

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  
POST-HEARING 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 instructions concerning Post-Hearing Requests for Information, files its requests 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 any additional evidentiary hearing that might be ordered in the instant case.
- 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 date upon which the record is closed and matter is submitted to the Commission for a decision.

- 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 Post-Hearing 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 19<sup>th</sup> day of May 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 POST-HEARING REQUESTS FOR INFORMATION TO  
LOUISVILLE GAS AND ELECTRIC COMPANY AND  
KENTUCKY UTILITIES COMPANY  
KY PSC CASE NO. 2024-00326**

1. Reference; 807 KAR 5:058, Section 7(7)(c). Regarding the model design, model specification, and estimation of key model parameters concerning price elasticities of demand, please provide the following:
  - a. Identify the location in the record in the Integrated Resource Plan filing (and/or supporting material, including responses to the various data requests), at which assumptions concerning price elasticity (or price elasticities) for or concerning data centers in the base period and over the succeeding fifteen (15) years are quantified and/or discussed.
  - b. For data centers, do the Companies assume, for the base year and the succeeding fifteen (15) year term, that price elasticity among data centers will be homogeneous or, alternatively, that there will be a range or mixture of price elasticities with respect to data centers (over both the planning period and/or as between potential data centers)? If there is a range: (i) Identify the range, (ii) state the basis or foundation for the range endpoints and, if applicable, any variation during the planning period, and (iii) identify the anticipated or estimated distribution of potential data center load over the range of price elasticities identified (including providing a graph or table that demonstrates the distribution) over the planning period.