

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**SOUTHERN RENEWABLE ENERGY ASSOCIATION'S SUPPLEMENTAL
REQUESTS FOR INFORMATION TO LOUISVILLE GAS
AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY**

Comes now the Southern Renewable Energy Association (also "SREA"), by and through counsel, and, in accordance with the Public Service Commission's Order dated October 30, 2024 propounds its Supplemental Requests for Information to Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU" and collectively "Companies").

- 1) In each case in which a request seeks information provided in response to a request of Commission Staff, reference to the Companies' response to the appropriate Staff request will be deemed a satisfactory response.
- 2) Please identify the Companies' witness who will be prepared to answer questions concerning the request during an evidentiary hearing.
- 3) These requests shall be deemed continuing and require further and supplemental responses if the Companies receive or generate additional information within the scope of these request between the time of the response and the time of any evidentiary hearing held by the Commission.

- 4) If any request appears confusing, please request clarification directly from Counsel for SREA as soon as reasonable.
- 5) To the extent that the specific document, workpaper, or information as requested does not exist, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.
- 6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person who is not familiar with the printout.
- 7) If the Companies have any objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify Counsel for SREA as soon as reasonable.
- 8) For any document withheld through an assertion of privilege, state the following: Date; author; addressee; indicated or blind copies; all person to whom distributed, shown, or explained; and the nature and legal basis for the privilege asserted.
- 9) In the event that any document called for has been destroyed or transferred beyond the control of the Companies, state: The identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the policy.
- 10)As the Companies discover errors in its filing and/or responses, please provide an update as soon as reasonable that identifies such errors and provide the document to support any changes.

WHEREFORE, SREA respectfully submits its Supplemental Requests for Information to the Companies.

Respectfully submitted,

/s/ David E. Spenard

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NOTICE AND CERTIFICATION FOR FILING

Undersigned counsel provides notices that the electronic version of the paper has been submitted to the Commission by uploading it using the Commission's E-Filing System on this 22nd day of January 2025. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), the paper, in paper medium, is not required to be filed.

/s/ David E. Spenard

NOTICE CONCERNING SERVICE

The Commission has not yet excused any party from electronic filing procedures for this case.

/s/ David E. Spenard

**SREA SUPPLEMENTAL REQUESTS FOR INFORMATION TO
LOUISVILLE GAS AND ELECTRIC COMPANY AND
KENTUCKY UTILITIES COMPANY
KY PSC CASE NO. 2024-00326**

1. Reference, Application, Volume III, Resource Assessment, Section 4.5 (“Stage Two: Recommended Resource Plan for IRP Reporting”) Table 29 [PDF 113 of 259]. Please identify and confirm which solar cost estimates were relied upon in developing the Recommended Resource Plan.
2. Reference, Application, Volume III, Resource Assessment, Section 4.4.1.3 (“Ozone NAAQS + ELG Environmental Scenarios”) [PDF 98 of 259]. Please provide any data or analysis the Companies have conducted (beyond their determination that costs will remain “uncertain”) that supports the basis for a 0.2% per year cost increase for solar technology between now and 2036.
3. Reference:
CONFIDENTIAL_20240901_ResourceScreeningModel_2024IRP_0328.xlsx,
[FixTime] tab, cells F12 and F13. On what date did the Companies finalize the cost estimates for “2030 Brown 12” and “2024 SCCT Cost”?
4. Reference: Response to KCA DR1, A-1-11. Do the Companies have an updated estimate for the Mercer County Solar costs based on the EPC bids due on December 20, 2024? If so, please provide the information.
5. Reference: Application, Volume III, Technology Update, Section 4 (“Converting NREL Costs from Real to Nominal Dollars”), Table 10 and the surrounding text, [PDF 33 of 259]. The Companies describe several adjustments to the NREL 2024 ATB cost assumptions:
 - a. What evidence do the Companies have to support that the Mercer County Solar project reflects the typical costs for a utility-scale solar project in the region?
 - b. Did the Companies make any attempts to identify additional sources to estimate the market cost of solar projects beyond only using the Mercer County Solar project estimate as representative of solar project costs? If so, what additional sources did the Companies identify?
 - c. Did the Companies make any attempts to identify any sources to estimate the market cost of wind projects? If so, what additional sources did the Companies identify?
6. Reference: Application, Volume III, Resource Adequacy Analysis, Section 5.4.1 (“Unit Availability Inputs”) [PDF 57 of 259]. In modeling the “uncertainty in timing and duration of forced outages,” did the Companies consider the coincident outages of thermal units during extreme weather events in the winter?

7. Reference: Response to JI DR1, A-1.1. Have the Companies made final decisions on the resources or projects included in the Certificate of Public Convenience and Necessity application that is planned to be filed in this first quarter of 2025? Is the CPCN application consistent with the resources in the Recommended Resource Plan?

8. The Kentucky Public Service Commission's November 6, 2023 Order in Case No. 2022-00402 (*Electronic Joint Application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates and Approval of a Demand Side Management Plan and Approval of Fossil Fuel-Fired Generation Unit Retirements*) states, (page 95) at pertinent part: The Commission expects our vertically integrated utilities, in furtherance of their service, and now reliability, obligations to replace generation capacity with "steel in the ground" or a Purchase Power Agreement.
 - a. In their planning for generation and capacity replacement, do the Companies recognize any ***difference(s)*** in risk (financial risk, implementation risk, compliance-related risk, rate risk, etc.) between "steel in the ground" projects and purchase power agreements? If yes, identify the ***difference(s)*** and explain how the Companies incorporate the quantitative and/or qualitative risk difference(s) into their planning? Please fully explain. If no, then why not?

 - b. In their planning for generation and capacity replacement, do the Companies recognize any ***difference(s)*** in risk (financial risk, implementation risk, compliance-related risk, rate risk, etc.) between self-build projects and non-self-build projects? If yes, identify the ***difference(s)*** and explain how the Companies incorporate the quantitative and/or qualitative risk difference(s) into their planning? Please fully explain. If no, then why not?