclusive.
- e) The terms "you" and "your" refer to "LG&E/KU."
- f) The term "person" means any natural person, corporation, corporate division, partnership, limited liability company, other unincorporated association, trust, government agency, or entity.
- g) The term "regarding" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.
- h) The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.
- i) "Identify" or "identifying" or "identification" when used in reference to a person that is a natural person means to state: the full name of the person and any names under which he conducts business; the current employer of the person, the person's job title and classification, the present or last known work address of the person; and, the present or last known telephone number of the person.
- j) "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.
- k) "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is

sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- (a) the type of document (e.g., letter, memorandum, etc.);
 - (b) the date of the document;
 - (c) the title or label of the document;
 - (d) the Bates stamp number or other identifier used to number the document for use in litigation;
 - (e) the identity of the originator;
 - (f) the identity of each person to whom it was sent;
 - (g) the identity of each person to whom a copy or copies were sent;
 - (h) a summary of the contents of the document;
 - (i) the name and last known address of each person who presently has possession, custody or control of the document; and,
 - (j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.
- l) “Identify” or “identifying” or “identification” when used in reference to communications means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, identify the document(s) containing or referring to the communication.
 - m) “Current” when used in reference to time means in the present time of this data request.
 - n) “Customer” means a person or company (residential, commercial, or industrial) who buys retail electricity on a regular and ongoing basis from LG&E/KU.
 - o) “Workpapers” are defined as original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas in-tact.

OTHER INSTRUCTIONS

- a) Responses are to be provided in electronic format (e.g., text documents should be in the original word processor file format or PDF, data files should be in Excel).

- b) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
- (a) the privilege asserted and its basis;
 - (b) the nature of the information withheld; and,
 - (c) the subject matter of the document, except to the extent that you claim it is privileged.
- c) For any document or set of documents LG&E/KU objects to providing to Sierra Club on the grounds it is burdensome or voluminous, please identify the specific document (see instruction (k) above).
- d) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
- e) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
- f) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
- g) For each response, identify all persons (see instruction (j)) that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.
- h) Identify which witness(es) at the hearing is competent to adopt and/or discuss the response.
- i) Please produce the requested documents in electronic format to the following individuals:

Kristin Henry
kristin.henry@sierraclub.org

Nathaniel Shoaff
nathaniel.shoaff@sierraclub.org

- j) Wherever the response to an interrogatory or request consists of a statement that the requested information is already available to the Sierra Club, 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).
- k) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.
- l) Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

POST HEARING DATA REQUESTS

- 3-1. Please explain whether the potential data centers' electricity load will fluctuate, and to what extent. Please specify both in terms of speed of fluctuations and the amount of electricity used. If the answer depends on the type of business the data center serves (e.g., artificial intelligence, crypto currency, other, etc.) please provide the answer for each type of data center that the Companies expect may locate in its service territory during the IRP time period.
- 3-2. Do the fluctuations identified in response to Question 3-1, above, pose a risk to the grid? If so, please explain the nature of the risk and the Companies' assessment of the likelihood of such a risk occurring.
- 3-3. How do the ramp rates for data centers compare to the ramp rates for the Companies' existing customers?
- 3-4. Are the Companies aware of whether any fossil fueled resource can match anticipated ramp rates for data centers?
- 3-5. Will the Companies impose any limit on the ramp rate for data centers that operate in its Kentucky service territories?
- 3-6. The Companies believe that if Ghent 2 were converted to a gas plant that it could not achieve an emission rate of 0.04 lb/MMBtu based on an analysis/study that was completed. Please produce that analysis/study.

Dated: May 19, 2025

Respectfully submitted,

/s/ Joe F. Childers

Joe F. Childers

Childers & Baxter, PLLC

The Lexington Building

201 West Short Street, Suite 300

Lexington, KY 40507

(859) 253-9824

joe@jchilderslaw.com

Of counsel

(not licensed in Kentucky)

Kristin A. Henry

Sierra Club

2101 Webster Street, Suite 1300

Oakland, CA 94612

kristin.henry@sierraclub.org

Nathaniel T. Shoaff

Sierra Club

2101 Webster Street, Suite 1300

Oakland, CA 94612

nathaniel.shoaff@sierraclub.org

CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of Sierra Club's Post Hearing Requests for Information to Louisville Gas and Electric Company and Kentucky Utilities Company in this action is being electronically transmitted to the Commission on May 19, 2025, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Joe F. Childers
JOE F. CHILDERS